

# **BRIGHTON & HOVE CITY COUNCIL MEETING**

**4.30PM 31 JANUARY 2013**

**COUNCIL CHAMBER, HOVE TOWN HALL**

## **AGENDA**



**Brighton & Hove  
City Council**

# Council Meeting

Title:	<b>Council</b>
Date:	<b>31 January 2013</b>
Time:	<b>4.30pm</b>
Venue	<b>Council Chamber, Hove Town Hall</b>
Members:	<b>All Councillors</b> You are summoned to attend a meeting of the BRIGHTON & HOVE CITY COUNCIL to transact the under-mentioned business.
	Prayers will be conducted in the Council Chamber at 4.20pm by Father Jerry
Contact:	<b>Mark Wall</b> Head of Democratic Services 01273 291006 mark.wall@brighton-hove.gov.uk



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- Do not stop to collect personal belongings;
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- Do not re-enter the building until told that it is safe to do so.

## AGENDA

### 70. DECLARATIONS OF INTEREST

- (a) Disclosable of pecuniary interests not registered on the register of interests;
- (b) Any other interests required to be registered under the local code;
- (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

### 71. SIGNING OF THE ARMED FORCES COMMUNITY COVENANT

There will be a short signing ceremony led by the Mayor for the Armed Forces Community Covenant for Brighton and Hove.

*Ward Affected: All Wards*

### 72. MINUTES

**1 - 24**

To approve as a correct record the minutes of the last Council meeting held on the 13 December 2012 (copy attached).

*Contact Officer: Mark Wall*

*Tel: 29-1006*

*Ward Affected: All Wards*

### 73. MAYOR'S COMMUNICATIONS.

### 74. TO RECEIVE PETITIONS AND E-PETITIONS.

Petitions will be presented by Members and/or members of the public to the Mayor at the meeting.

The following e-petitions are due to be presented:

- (i) Pelham Street Crossing – Lead petitioner Rohan Lowe;
- (ii) Fix Penalty for Noise Pollution – Lead petitioner Shaun Robinson;
- (iii) Vote of No Confidence in the Green Administration – Lead petitioner Adam Campbell.

## **COUNCIL**

### **75. WRITTEN QUESTIONS FROM MEMBERS OF THE PUBLIC.**

A list of public questions received by the due date of 12noon on the 24<sup>th</sup> January 2013 will be circulated separately as part of an addendum at the meeting.

### **76. DEPUTATIONS FROM MEMBERS OF THE PUBLIC.**

A list of deputations received by the due date of 12noon on the 24<sup>th</sup> January 2013 will be circulated separately as part of an addendum at the meeting.

### **77. WRITTEN QUESTIONS FROM COUNCILLORS.**

**25 - 26**

A list of the written questions submitted by Members has been included in the agenda papers. This will be repeated along with the written answers received and will be taken as read as part of an addendum circulated separately at the meeting.

### **78. ORAL QUESTIONS FROM COUNCILLORS**

**27 - 28**

A list of Councillors who have indicated their desire to ask an oral question at the meeting along with the subject matters has been listed in the agenda papers.

### **79. REPORTS OF COMMITTEES.**

- (a) Call over (items 80 - 85) will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) To receive or approve the reports and agree with their recommendations, with the exception of those which have been reserved for discussion.
- (c) Oral questions from Councillors on the Cabinet, Cabinet Member and Committee reports, which have not been reserved for discussion.

### **6.30 - 7.00PM REFRESHMENT BREAK**

Note: A refreshment break of 45 minutes is scheduled for 6.30pm although this may alter slightly depending on how the meeting is proceeding and the view of the Mayor.

### **80. SUBMISSION CITY PLAN, PART 1**

**29 - 124**

Extract from the proceedings of the Policy & Resources Committee meeting held on the 24<sup>th</sup> January 2013 (to be circulated), together with a report of the Strategic Director; Place (copy attached).

*Contact Officer:* Helen Gregory  
*Ward Affected:* All Wards

*Tel:* 29-2293

**81. ADOPTION OF THE EAST SUSSEX, SOUTH DOWNS AND BRIGHTON & HOVE WASTE AND MINERALS PLAN 125 - 152**

Extract from the proceedings of the Policy & Resources Committee meeting held on the 24<sup>th</sup> January 2013 (to be circulated), together with a report of the Strategic Director; Place (copy attached).

*Contact Officer: Mike Holford Tel: 29-2501*  
*Ward Affected: All Wards*

**82. COMMUNITY SAFETY, CRIME REDUCTION AND DRUGS STRATEGY 2011-2014 153 - 300**

Extract from the proceedings of the Policy & Resources Committee meeting held on the 24<sup>th</sup> January 2013 (to be circulated), together with a report of the Director of Public Health (copy attached).

*Contact Officer: Linda Beanlands Tel: 29-1115*  
*Ward Affected: All Wards*

**83. REVIEW OF SECONDARY SCHOOL CATCHMENT AREAS 2013 301 - 310**

Extract from the proceedings of the Children & Young People Committee meeting held on the 14<sup>th</sup> January 2013, together with a report of the Interim Director; Children's Services (copy attached).

*Contact Officer: Gil Sweetenham Tel: 29-3474*  
*Ward Affected: All Wards*

**84. OPTIONS FOR PROVIDING ADDITIONAL SCHOOL PLACES IN 2013 AND 2014**

Extract from the proceedings of the Children & Young People Committee meeting held on the 14<sup>th</sup> January 2013, together with a report of the Interim Director; Children's Services (copies attached).

Note: This report has been withdrawn as the consultation process needs to be completed prior to a report being brought to the Council in March.

*Contact Officer: Gillian Churchill Tel: 29-3515*  
*Ward Affected: All Wards*

**85. HEALTH AND SAFETY ANNUAL SERVICE PLAN 2013/14 311 - 330**

Extract from the proceedings of the Policy & Resources Committee meeting held on the 24<sup>th</sup> January 2013 (to be circulated), together with a report of the Strategic Director; Place (copy attached).

*Contact Officer: Roy Pickard Tel: 29-2145*  
*Ward Affected: All Wards*

**86. NOTICES OF MOTION.**

**331 - 334**

The following Notices of Motion have been submitted by Members for consideration (copies attached):

- (a) **Council Structure & Service Delivery.** Proposed by Councillor Janio.
- (b) **Reject the Benefit Cap.** Proposed by Councillor J. Kitcat.
- (c) **Fair Deal for Brighton and Hove.** Proposed by Councillor Deane.  
- Withdrawn

**87. CLOSE OF MEETING**

The Mayor will move a closure motion under Procedure Rule 17 to terminate the meeting 4 hours after the beginning of the meeting (excluding any breaks/adjournments).

*Note:*

1. *The Mayor will put the motion to the vote and if it is carried will then:-*

- (a) *Call on the Member who had moved the item under discussion to give their right of reply, before then putting the matter to the vote, taking into account the need to put any amendments that have been moved to the vote first;*
- (b) *Each remaining item on the agenda that has not been dealt with will then be taken in the order they appear on the agenda and put to the vote without debate.*

*The Member responsible for moving each item will be given the opportunity by the Mayor to withdraw the item or to have it voted on. If there are any amendments that have been submitted, these will be taken and voted on first in the order that they were received.*

- (c) *Following completion of the outstanding items, the Mayor will then close the meeting.*

2. *If the motion moved by the Mayor is **not carried** the meeting will continue in the normal way, with each item being moved and debated and voted on.*

3. *Any Member will still have the opportunity to move a closure motion should they so wish. If such a motion is moved and seconded, then the same procedure as outlined above will be followed.*

*Once all the remaining items have been dealt with the Mayor will close the meeting.*

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fifth working day before the meeting.

Agendas and minutes are published on the council's website [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk). Agendas are available to view five working days prior to the meeting date.

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

### WEBCASTING NOTICE

This meeting may be filmed for live or subsequent broadcast via the Council's website. At the start of the meeting the Mayor will confirm if all or part of the meeting is being filmed.

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Therefore by entering the meeting room and using the seats around the meeting tables you are deemed to be consenting to being filmed and to the possible use of those images and sound recordings for the purpose of web casting and/or Member training. If members of the public do not wish to have their image captured they should sit in the public gallery area.

If you have any queries regarding this, please contact the Head of Democratic Services or the designated Democratic Services Officer listed on the agenda.

For further details and general enquiries about this meeting contact Mark Wall, (01273 291006, email [mark.wall@brighton-hove.gov.uk](mailto:mark.wall@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk).

### ACCESS NOTICE

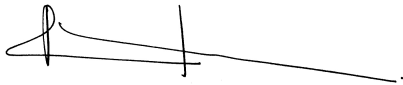
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Please inform staff on Reception if this affects you so that you can be directed to the rear of the Council Chamber or an alternative room where video conferencing facilities will be available for you to use should you wish to watch the meeting or need to take part in the proceedings e.g. because you have submitted a public question.

**We apologise for any inconvenience caused.**

Date of Publication - Wednesday, 23 January 2013

## COUNCIL

A handwritten signature in black ink, appearing to read 'Penelope Thompson', with a long horizontal stroke extending to the right.

Penelope Thompson  
Chief Executive

King's House  
Grand Avenue  
Hove  
BN3 2LS



<b>Council</b>	<b>Agenda Item 72</b>
31 <sup>st</sup> January 2013	Brighton & Hove City Council

## **BRIGHTON & HOVE CITY COUNCIL**

### **COUNCIL**

**4.30pm 13 DECEMBER 2012**

### **COUNCIL CHAMBER, BRIGHTON TOWN HALL**

### **MINUTES**

**Present:** Councillors Randall (Chair), Meadows (Deputy Chair), Barnett, Bennett, Bowden, Brown, Buckley, Hawtree, Carden, Cobb, Cox, Davey, Deane, Duncan, Farrow, Fitch, Gilbey, Hamilton, Hyde, Janio, Jarrett, Jones, A Kitcat, J Kitcat, Lepper, Littman, Mac Cafferty, Marsh, Mears, Mitchell, Morgan, A Norman, K Norman, Peltzer Dunn, Phillips, Pidgeon, Powell, Robins, Rufus, Shanks, Simson, Smith, Summers, Sykes, C Theobald, G Theobald, Wakefield, Wealls, Wells, West and Wilson.

### **PART ONE**

#### **51. DECLARATIONS OF INTEREST**

- 51.1 Councillor Simson declared a personal but non pecuniary interest in Item 56(a) a public question concerning the Dene's Youth Project as she was a trustee.
- 51.2 No other declarations of interests in matters appearing on the agenda were made.

#### **52. MINUTES**

- 52.1 The minutes of the last ordinary meeting held on the 25<sup>th</sup> October 2012 were approved and signed by the Mayor as a correct record of the proceedings.

#### **53. MAYOR'S COMMUNICATIONS.**

- 53.1 The Mayor stated that he was pleased to announce that Robert Robertson, the Mayoral Chauffeur won an award for completing the RAC Future Car Challenge on Saturday 3<sup>rd</sup> November, managing to get the mayoral car from Brighton to London with just over 30miles of charge left in the battery. He invited Robert to come forward to collect the award.
- 53.2 The Mayor stated that he was pleased to announce Brighton & Hove City Council's Soundscape project had received national recognition at the Noise Abatement Society's annual John Connell Awards. The council had been highlighted for its pioneering approach to considering noise in city planning projects, using sound to tackle antisocial

behaviour, and excellent multi-agency working. He then invited Gloria Elliot and Lisa Lavia from the Noise Abatement Society, and Matthew Eastell, from the Sustainable Communities Team to come forward to collect the award.

- 53.3 The Mayor noted that the Revenues & Benefits team had recently had a review which assessed their commitment to Customer Service and had passed. He then invited Councillor Littman and John Francis to come forward to receive the certificate on behalf of the team.

**54. TO CONSIDER NOMINATIONS FOR (A) THE MAYOR-ELECT AND (B) THE DEPUTY MAYOR-ELECT**

- 54.1 The Mayor noted that the next item dealt with the nominations for the Mayor and Deputy Mayor-Elect and called on the Monitoring Officer to outline the process and to seek nominations.
- 54.2 The Monitoring Officer thanked the Mayor and explained the process for the appointment of the Mayor-Elect and then sought nominations to the position.
- 54.3 Councillor G. Theobald nominated Councillor Cobb, and Councillor Peltzer Dunn formally seconded the nomination.
- 54.4 The Monitoring Officer noted that there were no other nominations and therefore Councillor Cobb was the only prospective nominee.
- 54.5 The Mayor declared that Councillor Cobb was duly appointed as Mayor-elect for the City of Brighton & Hove for the municipal year 2013-14.
- 54.6 The Monitoring Officer then noted that nominations were required for the position of Deputy Mayor-Elect and that it was usual practice for the outgoing Mayor to be duly nominated.
- 54.7 Councillor J. Kitcat nominated Councillor Randall and Councillor G. Theobald formally seconded the nomination.
- 54.8 The Monitoring Officer declared that Councillor Randall had been duly appointed as the Deputy Mayor-Elect for the municipal year 2013-14.

**55. TO RECEIVE PETITIONS AND E-PETITIONS.**

- 55.1 The Mayor invited the submission of petitions from councillors and members of the public. He reminded the Council that petitions would be referred to the appropriate decision-making body without debate and the person presenting the petition would be invited to attend the meeting to which the petition was referred.
- 55.2 Mr. Moorhouse presented a petition signed by 661 residents calling on the council to reject the Government's cuts to council tax benefit.

- 55.3 Ms. Clark presented a petition signed by 33 residents, requesting that the parking restrictions in Cromwell Road, Hove be amended and a zebra crossing installed to improve road safety.
- 55.4 Ms. Paynter presented a petition signed by 83 residents concerning the roll-out of side view only pedestrian crossing lights and asking that this be reviewed.
- 55.5 Ms. Lyon presented a petition signed by 694 residents concerning the cessation of pop concerts in Stanmer Park.
- 55.6 Councillor Mears presented a petition signed by 119 residents concerning the provision and accessibility of childcare facilities in Saltdean.

**56. WRITTEN QUESTIONS FROM MEMBERS OF THE PUBLIC.**

- 56.1 The Mayor reported that 4 written questions had been received from members of the public and invited Mr. Greenstein to come forward and address the council.
- 56.2 Mr. Greenstein noted that his question had been circulated and asked the following supplementary question; "On 25<sup>th</sup> October an employment tribunal found that the Office & Finance Manager of Deans Youth Project had been automatically unfairly dismissed for making a protected disclosure by revealing to the Chair of Trustees that another employee had been falsifying invoices.

Instead the claimant was herself dismissed on the grounds of theft and dishonesty. This was reported to the Police who found there was no substance in the allegations.

What steps have been taken by the Council, as a major funder, to ensure that a new management is put in place and that the claimant is reinstated in her post?"

- 56.3 Councillor Shanks replied;
- 56.4 The Mayor thanked Mr. Greenstein for his questions and invited Ms. Paynter to come forward and address the council.
- 56.5 Ms. Paynter thanked the Mayor and asked the following question, "Important decisions are taken by officers under delegated powers which serving Administrations must carry the can for and I am not aware of the current Administration having any wish to take back responsibility for any of them. Indeed I wonder if councillors are sometimes taken unawares when one is implemented that they had no say in.

How many delegated decisions are first notified to or discussed with Councillors?"

- 56.6 Councillor J. Kitcat replied, "I'll provide you a very full response in writing but to cover the overall theme, the way that this Council, as every other Council in England operates, is a division of labour between Members who set the policy and the officer who do the day to day operational running and delivery of the services. The delegated powers and the schedule of delegations we have has actually been relatively the same for quite some time and it's based on a model created by INLOGOV which is an expert body at the University of Birmingham in these matters.

There have been some tweaks but merely to adjust to our changes to the cabinet system and then from the cabinet system but the distribution of powers is unchanged, between officers and Members and the situation is, as you know because you attend our committees, make the Policy decisions and they are enacted under powers by officers. But many times those decisions made at delegated level by officers are done in consultation with members (in audible) and I think it works well."

56.7 Ms. Paynter asked the following supplementary question "Is it not true that certain decisions like hard copy planning material should be policy and not officer delegation decision?"

56.8 Councillor J. Kitcat replied, "Local Government has to operate on a balance of trust and understanding between Members, officers and the public and the delegations are the legal basis for how that division of labour happens. Now we can have a discussion about whether the policy of paper or digital; at what point that should be a decision by whom and that would be a fair discussion but ultimately it would not be reasonable to expect Councillors to be overseeing and managing every decision that the Council makes.

Councillors are not managers, councillors are there to set the policy of this Council by democratic process and the officers enact that. That's the basis at which Local and National Government works across much of the world and while there are sometimes imperfections in the balance of those I think overall the system has put us in good stead."

56.9 The Mayor thanked Ms. Paynter for her questions and invited Mr. Evans to come forward and address the council.

56.10 Mr. Evans thanked the Mayor and asked the following question, "Why are the pelican crossings being downgraded without any specific reference to them on the questionnaire when we have many disabled and vulnerable people that use Seven Dials for their local shops, post office and chemist?"

This question comes from the parents of a wheelchair user who know they are more secure with phased traffic lights on the existing crossing."

56.11 Councillor Davey replied, "Rather than crossings being downgraded, the whole area is being upgraded for pedestrians. The main reasons for replacing the pelican crossings with zebras is that zebra crossings provide an improvement to the pedestrian experience as the wait time is vastly reduced compared to traffic lights which have a pre-programmed timer installed and generally prioritise vehicle and traffic over pedestrians.

Effectively zebra crossings give priority to pedestrians. There is no evidence to suggest that zebra crossings are more dangerous than pelican crossings. It is considered by officers that the new crossings will provide a more convenient crossing facility for disabled and vulnerable people who will further benefit from the introduction of a raised table around the crossings. The combination of the raised table crossing together with the physical changes to the approaches to the roundabout as well as the roundabout

itself combined with the reduction in speed limits in the area to 20 miles per hour, which the administration is proposing, will combine to make the area safer for everybody however they are travelling.

Crossing surveys at Seven Dials show that many people currently cross on the red man instead of waiting for the green man to appear. This can be dangerous as drivers will not be expecting a pedestrian to cross during the red man phase. Observations also show that the traffic light crossings result in a great deal of additional waiting time for vehicles, creating unnecessary delay and frustration. This occurs because the traffic lights will still change to red even though the pedestrian has already cross the road.

The proposals have been discussed with the representatives from the Federation of Independent Living on two occasions, firstly by myself and then by officers. The Federation agreed on balance they would benefit the mobility impaired. The questionnaire is intended to indicate a broad level of support or opposition to the proposals which were clearly identified in the consultation plans including the zebra crossings. It is not practical to seek to ask questions about each element of a scheme as the questionnaire would become overly lengthy and complicated.

Space is provided for additional comments and all comments made in this way are analysed to identify any particular trends or patterns and will be reported as part of the consultation report. It is worth noting that 49 of those who responded to the consultation indicated that they had a disability and that 59% of those indicated that they are in favour of the proposals.”

56.12 Mr. Evans stated that he did not have a supplementary question.

56.13 The Mayor thanked Mr. Evans for his question and invited Mr. Jenner to come forward and address the council.

56.14 Mr. Jenner asked the following question, “In light of the plethora of consultations being undertaken by the Green Administration, especially in relation to traffic proposals are Transport Consultations carried out in isolation of each individual case?”

56.15 Councillor Davey replied, “Engaging with the city is a priority for the Green administration and for the Council in general. Both transport work and the associated consultations are not carried out in isolation of each other, they form part of the forward plan which is outlined as a program of work on a yearly basis in the Annual Local Transport Plan Capital Spend which is agreed following finalisation of the allocation at Budget Council.

Transport project teams work closely together to ensure that all projects and the desired outcomes are co-ordinated and fit in with the aims of the Local Transport Plan that was agreed by all parties at Full Council in May 2011. The current year’s program was agreed in March this year by Cabinet and next years will go before the Policy and Resources Committee after Budget Council.

Consultations on major works are all timetabled in the Engagement Calendar which is overseen by the Community Engagement Partnership which has membership from all three parties.”

- 56.16 Mr. Jenner asked the following supplementary question, “Do you believe that the knock on effect of all the changes can be seen? For instance, with the closure of the Old Shoreham Road whilst the cycle lane was created, Wilbury Avenue and Wilbury Road became a cut through with now potentially an 18 month road closure due to the bridge being damaged caused by heavy traffic and much heavier usage. The lights on The Drive and Cromwell Road has increased the traffic on Fonthill Road, Montefiore Road, Lyndhurst Road and other roads off it. Therefore were these shown in any traffic analysis and have similar analyses been undertaken on a wider number of roads in relation to the Seven Dials proposals?”
- 56.17 Councillor Davey replied, “Yes I’m sure that’s the case, I’m not sure whether your referring to the time when the actual works take place or once the works are implemented but certainly with regards to whilst the works are taking place, a full plan will be developed by the officers responsible for the project and they will liaise with the highways management team to minimise disruption but it’s inevitable that where changes and improvements occur there will be some disruption and I’m sure that the many people who live around and use the new excellent crossing facilities which have been put on the Old Shoreham Road and will be at the junction of The Drive and Cromwell Road, will very much appreciate the new facilities once they are in place.”
- 56.18 The Mayor thanked Mr. Jenner for his questions and noted that this concluded the item.

## **57. DEPUTATIONS FROM MEMBERS OF THE PUBLIC.**

- 57.1 The Mayor reported that no deputations had been received from members of the public for the meeting.

## **58. PETITIONS FOR COUNCIL DEBATE**

- 58.1 The Mayor stated that the council’s petition scheme provided that where a petition secured 1,250 or more signatures it could be debated at a Council meeting. He had been notified of one such petition which had sufficient signatures to warrant a debate and therefore would call the lead petitioner to present their petition before opening the matter up for debate.

### **(a) Seven Dials Improvement Scheme**

- 58.2 The Mayor then called on Mr. Evans to present the petition concerning the Seven Dials Improvement Scheme.
- 58.3 Mr. Evans thanked the Mayor and stated that a total of 1,385 people had signed the paper petition which read as follows:

“We the undersigned petition the council to reject the proposals as they stand. We oppose any scheme at the Dials which may lead to traffic being diverted onto residential streets

We are in favour of changes to our local area which improves the environment for all users.”

- 58.4 Mr. Evans stated that local residents and traders were in favour of improvements to the Seven Dials area, but were concerned over the consultation process and the impact of parking in surrounding areas should the current proposals be approved at the Transport Committee in January. He stated that the consultation process needed to be extended and the proposals reviewed in light of the concerns that were being raised and asked that consideration be given to delaying the implementation of the scheme.
- 58.5 Councillor Davey thanked Mr. Evans for attending the meeting and stated that a lot of work had been undertaken, including traffic modelling and monitoring of surrounding streets and this would be repeated if necessary. He also noted that there was an amendment from the Labour & Co-operative Group and stated that he was happy to accept it.
- 58.6 Councillor Robins thanked Councillor Davey for accepting the amendment and formally moved it on behalf of the Labour & Co-operative Group.
- 58.7 Councillor Mitchell formally seconded the amendment.
- 58.8 Councillor Cox stated that he had been in discussions with various people and local traders during the last two weeks and all had acknowledged the need to improve the Seven Dials area. Over the years there had been a number of accidents and concern remained that a cyclist would be killed if the junction was not improved. He queried whether the meeting that was now scheduled for next Monday would be considered as further consultation, bearing in mind that it was intended to receive a report to the January Committee meeting.
- 58.9 Councillor G. Theobald welcomed the petition and the amendment and stated that it was the third most dangerous junction in the city and something needed to be done to address this.
- 58.10 Councillor Buckley stated that she supported the proposals for improvement but felt that further consultation was required and that it needed to include interest groups such as the visually impaired and disability groups, so that their views could be taken into account.
- 58.11 Councillor Mitchell welcomed Councillor Davey's comments but expressed concern over the fact that the decision to take the improvement programme forward and undertake a consultation process had not been reported to the Transport Committee in the first instance. She hoped that the concerns raised by the petition and local residents would be taken into account in the report to the committee in January.
- 58.12 Councillor Davey noted the comments and stated that everyone agreed there was a need to take action and improve the Seven Dials area. The difficulty was in finding a solution that could meet the majority of aspirations. He also acknowledged that briefings should have been offered to councillors in regard to the scheme being taken forward and noted that these had now taken place and that further briefings would be made available on request. He was also willing to meet with residents and discuss matters so that concerns could be taken into account and hopefully a solution found to improve the vitality of the area.

58.13 The Mayor noted the comments and thanked Mr. Evans for attending the meeting and presenting the petition. He then put the recommendations to refer the petition to the Transport Committee as amended for consideration to the vote which was carried.

58.14 **RESOLVED:** That the petition be referred to the Transport Committee for consideration and the committee be requested to ensure that the following measures have taken place:

- (i) That in view of the large amount of concern expressed by residents living in the 7 Dials area as evidenced by this petition, the current proposals for the traffic and highway changes in their current form are reviewed;
- (ii) That adequate traffic modelling is undertaken before any further proposals are brought forward in order to fully understand the potential for any increase in 'rat-running' traffic through side roads; and
- (iii) That this work is followed by further public consultation on the detail of the scheme as it is proposed to affect pedestrians and any other changes in the plans to hopefully ensure good traffic flow.

## **59. WRITTEN QUESTIONS FROM COUNCILLORS.**

59.1 The Mayor reminded the Council that written questions from Members and the replies from the appropriate councillor were now taken as read by reference to the list included in the addendum, which had been circulated as detailed below:

### **(a) Councillor G. Theobald**

59.2 "In view of the welcome changes to local government finance which mean that councils such as Brighton & Hove will retain half of any increase in business rate income from 1<sup>st</sup> April 2013, does the Leader of the Council agree with me that it is vitally important for council tax payers that the Council does all it can to ensure that all businesses in the city are paying their full business rates as assessed by the Valuation Office?

Would the Leader of the Council also please advise me what was the rateable value, and consequently business rate paid by the Co-op on their London Road store (a) for the last full financial year of operation prior to closure in 2007; and (b) during each of the financial years since 2007 that the property has been left vacant."

### **Reply from Councillor J. Kitcat, Leader of the Council.**

59.3 "We have an excellent foundation for Business Rates collection. Last year the collection rate was 98.56% and we are on target to increase collection further this year. Also, the Business Rates team is conducting a full review of processes, which will bring improvements both in customer service and collection.

Profiling the Business Rates taxbase itself is a core piece of work and is proving to be very complex. We do have concerns about the impact of ongoing appeals against Rateable Values. The government's Valuation Office Agency deals with these directly,



but they do not provide us with full information. We therefore have limited knowledge of the quantity and identity of appellants, when they will be answered, or whether individual cases are likely to go up or down. I hope Cllr Theobald will join me in lobbying government to demand improvements in the performance and openness of the Valuation Office Agency in these regards.

Meanwhile, we have engaged the consultants Wilks Head and Eve to help us with our profiling in this area. They will also be advising us more generally about accurately maximising the properties that are listed for Business Rates.

Regarding the Co-Op, payment was made in full while the property was occupied. The Rateable Value was £220,000, translating to a £100,398.76 charge in 2005/6 and £85,081.53 for a partial 2006/7 year. After that, changes were made to the Rateable Value due to splitting of the property, and there is currently a legally prescribed exemption in place due to Health and Safety issues. Our Revenues team continues to monitor the situation. More generally, we are looking at ways of encouraging empty properties back into use and have provisionally set funding aside in the budget for Business Rate incentives in this area."

#### **60. ORAL QUESTIONS FROM COUNCILLORS**

- 60.1 The Mayor noted that notification of 7 oral questions had been received and invited Councillor Geoffrey Theobald to put his question to Councillor J. Kitcat.

##### **King Alfred**

- 60.2 Councillor G. Theobald asked, "I think we can all agree that something needs to be done with the King Alfred. As I'm sure Councillor Bowden is aware, there are now at least 5 developers in the City and beyond who have expressed an interest in providing new sporting and other leisure facilities on the King Alfred site. I've now met most of these people as I'm sure that you have too, Councillor Bowden and the on thing that they have all said to me is that they would like the Council to set out a timetable as soon as possible for when a preferred business plan will be chosen in order to give them the level of service they require to plan properly for their bid.

Indeed they have gone further and said that if the Council doesn't give them that timetable then they may well walk away. Given at long last the cross party working group, on the King Alfred, has already had it's first meeting without a timetable being set, will Councillor please give me, and more importantly those developers, a pledge to set that timetable at the next meeting of the Working Group in January?"

- 60.3 Councillor Bowden replied, "As you rightly said the cross party working group met on the 27<sup>th</sup> November for the first time, it's not any cross party, we also have an external person in the guise of Tony Mernagh so we'll have some very commercial sense brought to bear on our deliberations. The first meeting was to set up parameters, I'm very pleased that Councillor Wealls was part of that deliberation and we're looking at a very long list of ideas that we would like to see come to the next committee where I do hope, indeed, that we will start setting out a timetable for our deliberations to be concluded and to go out to the market to tell them what we are hoping to see in this site which has to comply and conform with what we are hoping will be accepted within the City Plan.

There is a long wish list; what we can actually deliver, as you say there are a lot of people lining up some more interesting than others, I'm not going to see all those people yet because I don't want to start entering detailed conversations although I know that officers are having some of those conversations and they are shaping some of the thinking so the next meeting that we have, I think, I look to Councillor Wealls as I think it's in January, we will have a progress report, no one will be kept waiting around. We will not have a repeat of the Black Rock debacle where we had ten disappointing wasted years so we will move as quickly as possible to a situation where we hope we will have a preferred partner to work with."

60.4 Councillor G. Theobald asked the following supplementary question, "I do appreciate a response where the Chair refers to lots of ideas and wish lists and such like but what I'm really after is a timetable because these developers and others are going to get fed up and going to go away and the local MP, Mike Weatherly, has been making exactly the same point. I really think, for instance, September/October 2013 ought to be the Policy and Resources Committee that we aim at where we actually select the final bidder. That's my challenge to you and your administration. September or October 2013 Policy and Resources Committee; actually seeing the schemes and approving one of the developers so that we can then move on."

60.5 Councillor Bowden replied, "Well we all remember what happened with Black Rock before and we're not going to have the same issue happening in King Alfred this time. If we can move faster than September I guarantee we will, so we're not going to muck about, we all want to see cranes going up and action because we cannot put it off any longer. We are going to have discussions with Sport England and there may be more money from their Iconic Fund and I've got a scheduled meeting with them coming up possibly before Christmas.

At the first meeting of the working group; the members present, all expressed views of what they would like to see in the new site. Officers are going away to see how feasible some of those are, we'll come back, assess that and from the next meeting I hope we will be much clearer on the parameters of what we will be asking of developers. All the other schemes that have come forward at the moment are promising all sorts of ideas; multiplex cinemas, art centres and more. Once we have in our minds exactly what we want on a cross-party basis then we will invite serious discussions but if we can move faster then we certainly will."

#### **Funding for Policing and Community Safety**

60.6 Councillor Mitchell asked, "The newly elected Police and Crime Commissioner for Sussex has recently announced that the overall policing budget for the county will stay the same for the forthcoming year but cuts to this budget are expected the year after. Could Councillor Kitcat please outline what discussions he has had with the Commissioner in relation to the future funding of the policing and community safety needs of the city and how he will ensure that the Commissioner particularly gains an appreciation of the preventative and support work currently being undertaken here and the importance of that work being continued in the face of further cut backs?"

60.7 Councillor J. Kitcat replied, "I have had a number of informal conversations with the Police Commissioner already since her election and I have a more formal meeting with

her on Tuesday but before the election itself even took place I worked with officers and colleagues to prepare a very extensive briefing pack for the candidates and whoever the successful candidate would be to make them as aware as possible to the unique and important work that our partnership on community safety, drugs prevention and so on, does in this city and the importance of protecting that and the informal insurances we've had so far are that the budget from the PCC will be protected until the 2013/14 financial year and that carry-overs that we have negotiated will be protected as well. Obviously like Council space, there is a level of uncertainty about what their future budget positions are but I'm committed to fighting for this City and getting as much budget as possible to provide those essential services to our communities."

- 60.8 Councillor Mitchell noted the response and stated, "I'm sure our 2 members from this authority on the Police and Crime panel will do all they can to put forward and make the case for the policing and community needs of this city to be adequately funded. I would actually hope that there is a way that this Council can also place some part in holding Commissioner to account and therefore I look forward to seeing how this role will be developed and how the wishes of this Council can be adequately represented as part of that process."

#### **Coach Parking**

- 60.9 Councillor Cox asked, "What are the Administration's plans for improving coach parking in Brighton and Hove?"
- 60.10 Councillor Davey replied, "As I'm sure you're aware, this is not an easy problem to solve otherwise I'm sure it would have been solved by the previous Conservative Administration or by the Labour Administration that preceded it. The main problem is the lack of availability of a suitable location for a coach park here. Space in the City is of a premium. I suggested at the last Transport Committee Meeting that we identify funding for a proper study to be commissioned that will look at the current situation, seeing what can be learned from elsewhere and be tasked with identifying possible solutions. So if we get capital funding to be agreed at Full Council and the subsequent agreement by Policy & Resources, that study could start in the next financial year. I would propose that all parties will have input into the brief for that study and will be given the opportunity to input into it."
- 60.11 Councillor Cox asked the following supplementary question, "Could Councillor Davey clarify what's happened to the £100,000 that was set aside for a temporary coach park and whether a full equality impact assessment was done on the decision to not have a temporary coach park; the impact, in particular, on the disabled, the young and the elderly who are predominantly coach users?"
- 60.12 Councillor Davey replied, "There was no concrete decision, or certainly business case to build a coach park and as I know you're only to aware the £100,000 was used by your party to part fund the freeze in Council tax at Budget Council in February this year so basically the answer to the question of what happened to the £100,000 is that you spent it."

**Free Parking for the Christmas Period**

60.13 Councillor Robins asked, "Will Councillor Davey reconsider his opposition to allow free parking in Brighton and Hove in the run up to Christmas and give a boost to the local traders in the same way that other Sussex towns are doing?"

60.14 Councillor Davey replied, "Parking charges encourage a high turnover of vehicles in our car parks on street. This in turn reduces queues to enter our car parks and helps reduce congestion which is good for shops and good for business. At the same time the Council has invested £4m in our car parks dramatically improving the parking experience for the city's drivers. Far from supporting local traders, offering free parking would mean that less parking was available for those wishing to use local shops. As parking spaces would be taken up by long term parkers, the end result would be that there would be fewer spaces available for shoppers and more drivers trying to use them. In an excellent report which I could commend to Councillor Robins from the RAC it said that, "there is evidence that such free parking does not provide additional parking resources for shoppers." Should you wish to check it; out it is called 'Space and Perspectives on Parking Policy' and it came out in July this year.

Another recent report carried out for London boroughs in October this year concluded that there is no such thing as free parking. I quote, "all of the research reviewed including that sponsored by the Industry Association such as the British Parking Association highlights that somebody has to pay for development and maintenance for parking spaces as well as the management of any enforcement regime to ensure that efficient use, where parking is the responsibility of Local Authorities, it is the local tax payers who pick up the cost of provision if revenue is not sufficient to cover costs." If we were to offer free parking in the run up to Christmas that would cause a significant budget pressure and that would be in the region of £30-40,000 a day should you wish to extend that for a week, it would not be probably over £100,000 there and should you wish to extend that for a month you'd be looking at £500,000.

As most of the street parking is shared with residents it would make it much more difficult for residents for residents to find spaces near their homes particularly in the City Centre and it would of course also add to both congestion and air pollution. You must remember that money will have to be found from somewhere and particularly as the income is used to pay the loans, agreed by all parties in this chamber, to refurbish the Council Car Parks."

60.15 Councillor Robins noted the response and stated "I'll take that as a no then shall I?"

**Intelligent Commissioning**

60.16 Councillor Janio asked, "Would the Leader of the Council please confirm that with over 500 Council employees holding the title of Manager, that the new Chief Executive's terms of reference include reducing the management overheads that currently devour a disproportionate amount of the Council Budget and thus enable essential front line service, not just to be maintained, but in increased during the current budget discussions?"

60.17 Councillor J. Kitcat replied, "I always find it a bit difficult to take these kinds of questions from a Conservative Councillor when it's their Government imposing utterly

disproportionate cuts on the Council Budget. It's a bit rich Councillor Janio when Mr Pickles and his fellow Ministers match the level of cuts that they're imposing on Local Government, perhaps we can have another conversation, but when your own Conservative Chairman of the LGA points out that it's 28% reduction for Local Government that have been delivered so far and much more to come sadly and only 8% for Whitehall. There's a bit of a disconnect there and that's not right.

In terms of your question Councillor, what I'd say to you is first of all I reject this whole simplistic notion of front line versus back office. You can't have a front line without the back office; the two go together so let's have a sensible mature discussion about services. How they're funded and how they work because all levels of officers are key to delivering but of course we need to be efficient which is why since we took control of this Council we've delivered ever greater under spends earlier and the VFM has been exceeding targets so we have been finding savings, we have had to reduce the head count, unfortunately, but there have been no compulsory redundancies so I think, given the appalling circumstances of Government, we're doing incredibly well and I'm delighted that our new Chief Exec is on board and is going to take us further on that."

60.18 Councillor Janio asked the following supplementary question, "Would he like me to sit one afternoon with him and explain the bureaucracy of this Council?"

60.19 Councillor J. Kitcat replied, "I noted that Councillor Cox appreciated my answer earlier on about the division between Councillors and Officers and it's sad that Councillor Janio didn't quite get that which is the point that we set the goals and the Policies of this Council and we don't meddle in the management grades. That is an officer matter and I'm not going to discuss it further."

#### **Paring on Grass Verges and Pavements in North Portslade**

60.20 Councillor Gilbey asked the following question, "Since the construction of PACA's new Sixth Form Site began on Chalkey Road on the sports centre car park site, despite an alternative car park being made nearby on the PACA site, vehicles belonging to sports centre users are currently parking on the wide grass verges on Chalkey Road; not only damaging the verges but causing a danger to the pedestrians with vehicles skidding out of control. I am pleased that this area is to be looked at as a pilot but what interim measures are to be taken and when?"

60.21 Councillor Davey replied, "I'm pleased you and your Ward have agreed for this to be a pilot for the testing out of new powers to restrict parking on grass verges. I know that you've met with officers already and I think that enforcement action is taken by Council parking attendants where waiting restrictions apply and officers are investigating other options to protect the foot way such as improved signing, subject to identifying resources. So I think it's actually something that you've been involved in a lot more than I have and you've been meeting with officers about this. I think there's probably very little that can be done and it's probably going on for some time and these new powers can be agreed at Transport Committee in January and subject to that, we'll try to get those in as soon as possible."

60.22 Councillor Gilbey asked the following supplementary question, "I understand that if the pilot is approved the scheme wouldn't be implemented until next summer. The building is actually going on until September 2013 so would you consider taking funding for

these pilots from the well funded Local Transport Plan Budget so that they can be implemented more quickly?"

- 60.23 Councillor Davey replied, "We'll do everything possible, subject to the agreement at Transport Committee and hopefully maybe discuss it at Transport Committee to bring these through as quickly as possible."

#### **Allocation Policy for New Build**

- 60.24 Councillor Mears asked the following question, "Housing Committee has overall responsibility for the Council's housing functions which includes allocations to new build and refurbish properties. Following on from the Housing Committee Meeting where confirmation was given that the Council now has only one Housing Allocation Policy that started under our administration, can the Lead Member of Housing confirm when the review of the Allocation Policy will take place?"
- 60.25 Councillor Wakefield replied, "All Council Housing properties, whether new build or otherwise are allocated as Councillor Mears has said, per the Allocation Policy which, as Councillor Mears has said, is the same Allocation Policy at present that the Conservative Administration put into place. The Allocations Policy will be looked at, I don't have a firm date as to when at the moment."
- 60.26 Councillor Mears asked the following supplementary question, "As we've already received consultation papers from Central Government around the Allocation Policy, these papers came out in June, I think it's about time that we actually had a date set for Housing Committee to discuss this Allocation Policy, bearing in mind it is the Housing Committee that has the housing function under the Housing Act to ensure that all properties are appropriately allocated and to ensure that if they are disabled units; they are actually allocated to the required standards of the people that most need them. I would like reassurance from the Member of Housing that she will bring this paper to the Housing Committee with a firm date so the Housing Committee can actually discuss it in detail."
- 60.27 Councillor Wakefield replied, "Certainly it will come to Housing Committee that is the correct place for it to come. I don't have a date at the moment, I will re-iterate that, but it will be coming. Just to reassure everybody that units that are adapted for people with needs are given to people with needs and we will be continuing a fair and open Allocations Policy as per the one your Administration had put in place. There will be at some point, it isn't timetabled yet, a need to review the policy and obviously the right place for that to be discussed will be at Housing Committee."
- 60.28 The Mayor noted that this concluded the questions from Members.

### **61. REPORTS OF COMMITTEES.**

#### **(a) Callover**

- 61.1 The following items on the agenda were reserved for discussion:

- Item 62 - Council Tax Discounts and Exemptions Reform
- Item 63 - Council Tax Support System – Final Scheme

Item 66 - Two-Year-Old Free Early Learning Entitlement

**(b) Receipt and/or Approval of Reports**

61.2 The Head of Democratic Services confirmed that the following reports on the agenda with the recommendations therein had been approved and adopted:

Item 64 - Statement of Gambling Pursuant to the Gambling Act 2005

Item 67 - Part Two Minutes – Exempt Category 3

Item 68 - Part Two Proceedings

**(c) Oral Questions from Members**

61.3 The Mayor noted that there were no oral questions in relation to those items that had not been reserved for discussion.

**62. COUNCIL TAX DISCOUNTS AND EXEMPTIONS REFORM**

62.1 Councillor Littman introduced the report stated that he wished to place his thanks to the officers involved in producing the report on record. He believed that the proposals were excellent and that the changes would encourage a greater turnover of empty properties.

62.2 Councillor A. Norman welcomed the report and the flexibility that the proposed changes provided in terms of council tax and hoped that it would encourage the release of long-term empty properties. She also thanked the officers involved in producing the report and sought clarification in regard to paragraph 3.1.3 and the ability to extend the 6-month period in exceptional circumstances.

62.3 Councillor Hamilton welcomed the report and stated that he believed in provided the potential to raise extra income and hoped that the turnover of empty properties would be speeded up.

62.4 Councillor Peltzer Dunn stated that he supported the proposals and hoped that genuine home-owners who had to leave their property would not be penalised if they failed to sell their homes within the 6-month period. He noted that the Leader of the Council had stated that cases would be treated on their individual merits at the Policy & Resources Committee meeting.

62.5 Councillor J. Kitcat welcomed the support for the report and its proposals and noted that there were approximately 15,000 people on the housing waiting list. He hoped that the changes would encourage landlords to release properties and a behavioural change that would see long-term empty property numbers reducing. He also confirmed that the scheme's flexibility meant that cases could be treated on their merits and extensions granted in exceptional circumstances.

62.6 Councillor Wealls queried the value of the consultation process which had not been obligatory and had not resulted in any real benefit and therefore suggested that there was a need to give consideration to the cost of such consultation exercises in the current economic climate.

62.7 Councillor Littman noted the comments and thanked the cross-party scrutiny panel for their recommendations and stated that where appropriate exceptional cases would be treated on their merits. He believed the consultation process had been worthwhile and noted that it was expected that 70% of improvements would be undertaken within the 6-week period.

62.8 The Mayor noted that the recommendations had been moved and put them to the vote.

**62.9 RESOLVED:**

- (1) That the Council abolishes the 10% Second Home Discount, meaning that those liable for Second Homes will pay full Council Tax from 1 April 2013;
- (2) That the Council retains the current arrangement for empty dwellings undergoing repair or structural work, namely that liable parties will receive a 100% discount for up to 12 months, or for 6 months after work is complete, whichever is sooner. This provision is currently known as a "Class A Exemption";
- (3) That the Council introduces a period of up to six weeks 100% discount for dwellings that are empty and unfurnished, to replace the current six month exemption known as Class C;
- (4) That officers will have discretion, (a) to give an additional period of up to six weeks 100% discount after a change of liable party and (b) in exceptional circumstances, to extend the six week 100% discount to an absolute maximum of three months;
- (5) That the Council introduces an Empty Home Premium at the maximum 50%, meaning that those liable for empty dwellings will have to pay 150% Council Tax after two years of the dwelling remaining empty;
- (6) Accordingly that the Council makes the formal determinations and decisions for the financial year commencing on 1 April 2013 and subsequent financial years as set out in Appendix 4;
- (7) That the Director of Finance and other relevant officers identified in the Council's Scheme of Delegations to Officers as responsible for local taxation services and revenues and benefits, be authorised to take all appropriate steps to implement and administer the recommendations, including publishing in accordance with statutory requirements; and
- (8) That the Head of Law be authorised to amend the Council's constitution by the addition in Part 3.1 (Council Functions) of a new paragraph in section 3.01 after the paragraph relating to Policy and Budget: "Council Tax: Exercising any function which, under section 67 of the Local Government Finance Act 1992, may only be discharged by the authority.

**Note:**

62.10 The Mayor then adjourned the meeting for a refreshment break 6.15pm.



62.11 The Mayor reconvened the meeting at 7.00pm.

### **63. COUNCIL TAX SUPPORT SYSTEM - FINAL SCHEME**

- 63.1 Councillor Littman introduced the report and stated that having had to take on the responsibility for administering and producing a council tax support system he believed that officers had produced an exceptional scheme. He noted that the council would be putting in £1m towards the scheme, in order to ensure that the vast majority of people would pay less than £2 a week in council tax. He therefore recommended the scheme to the council.
- 63.2 Councillor A. Norman stated that it was an excellent report and wished to place on record her thanks to the officers concerned. She referred to paragraph 3.16 and stated that she hoped appropriate measures would be set in place to keep the potential for fraud to a minimum.
- 63.3 Councillor Hamilton noted that the Government's decision to give local authorities responsibility for their own council tax support scheme had come with a cut in level of funding available to support such a scheme. He was concerned that the changes would result in a reduction in the collection rate and add pressure for those agencies that offered support and advice for debt management.
- 63.4 Councillor G. Theobald stated that the Administration had the choice to fully fund the scheme and it was for the council to decide on how resources were distributed. He noted that the Government had sought to enable local authorities to have greater control over their own schemes as part of its management of deficit that had been inherited.
- 63.5 Councillor J. Kitcat stated that he believed the Government had not given the process sufficient consideration and had issued regulations at the last minute which had not helped in enabling officers to develop the scheme. He believed that the scheme before the council was likely to be one of the best in the country and noted that the council was further ahead than many other authorities because of the work undertaken by the officers.
- 63.6 Councillor Phillips stated that she had chaired the scrutiny review panel which had been established following the Leader's request for a review of the changes that were being recommended by the Government. She wished to thank her fellow panel members and the representative from the East Sussex Credit Union and noted that the majority of recommendations had been taken on board. However, she was concerned that for many households the additional council tax payment was going to prove to a real hardship.
- 63.7 Councillor Janio suggested that the heart of the problem was as a result of the previous Government's failure to control borrowing and it was now left to the current Government to tackle the issues. He suggested that the Administration should do the same and find the resources to fully fund the scheme should they wish to do so.
- 63.8 Councillor Jarrett stated that the Government had given the responsibility to local authorities but at the same time reduced the level of funding available. It was for each

local authority to determine how they managed the situation and he believed the officers had done a tremendous job in bringing forward a scheme that could be funded and that could support many of the households affected.

- 63.9 Councillor Powell stated that in her role as a career adviser she had seen more long-term unemployed people in the last 6 months than ever before and suggested that the changes were the start of an attack on the Welfare State. She believed officers had done an excellent job in developing a scheme for the city and suggested that the Government should look at ways of helping local authorities to administer their schemes.
- 63.10 Councillor Jones stated that whilst he believed it was the best scheme possible for the city, he remained unconvinced that it would protect the most vulnerable in the city. He was concerned that the council was being placed in such a position and unsure as to whether he could support the recommendations before the council meeting today.
- 63.11 Councillor Mears stated that she was disappointed by the various comments attributing the blame on the Government and pointed out that it was for the Administration to look after the interests of the residents of the city. As such, they could decide to identify the necessary funding for the scheme so that there was no impact of those in receipt of council tax benefit and to set a budget that was appropriate for all.
- 63.12 Councillor Littman noted the comments and stated that he believed it was a fair scheme for the city and that without it there was a likelihood of a more costly one being imposed. He therefore recommended that it be approved and noted that it would need to be reviewed, in order for a permanent scheme to be established for 2014.
- 63.13 The Mayor noted that the recommendations contained in the report had been moved and put them to the vote.
- 63.14 **RESOLVED:**
- (1) That the Overview and Scrutiny report at appendix 1, its recommendations and the Policy & Resources Committee's responses at appendix 2 to the report be noted;
  - (2) That the information about the Government's October announcement of transition grant at appendix 3; be noted;
  - (3) That the feedback from consultation and the responses at appendix 5 and section 4 of the report be noted;
  - (4) That the Equality Impact Assessment at appendix 6 to the report be noted;
  - (5) That it be agreed that the proposals in the draft scheme published in July be adopted with the amendments necessary to satisfy the criteria for transition grant set out in the October announcement;
  - (6) That the full text of the final scheme as detailed in appendix 4 and in the list of amendments as detailed in the addendum papers be agreed;

- (7) That accordingly to make the Council Tax Reduction Scheme (Pensioners) (Brighton & Hove City Council) 2013 and the Council Tax Reduction Scheme (Persons who are not Pensioners) (Brighton & Hove City Council) 2013 (which together make up the main scheme) as set out in Part 1 of appendix 4 and the Discretionary Council Tax Scheme (Brighton & Hove City (Council) 2013 (the discretionary scheme) as set out in Part 2 of appendix 4;
- (8) That the Director of Finance be authorised to take all appropriate steps to implement and administer the main scheme and the discretionary scheme, including (1) publishing the main scheme in accordance with statutory requirements, (2) applying for any funding for which the Council may be eligible, and (3) responding to any other government initiatives or consultation exercises; and
- (9) That the Head of Law be authorised to make suitable amendments to the Council's constitution to reflect the council's new functions in relation to council tax reduction schemes, in particular (1) to indicate in Part 3 (Council Functions) that only the Full Council can make, revise or replace its main scheme and (2) to replace in the Schemes of Delegation to Committees and Sub-committees and to officers any references to council tax benefit with references to council tax reduction schemes.

#### **64. STATEMENT OF GAMBLING POLICY PURSUANT TO THE GAMBLING ACT 2005**

- 64.1 **RESOLVED:** That the final version of the Statement of Gambling Policy (included with the report) be adopted.

#### **65. NOTICES OF MOTION.**

##### **(a) Impact of Parking Charges on the Local Economy**

- 65.1 The Notice of Motion as detailed in the agenda was proposed by Councillor Cox on behalf of the Conservative Group and seconded by Councillor G. Theobald.
- 65.2 The Mayor then put the following motion to the vote:

"This Council notes with grave concern that visitor numbers in Brighton & Hove fell by 10.8% year on year in the first seven months of 2012 and agrees with the many local traders on the seafront and in the main shopping areas of the city who say that one of the predominant reasons for this drop in numbers was the largest increase in parking charges ever implemented. This is borne out by:

- a) figures from other seaside resorts such as Eastbourne, where visitor numbers dropped by only 3%, and Bournemouth, where numbers actually increased by over 13% during the same period.
- b) The fact that visitor numbers to Brighton & Hove decreased significantly more (over 14%) after the new parking charges were introduced in April.
- c) Targeted Budget Management figures that project a large shortfall on the extra £1.3 million income that the Administration sought from parking charge increases

Furthermore, this Council regrets that the remit of the ongoing citywide parking review does not include issues of charging and notes the concerns of local traders and businesses who feel that they have not been properly consulted as part of the review.

This Council recognises the significant environmental benefits of encouraging the use of trains, buses, bicycles and walking but also agrees that using high parking charges as a tool to force people out of their cars damages the local economy and gives the dangerous impression that Brighton & Hove is a 'rip off' city that takes both visitors and residents for granted.

Therefore, this Council resolves to call on the Transport Committee to ensure:

- a) As part of the ongoing citywide parking review, to undertake detailed financial modelling to determine the impact on the local economy of different parking charge levels both on-street and off-street (including the decision to delete certain tariffs, thus forcing residents and visitors to pay for parking for longer than they need);
- b) As part of this work, to present options to deliver a real terms decrease in parking charges particularly in the areas of the city where local businesses are suffering the most from the impact of high charges. These decreases should bring charges back in line with the level they were at in 2011/12;
- c) To carry out a specific targeted consultation with local traders and their representative organisations about the impact of the Administration's parking charge increases together with the substantial increases in Trader and Business Permits and to act on the findings of that consultation;
- d) To examine ways of making better use of the city's under-occupied car parks such as Norton Road for the benefit of both local businesses and residents;
- e) That a report covering the whole parking situation comes back to the Transport Committee meeting on 15<sup>th</sup> January to enable the findings to be fed into the Council's 2013/14 Budget."

**65.3 The motion was carried.**

**(b) Rugby World Cup Bid**

65.4 The Notice of Motion as detailed in the agenda was proposed by Councillor G. Theobald on behalf of the Conservative and Labour & Co-operative Groups. Councillor Theobald also moved a joint amendment to the notice of motion on behalf of the Conservative, Labour & Co-operative and Green Groups, which was seconded by Councillors Mitchell and Bowden.

65.5 The Mayor then put the following motion as amended to the vote:

"This Council warmly welcomes the long listing of the AMEX Community Stadium to host matches in the 2015 Rugby World Cup. It notes that should the bid, submitted with

cross party support by Brighton & Hove Albion FC, be successful it will help increase tourism, inspire young people to take up the sport and significantly boost the economy of our City. The bid has the full backing from all elected members of Brighton & Hove City Council who undertake to provide their continued support throughout the selection process, and beyond, if successful.”

65.6 **The motion was carried.**

**(c) Support Properly Funded Early Years Education and Childcare**  
**(e) Free Childcare for Disadvantaged Two-Year-Olds**

65.7 The Mayor noted that the notice of motions listed as 58(c) and 58(e) on the agenda related to the same issue and therefore stated that he proposed to take both motions under one debate but to hold separate votes on each motion.

65.8 The Notice of Motion as detailed in the agenda was proposed by Councillor Mitchell on behalf of the Labour & Co-operative Group and seconded by Councillor Gilbey.

65.9 The Notice of Motion as detailed in the agenda was proposed by Councillor Shanks on behalf of the Green and Conservative Groups and seconded by Councillor Wealls.

65.10 The Mayor then put the following motions to the vote:

- (c) “This council believes that all families in Brighton and Hove should have access to good quality, affordable early years education and childcare. It praises the work of the city’s early years providers and pledges to continue to support their valuable work. It recognises that access to childcare and early education is a vital part of maintaining a strong local economy that enables parents who wish to work to do so and where children can be helped to get off to a good start in life.

Furthermore, the council believes that properly funded family support projects and early intervention schemes such as Surestart are essential to help support struggling families and, by intervening early, to reduce future costs. It supports the free early learning places for 2 year olds being further extended to those on low incomes.

However, the council deplores the actions of the Government to effectively scrap the Early Intervention Fund in order to fund the free early learning places for 2 year olds, as confirmed by DCLG, and to also pass £300m from this fund to the Treasury for purposes that remain unclear. It notes that as a result of these actions this council will lose approximately £3m in 2013/14 from its own Early Intervention Grant funding.

This council also raises the concern that whilst there will be a statutory duty placed upon it to provide the 600 early years places needed for 2 year olds living in areas of disadvantage from September 2013, with at least 1,300 similar places needing to be provided the following year, the Government is failing to give assurances that the necessary capital funding will be made available to create the places in the areas that need them most.

This council therefore;

- Expresses its strong concern that cuts to the Early Intervention Grant will impede the council's ability to properly support vulnerable families and children in Brighton & Hove and calls on the government to fund the early years places for 2 year olds with new money;
  - Supports the actions of the Conservative Leader of the LGA who has written to Ministers asking that the Government returns to councils the £300m cut from the EIG budget that represents a 1m cut per council and;
  - Calls on the Chief Executive to write to relevant Ministers requesting that they provide adequate capital funding for the provision of the additional early years places for 2 year olds so that the Council can properly fulfil the statutory duty placed upon it."
- (e) "This council welcomes the government initiative to extend the current entitlement of 15 hours a week free childcare for three and four olds to disadvantaged 2 year olds.

The proposal to extend to the most disadvantaged two year olds from September next year and then to the most disadvantaged 40% from September 2014 should make a real difference to these children's lives. It will also enable parents to re engage with education and/or employment (paid or voluntary).

The importance of the first few years of a child's life cannot be overstated. Children who have the right support in the foundation years enjoy better health, wellbeing, and achievement in school and later life. [1]

However, while we welcome this extension we ask the government to give us clarity on funding to support this, particularly for future years. We are concerned that the shortfall could mean in adequate provision of high quality free early education, particularly in the disadvantaged areas of our city."

[1] *Supporting Families in the Foundation Years: Proposed Changes to the Entitlement to Free Early Education and Childcare Sufficiency*, Department for Education.

#### 65.11 The motions were carried.

#### (d) Council Tax Benefit Support

65.12 The Notice of Motion as detailed in the agenda was proposed by Councillor Phillips on behalf of the Green Group and seconded by Councillor Duncan.

65.13 The Mayor then put the following motion to the vote:

"This Council believes that the Government's devolution of responsibility for Council Tax Benefit support to local councils in the name of 'localism' is a cynical attempt to make councils take the blame for centrally-driven Benefit cuts. By arbitrarily reducing the amount of money transferred to councils to administer the scheme by ten per cent, it ensured that some of the most vulnerable and impoverished people in local

communities up and down the country would suffer. The Government further legislated that the new "local" schemes that councils devised had to ensure that pensioners were not adversely affected by the changes, leaving councils no choice but to pass on even bigger cuts in benefits to non-pensioners. This is neither fair nor localist, and taken with the other proposed Government changes to the Benefits System, represents a vicious attack on the less well off in our community. At the same time, Government cuts to local government funding of 25% over 4 years leave this council facing other tough choices on priorities. This council is disappointed that the localised scheme's first year of government funding assumes declining numbers of benefit claims, when all indicators suggest that numbers will be increasing. There will be no additional funding in future years for council tax support, which means that councils will be alone in bearing the costs of more benefits claims as a direct result of the government's economic mismanagement and welfare cuts. This council also deplores the government's reduced support for the administration costs councils bear when delivering the council tax support, further adding to the financial pressures facing local government.

The Council notes that unlike many councils across the country, we have agreed to reduce the cuts to benefits by transferring £1m of general funds and the establishment of a hardship fund.

In its 2013/14 budget provisions, through this and other schemes, the Council will ensure that targeted financial support is available to those households most badly affected by the Government's council tax benefit cuts.

The Council calls on the Government to restore the 10% cut made to council tax benefit and appeals to all elected representatives (councillors and MPs) in Brighton & Hove to lobby the Government to restore the full amount of council tax funding."

**65.14 The motion was carried.**

**(f) Support Extra Funding for the Local Discretionary Social Fund**

65.15 The Notice of Motion as detailed in the agenda was proposed by Councillor Fitch on behalf of the Labour & Co-operative Group and seconded by Councillor Farrow.

65.16 The Mayor then put the following motion to the vote:

"This Council notes that the government, as part of its welfare reform programme, will abolish the Crisis Loans and Community Care Grants scheme from April 2013, thereafter delegating responsibility and implementation to Local Authorities of a new scheme, the Local Discretionary Social Fund.

This Council also notes that the government is to dramatically reduce the amount of money available to local authorities for this new scheme with funding based on 2005/2006 levels of demand for the current Crisis Loan programme. As household budgets are squeezed across the city and the government's welfare reforms become a reality, the fear is that more and more people will turn to legal and illegal loan sharks in order to make up the shortfall in the help available.

This Council therefore calls on the Chief Executive to write to the Minister for the Department of Work and Pensions to ask that more money is available for the new scheme, based on current demand and the anticipated increase as a result of the government's welfare reforms."

**65.17 The motion was carried.**

**66. TWO YEAR OLD FREE EARLY LEARNING ENTITLEMENT**

- 66.1 Councillor Shanks introduced the report and noted that it had been fully supported at the Children & Young People Committee and that the question of funding to support free early learning was to be debated later under the notices of motions.
- 66.2 Councillor Mitchell stated that the Labour & Co-operative Group had requested that the report be submitted for information as it provided background to the notice of motions on that were on the agenda.
- 66.3 The Mayor noted that the report had been referred for information and moved that it be noted.
- 66.4 **RESOLVED:** That the report be noted.

**67. MINUTES - EXEMPT CATEGORY 3**

- 67.1 The part two minutes of the last meeting held on the 25<sup>th</sup> October 2012 were approved and signed by the Mayor as a correct record of the proceedings.

**68. PART TWO PROCEEDINGS**

- 68.1 **RESOLVED:** That item 67 contained in part two of meeting remain exempt from disclosure to the press and public.

**69. CLOSE OF MEETING**

- 69.1 The Mayor thanked everyone for attending and wished them all a Happy Christmas and declared the meeting closed.

The meeting concluded at 9.10pm

Signed

Chair

Dated this

day of



<b>Council</b>	<b>Agenda Item 77</b>
31 <sup>st</sup> January 2013	Brighton & Hove City Council

## **WRITTEN QUESTIONS FROM COUNCILLORS**

The following questions have been received from Councillors and will be taken as read along with the written answers which will be included in an addendum that will be circulated at the meeting:

### **(a) Councillor G. Theobald**

“Will the lead Member for Finance specifically detail how the £228k savings agreed for the Human Resources department in the 2012/13 Budget are being delivered and explain why the Administration is proposing to exempt them from any further savings in 2013/14?”

**Reply from Councillor Littman, Deputy Chair of the Policy & Resources Committee (Finance).**

### **(b) Councillor Wealls**

“Will the Chair of the Children & Young People Committee please provide an update on the proposed acquisition of the Holland Road Police Station for use as a new school?”

**Reply from Councillor Shanks, Chair of the Children & Young People Committee.**

### **(c) Councillor Brown**

“Will the Chair of the Transport Committee tell me what the impact of the new cycle lane has been on bus journey times along, and in the vicinity of the Old Shoreham Road?”

**Reply from Councillor Davey, Chair of the Transport Committee.**



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## **ORAL QUESTIONS FROM COUNCILLORS**

A period of not more than 30 minutes is set aside for oral questions from Members, at the expiry of which, the Mayor will call a halt and proceed to the next item of business of the agenda. Any Member whose question then remains outstanding will be contacted to determine whether they wish to have a written answer provided or for their question to be carried over to the next meeting.

The following Members have indicated that they wish to put questions to the Leader, Chairs of Committees or Members of the Council that have been appointed to an outside body. The Councillor asking the question may then ask one relevant supplementary question which shall be put and answered without discussion:

**(a) Councillor Wealls**

*Subject matter – Value Added in Brighton & Hove's Secondary Schools*

**Reply from Councillor Shanks, Chair of the Children & Young People Committee**

**(b) Councillor Marsh**

*Subject matter – Lewes Road Scheme*

**Reply from Councillor Davey, Chair of the Transport Committee**

**(c) Councillor Barnett**

*Subject matter – Council Housing - Gardens*

**Reply from Councillor Wakefield, Chair of the Housing Committee**

**(d) Councillor Hamilton**

*Subject matter – Career Pathways*

**Reply from Councillor J. Kitcat, Leader of the Council**

**(e) Councillor Mears**

*Subject matter – Value for Money in the HRA*

**Reply from Councillor Wakefield, Chair of the Housing Committee**



**Council**

31 January 2013

**Agenda Item 80**

Brighton &amp; Hove City Council

<b>Subject:</b>	<b>Proposed Submission City Plan Part 1</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 24 January 2013 – Policy & Resources Committee		
<b>Report of:</b>	<b>Strategic Director- Place</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Helen Gregory</b>	<b>Tel: 29-2293</b>
	<b>Email:</b>	<b>helen.gregory@brighton-hove.gov.uk</b>	
<b>Ward(s) affected:</b>	<b>All</b>		

**FOR GENERAL RELEASE****1. SUMMARY AND POLICY CONTEXT:**

- 1.1 This report seeks approval of the publication of the Submission City Plan Part 1, part of Brighton & Hove's Local Development Framework, along with its annexes and supporting documents, for a six week period of public consultation during February, March and April 2013 prior to submission to the Secretary of State for independent examination.
- 1.2 This Plan is ambitious. It responds to the difficult economic circumstances we face today and sets out a clear framework for the city's future growth and prosperity. It is a Plan that is positive about development and reflects the needs of residents and businesses now and for the next 20 years. These needs have to be balanced and accommodated in a sustainable manner, respecting and enhancing the historic, built and natural environment of the city. The City Plan will provide the framework to guide the preparation of Part 2 of the City Plan and neighbourhood plans and will allow issues of local importance to be addressed appropriately and innovatively.
- 1.3 Since consultation on the City Plan ended in July 2012, a number of additional background studies have been completed which provide further supporting information and evidence for the City Plan Part 1. The report seeks approval of these studies as background evidence to support the City Plan and further local plan documents.

**2. RECOMMENDATIONS:**

- 2.1 That Policy & Resources Committee is asked to recommend to Council that:
  - The summary of the responses to the consultation on the draft City Plan Part 1 be noted (summarised in Appendix 1 with a full schedule attached to the Statement of Consultation on city council's website, placed in the Members' Rooms and in Customer Service Centres).
  - The Proposed Submission City Plan Part 1 is agreed and published for statutory public consultation for a six week period commencing in February 2013. (Along with appendices and supporting documents).

- The document should be subsequently submitted to the Secretary of State subject to no material changes, other than alterations for the purposes of clarification, improved accuracy of meaning or typographical corrections, being necessary.
- To authorise the Head of Planning and Public Protection, to agree any draft “main modifications” to the City Plan Part 1 necessary to make it sound and to authorise the publication of such draft modifications for public consultation save that should any draft modification involve a major shift in the policy approach of the City Plan Part 1 the draft modification shall be referred by the Head of Planning and Public Protection to the Policy and Resources Committee for approval.
- To note that all modifications to the Plan will be presented to the Policy and Resources Committee and Full Council in due course as part of the adoption of the City Plan Part 1.
- Approve the following studies as supporting evidence for the City Plan and further Local Development Documents:
  - The Employment Land Study Review 2012
  - Draft Transport Assessment 2012
  - The Brighton and Hove Energy Study 2012
  - Local Housing Requirements update 2012
  - Strategic Housing land Availability assessment (SHLAA) Update 2012
  - Housing Needs Assessment 2012
  - Site capacity assessments 2012

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 In September 2011, Cabinet agreed a new work programme to prepare the City Plan to replace the withdrawn Core Strategy. Issues and Options consultation was undertaken between 17 October and 2 December 2011 on 4 policy areas (housing delivery, employment, transport - park and ride, and student housing) where a significant change of approach from the withdrawn Core Strategy was considered to be required. Informed by the Issues and Options consultation responses, significant policy changes were incorporated into the Draft City Plan:
- A local housing target of 11,300 new homes by 2030 and the identification of Toad’s Hole Valley as an additional Development Area;
  - Additional strategic allocations, identification of Central Brighton as the city’s prime office area and the identification and safeguarding of existing employment sites;
  - Removal of formal park and ride from the Sustainable Transport policy, replaced by alternative measures to intercept traffic entering the city.
  - A new Student Housing policy managing purpose built student accommodation as well as controlling the concentration of homes in multiple occupation (HMOs) in certain areas of the city.
- 3.2 Other modifications were undertaken in light of changes to government guidance including the publication of the NPPF (March 2012); updated evidence and background studies; and to reflect the intention of the South Downs National Park Authority to produce a local plan for land falling within the National Park. This general updating resulted in the restructuring of the policies within the plan under four themes (a strong and prosperous economy, a sustainable city, an attractive

city and healthy and balanced communities). The annexes supporting the City Plan - the Implementation and Monitoring Plan and Infrastructure Delivery Plan - were also updated and a Housing Implementation Strategy was prepared.

- 3.3 Following consideration by Cabinet at its meeting on 10 May 2011, the draft City Plan Part 1 and its annexes and supporting documents were subject to public consultation for eight weeks from 28 May to 20 July 2012.

### **Consultation on the draft City Plan Part 1**

- 3.4 Consultation on the draft City Plan Part 1 involved:
- Making the consultation documents available at the city libraries and customer service centres and on the council's website (and consultation portal);
  - Along with press articles, over 700 people were made aware of the consultation papers via email or letter.
  - A range of specific events including a launch and a stakeholder event (with representatives of community and amenity groups, businesses and transport providers), a bespoke event organised by the Brighton and Hove Economic Partnership, a Question Time on the regeneration aspects of the City Plan, and a meeting of the Sustainability Working Group (a sub-group of the City Sustainability Partnership). Over 120 people attended these events.
  - The draft City Plan was discussed at six partnership meetings, six Local Action Teams and a number of residents groups/ associations.
  - The draft City Plan was also discussed at a variety of other planned meetings such as the Arts and Creative Industries Commission, the special Conservation Advisory Group and the Get Involved group of the B&H Federation of Disabled People.
  - There was a leaflet drop to 3,500 households around Toad's Hole Valley, two drop in sessions were held in Hangleton for residents regarding proposals for Toad's Hole Valley. Over 250 people attended these sessions.
- 3.5 Alongside a range of comments noted from discussions at the events, 254 formal written responses were received, making over 920 separate representations and a small number of late responses. A combined paper and e-petition opposing the proposed re-designation of Toad's Hole Valley for housing and mixed use development was debated at the 25 October Full Council meeting, having exceeded the threshold with a total of 1,384 signatures.
- 3.6 Further detail is set out in the Statement of Consultation placed in the Members' Rooms, Customer Service Centres and on the website which includes a full schedule of the consultation representations received and officer responses to these. A summary is attached at Appendix 1.
- 3.7 The main representations on the Introduction and Spatial Strategy were seeking additional emphasis in the vision and objectives on specific policy areas such as affordable housing provision; recognition of the role of universities in the local economy; aspirations around sustainability and the need for new schools. In terms of the spatial strategy, concerns were raised that the City Plan had not sufficiently addressed Duty to Cooperate issues.

- 3.8 There was general support for the overall intentions of the Development Area proposals for DA1-6 and DA8. Detailed representations were made on a range of issues such as: concerns regarding the scale of development proposed (DA2 Brighton Marina, DA6 Hove Station); the degree of prescription and deliverability of policies relating to employment floorspace provision ( DA3 Lewes Road, DA4 New England Quarter and London Road, DA5 Eastern Road and Edward Street and DA6 Hove Station Area); the need for development to respect existing residential development (DA8 Shoreham Harbour and DA6 Hove Station Area); and whether there was too much or too little student accommodation identified (DA4 New England Quarter and London Road area). With regards to DA7 Toad's Hole Valley whilst the proposal was supported by a range of city partnerships there were 83 objections and 10 partial objections from local residents and residents groups on the principle of development on this open space, as well detailed concerns with the proposals notably relating to traffic.
- 3.9 There was general support for the intentions of the Special Area policies, representations were made on a range of issues. For example concerns were expressed by residents regarding the need for development to respect existing residential development along the western seafront (SA1 and also CP12 Urban Design). The Registered housing providers felt the council needed to consider further opportunities for housing development in the Urban Fringe (SA4) although other representations to SA4 wanted to see clearer protection for the urban fringe in the policy. The South Downs National Park Authority felt it was not appropriate to include a policy in the City Plan on the South Downs (SA5) given their intention to prepare a local plan for the national park area.
- 3.10 With regard to the City-wide policies, overall the intentions of the policies were supported. Policies where particular objections were raised were:
- CP1 Housing Delivery – various views on housing target and whether further urban fringe sites could be identified
  - CP3 Employment Land – whether policy was sufficiently flexibility and would delivery economic growth.
  - CP6 Visitor Accommodation – policy should be less restrictive regarding the loss of unviable hotels
  - CP8 Sustainable Building – comments regarding the standards set out in the policy and whether they were viable
  - CP9 Sustainable Transport – further detail regarding bus infrastructure improvements and need for reference to disabled parking bays.

### **The Proposed Submission City Plan**

- 3.11 The Vision for the City Plan remains unchanged. The main changes to the plan are in response to consultation representations; the findings of studies and new evidence (see Appendix 2 Summary of Main Changes to the City Plan). The majority of these changes were minor. Policies where more change was required include:
- DA5 Eastern Road and Edward Street – response to comments, capacity and viability assessment.
  - DA6 Hove Station Area – in response to comments and Employment Land Study Review 2012.



- SA5 The South Downs – in response to concerns raised by South Downs National Park Authority.
- CP3 Employment Land – to reflect the findings of the Employment Land Study Review 2012 regarding updated forecast need and supply of employment land to 2030.
- CP6 Visitor Accommodation – amending the requirements for change of use applications in response to comments by Brighton & Hove Hoteliers Association
- CP7 Infrastructure and Developer Contributions – defer decision on Community Infrastructure Levy to encourage development.
- CP8 Sustainable Buildings –in response to comments and Government-led progression of Building Regulations and to reflect findings of the Brighton & Hove Energy Study
- CP22 Traveller Accommodation – to reflect government guidance and the need for a future review of the policy to address pitch targets for remaining plan period.
- There is also a government requirement to include a new policy: ‘presumption in favour of sustainable development’ to accord with the National Planning Policy Framework.

### 3.12 The Proposed Submission City Plan Part 1 comprises:

- **Introduction and overview** – context and challenges for the City Plan.
- **Vision, objectives and Spatial Strategy** – the spatial strategy seeks a balanced and sustainable approach to accommodating growth over the plan period (to 2030). It balances the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city. Appendix 6 illustrates how the City Plan will help deliver against the principles and local targets under the One Planet approach.
- **8 Development Areas** –are identified to accommodate a significant amount of development because they are in accessible locations; they contain opportunities for change; they can deliver development of citywide or regional importance and/or because they are in need of regeneration. Proposals for strategic allocations (allocations involving significant housing, employment or other provision) within these areas and indicative amounts of anticipated development are set out alongside local priorities.
- **6 Special Areas** - areas of the city requiring a special or coordinated approach to managing future change are identified in the plan. These areas include the Seafront (SA1), Central Brighton (SA2), Valley Gardens (SA3), The Urban Fringe (SA4) and the South Downs (SA5). Proposals are also set out to improve the sustainability of residential areas of the city with the priority to reduce inequality (SA6).
- **22 City-wide policies** – set out the preferred approach to strategic policy issues such as housing, the economy, transport and shopping and are arranged under the four themes
- **A key diagram**, which illustrates the spatial strategy in broad diagrammatic terms.
- **Annexes** – Implementation and Monitoring Table, Infrastructure Delivery Plan and Housing Implementation Strategy.

- 3.13 Subject to there being no further material changes to the Plan in the light of comments, the Plan will be submitted to the Secretary of State who will appoint an Inspector to conduct an independent examination of the Plan. The Inspector will be required to test the Plan for compliance with certain statutory provisions, including whether the Plan is "sound". More information on the tests of soundness is included in Appendix 3.
- 3.14 The fact that the city's housing delivery target does not match the assessed full level of housing requirement is a soundness risk to the City Plan. The council has sought to minimise this risk by undertaking its 'duty to cooperate' with the city's neighbouring local authorities. Brighton & Hove's strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and Wealden Districts and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements and they have indicated to the council that they are unable to accommodate the city's unmet housing need. In accordance with government guidance, the council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters, including the provision for housing, over relevant strategic housing market areas and is preparing a Duty to Cooperate Statement to submit to the Inspector.
- 3.15 In testing the Plan the Planning Inspector will consider the way in which the Plan has been prepared, its content and evidence submitted by the Council together with representations received as a result of consultation. The Planning Inspector will also hold a public examination and it is anticipated that this will take place in the autumn of 2013. Adoption is then programmed for early 2014, following which, formal work will commence on City Plan Part 2 which will contain further site allocations and remaining development management policies to replace the saved policies in the Local Plan.
- 3.16 It is important that the council has an up-to date plan which sets out a strategy for accommodating housing and employment needs with other essential uses (such as retail; health; education; and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city. The National Planning Policy Framework (NPPF) was published 27 March 2012 and replaces all government planning policy statements. It should be noted that as the City Plan moves closer to adoption, the greater the weight that may be given to the draft policies contained within the City Plan depending on their compliance with the NPPF and level of support. Until the adoption of the City Plan the Brighton & Hove Local Plan will remain a material consideration weighed against the policies contained within the NPPF.

### **City Plan Supporting Documents**

- 3.17 Planning policy must be based upon a sound and robust evidence base the following documents (along with other background documents) have been commissioned to inform policy decisions. Policies in the plan have been amended to take into account the findings from these. The following statutory supporting documents are summarised in Appendix 4 and they inform and are an integral part of the City Plan:

- **Sustainability Appraisal** (which tests the extent to which the City Plan meets identified sustainable development principles)
- **Health & Equalities Impact Assessment** (which identifies potential health and equalities outcomes)
- **Statement of Consultation** (which sets out the consultation undertaken on the draft City Plan and officer responses)
- **Schedule of Changes to the Policies Map** – (proposed changes to the Adopted Policies Map to be made when the City Plan Part 1 is adopted)
- **Local Plan Policies proposed to be replaced by the City Plan Part 1-** sets out which of the saved Local Plan policies will be replaced by policies set out in the City Plan Part 1 when it is adopted.
- **Technical Background Paper – Housing Delivery**
- **Technical Background Paper – Duty to Cooperate**

### **Supporting Background Studies**

- 3.18 This report also seeks approval of the following studies that provide background and supporting evidence for the City Plan and further Local Development Documents. Full copies of each study will be available in members' rooms, in Customer Service Centres and on the website. Appendix 5 provides an outline of the purpose of the studies and a summary of the key findings. Although background studies inform the policy approach they do not determine policy:

- **Employment Land Study Review 2012**
- **Draft Transport Assessment 2012**
- **Brighton & Hove Energy Study 2012**
- **Local Housing Requirements Update 2012**
- **Strategic Housing Land Availability Assessment (SHLAA) Update 2012**
- **Housing Needs Assessments 2012**
- **Site Capacity Assessments 2012**

## **4. COMMUNITY ENGAGEMENT AND CONSULTATION**

- 4.1 A Statement of Consultation has been prepared which details the stages of consultation undertaken on the draft City Plan Part 1, the consultation responses received through formal written responses and at the various consultation events and officer responses to address these representations.
- 4.2 The Cross-Party Working Group on the City Plan met on 14 September and 22 November and was advised of the outcomes of the draft City Plan Part 1 consultation and the proposed main changes to be made to the plan as a result of the consultation responses. The Group was also made aware of other changes required to bring the Plan up to date and to reflect updated background and supporting evidence.
- 4.3 Consultation on the Proposed Submission City Plan will accord with the approach and standards set out in the council's adopted Statement of Community Involvement and take into account the Community Engagement Framework (the city council's policy for involving people, communities and stakeholders in preparing plans). The statutory consultation period is for at least six weeks rather than the twelve week requirement set out in the Community Engagement

Framework and comments will largely relate to soundness issues (see appendix 4).

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 5.1 Revenue: The costs of preparation and consultation for the City Plan, and of holding an examination, will be met from within existing Planning Strategy and Projects revenue budgets, along with a special budget allocation made for the examination.

Finance Officer Consulted: Karen Brookshaw Date: 05/12/12

### Legal Implications:

- 5.2 Once adopted, the City Plan Part 1 will be a Development Plan Document ("DPD") within the meaning of the Planning and Compulsory Purchase Act 2004 and will be a material consideration in the determination of planning applications. The detail as to the preparation of this type of document is found in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 of the 2012 Regulations provides that, prior to submission to the Secretary of State for independent examination, a DPD must be publicised for a period of at least 6 weeks and representations invited. Any representations received by the local planning authority within the timescale set out will be forwarded to the Secretary of State.
- 5.3 It is not considered that any adverse human rights implications arise from the Report.

Lawyer Consulted: Hilary Woodward Date: 04/12/12

### Equalities Implications:

- 5.4 A Health and Equalities Impact Assessment has been undertaken on the draft City Plan to inform the final version of the City Plan Part 1. The outcomes of this are summarised in Appendix 4.

### Sustainability Implications:

- 5.5 A statutory Sustainability Appraisal has been produced to inform the preparation of the City Plan Part 1.

### Crime & Disorder Implications:

- 5.6 The City Plan Part 1 addresses crime and disorder through development areas, special area policies and a number of citywide policies.

### Risk and Opportunity Management Implications:

- 5.7 Risks to the project are regularly reviewed at project meetings. A major risk is if the plan were to be found unsound by the Planning Inspector. As outlined in the paragraph 3.14 of report, the City Plan has sought to minimise these risks.

Public Health Implications:

- 5.8 The draft City Plan addresses health inequalities and the healthy planning agenda through a city wide healthy city policy and where appropriate, in a number of other policy areas. The draft City Plan was subject to an Equality and Health Impact Assessment and the findings have informed the final version of the City Plan.

Corporate / Citywide Implications:

- 5.9 The City Plan will be a significant factor in steering development in the city for the next 20 years. It will contribute to delivering the Corporate Plan and plans and strategies across the city council directorates, along with the Sustainable Community Strategy. It will also help to deliver city-wide strategies of public and voluntary sector partners.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 This is the only practicable option if the City Plan Part 1 is to progress towards adoption.

**7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 To progress the adoption of the City Plan Part 1 in order to ensure the council has an up to date strategic planning framework for the city to replace the current Local Plan. Approval of Council is required to submit the City Plan for examination.

**SUPPORTING DOCUMENTATION**

**Appendices:**

1. Summary of Representations to the draft City Plan Part 1
2. Summary of Main Changes to the City Plan Part 1
3. Test of Soundness
4. City Plan Supporting Documents
5. Summary of Background Studies
6. How the City Plan helps to deliver against the One Planet Living principles

## **Documents in Members' Rooms**

1. Proposed Submission City Plan Part 1
2. Annex 1 Implementation and Monitoring
3. Annex 2 Infrastructure Delivery Plan
4. Annex 3 Housing Implementation Strategy
5. Sustainability Appraisal of Submission City Plan and Non-technical summary
6. Health & Equalities Impact Assessment (2012)
7. Statement of Consultation
8. Schedule of Proposed Changes to the Proposals Map
9. Local Plan Policies proposed to be replaced by the City Plan Part 1
10. Employment Land Study Review 2012 (November 2012),
11. Brighton & Hove Energy Study (November 2012)
12. Draft Transport Assessment (2012)
13. Local Housing Requirements Study – Update (Brighton & Hove)( 2012)
14. Strategic Housing and Land Availability Assessment (SHLAA) update (2012)
15. Housing Needs Assessment 2012
16. Sites Capacity Assessment 2012
17. Technical Background Paper – Housing Delivery
18. Technical Background Paper – Duty to Cooperate

## **Background Documents**

1. Cabinet 13 October 2011 – Consultation on Policy Options Papers for the New City Wide Plan
2. Cabinet 10 May 2012 – Draft City Plan Part One
3. Background Studies to the City Plan

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

Part One: Introduction	24 Respondents	Representations	Main Comments
	Support	8	<ul style="list-style-type: none"> <li>As such, the delivery of affordable housing should be a key priority for the City Plan.</li> <li>Future development plans for the city should take full account of the unique assets on the Royal Pavilion Estate, not just the Royal Pavilion, and the ambitions of the organisations</li> <li>The plan is too long and could be shortened by avoiding the repetition that is found within the development and special area policies.</li> <li>Biosphere management strategy would be best considered as one of the 'Sub-regional local strategy statements'</li> <li>Consideration should be given to the broader economic and tourism role of education and this should be reflected in the City Plan analysis/assessment.</li> </ul>
	Partly Support	11	
	Object	5	<ul style="list-style-type: none"> <li>Acknowledgement of the importance of maintaining access to sunlight for residential properties and gardens. Need an urban design framework that prevents the loss of sunlight to gardens and properties.</li> <li>Lack of sufficient information and detail on various draft policies with which to make reasoned responses.</li> <li>No evidence on working with neighbouring authorities under the "duty to cooperate" which is necessary before the City Plan can be finalised.</li> <li>Delete specific employment allocations from the Part 1 plan and undertake a thorough re-assessment of employment evidence.</li> <li>An oversupply of hotel rooms is of sufficient importance to be featured in the Challenges section 1.23.</li> </ul>
	Partly Object	3	
Total Representations		27	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

Part Two: The Strategy	31 Respondents	Representations	
	Support	26	<ul style="list-style-type: none"> <li>• Welcome the overall vision set out in part 2 of the Plan, particularly pleased to support strategic objective SO12</li> <li>• A Strong and Prosperous City - will inevitably put pressure on the environment but must not be at the cost of the surrounding countryside including in particular the South Downs National Park</li> <li>• Support for the overall aim to introduce/encourage low carbon transport - achieving a flexible transport network.</li> <li>• Support for Strategic Objective (SO)9</li> <li>• welcome the Council's commitment to taking a key role in promoting the city as a gateway to the South Downs National Park</li> <li>• City Plan Part One is the first Development Plan Document which provides a high level strategic and spatial vision plan for the future of Brighton &amp; Hove.</li> <li>• A policy should be included in the plan requiring a systematic review of the council's whole property portfolio with a view to releasing small sites for housing development.</li> <li>• the plan should carry a clear message that redevelopments would be welcome outside the conservations areas, subject to certain criteria</li> <li>• broadly supportive of the overall vision and objectives for Brighton &amp; Hove, it is extremely disappointed that there is no identification of the contribution it can make to 'A Strong and Prosperous City'.</li> <li>• Policies for the development areas and strategic allocations should not repeat citywide policy but instead should focus on outlining how and why a particular policy might be applied more or less vigorously in a particular area, or defining what the implementation of that policy would mean on the ground to aid clarity</li> </ul>
	Partly Support	27	



## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			<ul style="list-style-type: none"> <li>To ensure that these objectives are realised the City Plan policies need to be appropriately drafted to reflect these goals and decisions on the allocation of specific sites should be left to the Part 2 document where an appropriate balancing exercise can be undertaken.</li> </ul>
	Object	7	<ul style="list-style-type: none"> <li>The assessed housing requirements ..... much higher than the city can realistically accommodate</li> <li>Minor changes recommended based on the potential transition of Brighton and Hove to a low carbon City:</li> <li>Suggestion of a new policy Preferred areas for developments - linking land use with transportation</li> <li>Continue Hangleton Link Road to Shoreham Harbour - new policy</li> <li>As the city develops more housing we need to make sure that land for schools and playing fields are provided for.</li> <li>The requirements for new homes should be met in full, if the City's constraints prevent the delivery of the full amount, the City Council should ensure, in accordance with the NPPF, that neighbouring authorities help to meet the identified needs.</li> </ul>
	Partly Object	10	<ul style="list-style-type: none"> <li>The wording of the vision should ensure that these other employment generating uses are fully embraced and not unwittingly excluded</li> <li>City Plan should explicitly identify the school places and sites required for families already living in the Brighton and Hove area, and for those moving into the area, especially in parts of the city where there is already an acute shortage of school places.</li> <li>The City Plan does not appear to recognise the need to develop local food infrastructure that could enable the re-localisation of the food system</li> <li>Greater consistency needs to be shown in the City Plan towards biodiversity</li> </ul>

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			<ul style="list-style-type: none"> <li>There should be more radical policies to claw back some out of town retail sites for employment use, such as the creation of reuse/recycling/upcycling parks to help achieve the city's zero waste ambitions.</li> <li>The DPD should support a more flexible, as opposed to prescriptive approach to mixed use development on the identified sites.</li> <li>The approach to the specific allocation of sites therefore needs to be carefully balanced and the selection of one specific use (i.e. B1 employment space) should not be unduly favoured against the provision of other uses.</li> </ul>
	<b>Total Representations</b>	<b>70</b>	
<b>Part Four General Comments</b>	<b>3 Respondents</b>	<b>Representations</b>	
	Support	1	
	Partly Support		
	Object	1	
	Partly Object	1	
	<b>Total Representations</b>	<b>3</b>	
<b>General Plan Comments</b>	<b>1 Respondent</b>	<b>Representations</b>	
	Object	1	
<b>DA1 Brighton Centre and Churchill Square Area</b>	<b>17 Respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	2	<ul style="list-style-type: none"> <li>General recognition of potential benefits of redevelopment</li> </ul>
	Partly Support	11	
	Object	0	<ul style="list-style-type: none"> <li>Proposed additional retail floorspace at Churchill Square is too low and not viable</li> <li>Need for high design quality and to restore damaged streetscape around Cannon Place / Russell Square / Russell</li> </ul>

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Partly Object	4	<ul style="list-style-type: none"> <li>Road</li> <li>Objection to tall buildings.</li> <li>Variety of views expressed on transport about parking, West Street / Clock Tower improvements, pedestrian and cycle access</li> </ul>
	<b>DA1 Total Representations</b>	<b>17</b>	
<b>DA2 Brighton Marina, Gas Works and Black Rock Area</b>	<b>28 Respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	8	<ul style="list-style-type: none"> <li>Cliff height: Welcome cliff height restriction on development</li> <li>Residential targets: Support for the amount of housing identified in the Inner Harbour</li> <li>Boating &amp; leisure: Encouraged by reference to marine related activity although this should have a greater emphasis in the policy</li> <li>District Centre status: Welcome proposals to maximise opportunities for encouraging independent businesses to support District Centre status.</li> </ul>
	Partly Support	21	
	Object	8	<ul style="list-style-type: none"> <li>Lack of consistency/compatibility between 'do not breach cliff height' and minimum target of 1000 residential units in the Inner Harbour. Cliff height restriction not consistent with identification of Marina as suitable for tall buildings. Potentially undeliverable and therefore unsound</li> <li>Target residential quantity too high. Marina does not have capacity for this quantity therefore should be lowered.</li> <li>District Centre status should be removed. Retail more suited to city centre</li> </ul>
	Partly Object	5	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			<ul style="list-style-type: none"> <li>Concern that infrastructure is insufficient, e.g. ramp and sewer capacity.</li> <li>Cumulative impact with RSCH redevelopment lead to traffic congestion and local parking problems e.g. Kemp Town</li> </ul>
	<b>DA2 Total Representations</b>	<b>42</b>	
<b>DA3 – Lewes Road Area</b>	<b>20 Respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	9	<ul style="list-style-type: none"> <li>General support for the policy and strategy to develop an academic corridor along the Lewes Road</li> </ul>
	Partly Support	9	
	Object	1	<ul style="list-style-type: none"> <li>Concerns about some allocated sites in terms of allocated uses and floorspace, generally seeking increased range of uses and / or floor area (e.g. University of Sussex).</li> <li>Proposal for Ambulance Make Ready Centre on Woollards Field South</li> </ul>
	Partly Object	7	
	<b>DA3 Total Representations</b>	<b>26</b>	
<b>DA4 – New England Quarter and London Road Area</b>	<b>29 Respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	12	<ul style="list-style-type: none"> <li>London Road area regeneration supported.</li> <li>New England House supported (EP and LEP)</li> </ul>
	Partly Support	14	
	Object	3	<ul style="list-style-type: none"> <li>Student housing – proposals either: i) do not sufficiently reflect the capacity within the area for student accommodation – in particular at the Co-op Site and at Pelham Street site (policy does not reflect pre-application discussions) and Buxton's site but also the role of student housing to help with the viability to regenerate sites such as Vantage Point and Blackman Street site.</li> <li>Or Student Housing ii) would create potential impacts of late night noise nuisance and anti-social behaviour in London Road</li> </ul>

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	Partly Object	5	<p>and North Laine area; and would constrain the long term expansion plans of City College.</p> <ul style="list-style-type: none"> <li>• Viability of employment sites/ delivering new business quarter – whilst general support for employment opportunities within area, there are concerns around the viability of new/ replacement office floorspace within area – Vantage Point, Preston Road sites and at Blackman Street site. Justification for approach to a minimum floorspace, inflexible and based on out-dated evidence and contrary to NPPF. Policy should be more flexible and allow for other uses – student accommodation/ study tourism.</li> </ul>
	<b>DA4 Total Representations</b>	<b>34</b>	
<b>DA5 Eastern Road and Edward Street Area</b>	<b>17 (1 late) respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	9	<ul style="list-style-type: none"> <li>• Support for policy and strategic allocations from the Brighton &amp; Hove Economic Partnership, the Coast to Capital LEP and Cathedral Group.</li> </ul>
	Partly Support	6	
	Object	0	<ul style="list-style-type: none"> <li>• More flexibility in the range of uses allowed on strategic allocations minor changes to the policy.</li> <li>• Reduction in the amount of office space provided at Edward Street Quarter following a capacity and viability study from 30,000sqm to 20,000sqm.</li> <li>• Allow D1 education and school boarding accommodation within the range of uses allowed on Freshfield Road Business Park</li> </ul>
	Partly Object	8 (1 late)	
	<b>DA5 Total Representations</b>	<b>23 (1 late)</b>	
<b>DA6 Hove Station Area</b>	<b>DA6 - 34 respondents (+4 late)</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>• General support for the designation of area for regeneration</li> </ul>

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	Partly Support	12 (+2 late)	
	Object	9 (+1 late)	
	Partly Object	10 (+1 late)	<ul style="list-style-type: none"> <li>Concern over scale of development and impact on quality of life, traffic, capacity of railway/station, parking, infrastructure (schools, medical facilities), wind, overlooking. Loss of light, views and increase in noise especially at night - a view that local roads and infrastructure cannot cope with proposed level of development – allocate a site for a school/relocate King Alfred to DA6</li> <li>Policy too restrictive/Greater flexibility in the uses should be sought (eg include retail/leisure) (6 + 4 and 2 late respdts suggest other uses such as leisure, school, medical)</li> <li>Employment (B-Class uses) requirements too high /Employment led redevelopment approach is not appropriate/not viable/not deliverable/conflicts with NPPF. Uncertainty over the promotion of creative industries and respective 'affordable' rents – Alternative approaches include job creation; retail-led; mix of employment/housing/retail/leisure; mix of employment/housing/leisure; or, potentially housing-led approach.</li> <li>Housing numbers and type – reps seeking an increase (3) and reps seeking a decrease (4) in the housing numbers, reps seeking family houses (3), reps seeking a specified amount of 3 bed units (1), reps seeking housing for the elderly (1)</li> <li>Designate area as a District Centre</li> <li>Delete Waste Allocation – blights the area and future investment impact upon the delivery of regeneration in the area.</li> </ul>
	<b>DA6 Total Representations</b>	<b>34 (+4 late)</b>	

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<b>DA7 Toad's Hole Valley</b>	<b>115 respondents (+ 4 late)</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	13 (1 late)	<ul style="list-style-type: none"> <li>Support from citywide stakeholder like B&amp;H Economic Partnership, B&amp;H Affordable Housing Partnership and B&amp;H Friends of the Earth, Brighton Society</li> <li>Support for housing, affordable housing, mixed use development, offices and improvements to the SNCI.</li> </ul>
	Partly Support	14(1 late)	
	Object	78 (2 late)	<ul style="list-style-type: none"> <li>Objections largely from local residents, local residents' groups and local elected representatives.</li> <li>Principle of development is unacceptable on this open space and brownfield sites should be developed first.</li> <li>The proposal is unacceptable in terms of transport – the roads are too busy, King George VI Avenue is dangerous and it will lead to parking problems and pollution.</li> <li>There is no evidence that the scheme is viable and what is shown in the policy is deliverable.</li> </ul>
	Partly Object	10	
	<b>DA7 Total Representations</b>	<b>115 (+ 4 late)</b>	
<b>DA8 Shoreham Harbour</b>	<b>DA8 - 26 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	5	<ul style="list-style-type: none"> <li>Support overall proposals and reference to Port Masterplan</li> </ul>
	Partly Support	5	
	Object	7	<ul style="list-style-type: none"> <li>Concern over lack of a transport strategy</li> <li>Development should be sympathetic to existing residential development in the area</li> <li>Need to accommodate future capacity of wastewater treatment works</li> </ul>
	Partly Object	9	
	<b>DA8 Total Representations</b>	<b>26</b>	

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SA1 The Seafront	SA1 - 41 respondents	Representations	Main Comments
	Support	6	
	Partly Support	8	
	Object	19	<ul style="list-style-type: none"> <li>The most objections to SA1 were concerned with the wording for the Western Seafront that sought a greater consistency of scale, height and roofline along the north side of Kingsway. There was a concern that this suggested an acceptance of tall buildings at the north side of Kingsway (between Welbeck Road and Boundary Road) which would be inappropriate given context and character of the residential area to the north.</li> <li>Whilst some respondents objected to the amount of residential development identified at the King Alfred/RNR strategic allocations others supported the proposals but wanted to see greater clarity that leisure could be provided off-site and the amount of affordable housing to be provided. Sewerage capacity was raised as an issue to be addressed in the Strategic Allocation.</li> <li>Greater clarity requested in the policy that apart from identified sites there should be a presumption against development south of the coastal road. One representation suggested that small scale low rise development may be permitted to enhance the use of the beach for recreation.</li> <li>Several amenity groups did not agree that there had to be further plans or a 'solution' found for the West Pier.</li> <li>Issues of tranquillity, appropriate low-scale family orientated leisure facilities, improved maintenance ornamental landscape, high quality landscaping/ public art and lighting raised East of Palace and Pier to Marina.</li> <li>Issues of tranquillity appropriate low-scale landscaping around the i360 and appropriate maintenance of Hove Lawn also raised with regards the Central Seafront.</li> </ul>
	Partly Object	11	
	SA1 Total	44	



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	Representations		
<b>SA2 Central Brighton</b>	<b>SA2 - 19 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	4	<ul style="list-style-type: none"> <li>General support for the overall policy and basic aims</li> </ul>
	Partly Support	7	
	Object	3	<ul style="list-style-type: none"> <li>Concern about the tests for protecting office uses being too onerous</li> <li>Concerns about binge drinking and how to manage night time economy</li> <li>Need for clear definition of Cultural Quarter</li> <li>Housing / affordable housing provision should be recognised in policy</li> <li>Recognition of role of small retailers but doubt over need for new retail units.</li> <li>Objection to City College allocation</li> </ul>
	Partly Object	5	
	<b>SA2 Total Representations</b>	<b>19</b>	
<b>SA3 Valley Gardens</b>	<b>SA3 - 11 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	0	<ul style="list-style-type: none"> <li>General support for the principle of improving the physical environment and enhancing the green spaces to create a public park.</li> </ul>
	Partly Support	7	
	Object	1	<ul style="list-style-type: none"> <li>No outright objections but concerns regarding the impact on traffic management and potential changes to the road layout.</li> <li>The Cultural Quarter, including the Royal Pavilion estate, should be included in SA3 not SA2.</li> </ul>
	Partly Object	3	
	<b>SA3 Total Representations</b>	<b>11</b>	

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<b>SA4 Urban Fringe</b>	<b>SA4- 20 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>Support for policy aims and objectives</li> <li>Requirement for particular care over development proposed on the urban fringe of the city because of proximity to South Downs National Park</li> </ul>
	Partly Support	4	
	Object	8	<ul style="list-style-type: none"> <li>In view of city's outstanding housing shortfall and particular need for affordable housing should re-assess the urban fringe for housing opportunities. In view of proximity of SDNP, Plan may fail to convince Inspectorate that greenfield sites are worth saving to form part of city's green network. Not all parts of the urban fringe warrant same degree of protection; not all are areas of high landscape value and some land needs reassessment.</li> <li>Object – policy should contain a clearer statement to protect the local countryside from development</li> <li>Policy should contain a clearer statement to protect the local countryside from development.</li> </ul>
	Partly Object	5	
	<b>SA4 Total Representations</b>	<b>20</b>	
<b>SA5 The South Downs</b>	<b>SA5 - 13 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	1	<ul style="list-style-type: none"> <li>In general support from those who commented on policy.</li> </ul>
	Partly Support	3	
	Object	8	<ul style="list-style-type: none"> <li>Removal of the policy sought by the South Downs National Park Authority with policy discursive text inserted elsewhere in plan.</li> </ul>
	Partly Object	1	
	<b>SA5 Total Representations</b>	<b>13</b>	
<b>SA6 Sustainable Neighbourhoods</b>	<b>SA6 - 13 respondents (+ 3 late)</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	4	<ul style="list-style-type: none"> <li>Support for active aims of the policy to reduce inequalities in health and employment</li> </ul>

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	Partly Support	4 (+1 late)	<ul style="list-style-type: none"> <li>Support for the approach that includes effective partnership and effective collaborative working between sections.</li> <li>Welcomes support for defining neighbourhood forums.</li> </ul>
	Object	1	
	Partly Object	1 (+ 2 late)	
	<b>SA6 Total Representations</b>	<b>10 (+3 late)</b>	
<b>CP1 Housing Delivery</b>	<b>CP1 - 25 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	8	<ul style="list-style-type: none"> <li>Support for City Plan housing delivery target of 11,300</li> <li>Support for an approach based on capacity and availability of land for housing set against high demand/requirements for housing and a context of significant physical and environmental constraints.</li> <li>Support for balanced strategy regarding future growth of the city (ie. the need to plan for jobs and other land use requirements as well as housing).</li> </ul>
	Partly Support	4	<ul style="list-style-type: none"> <li>Support for housing within DA7 Toads Hole Valley Development Area</li> <li>Some concerns expressed re. housing shortfall and meeting the Duty to Cooperate NPPF requirement.</li> </ul>

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	Object	10	<p><i>Housing target is too low</i></p> <ul style="list-style-type: none"> <li>Housing target falls significantly short of forecast housing requirements for the city. Does not meet government policy set out in NPPF. Plan has not adequately addressed Duty to Cooperate.</li> <li>In view of city's housing requirements and particular need for affordable housing the Plan should look for more housing from the following suggested sources: urban fringe sites, re-assessment required; employment sites, more flexibility required; reassessment of existing and additional areas for taller buildings. Housing Providers</li> <li>NPPF requirement for 5 year supply +5% buffer is not demonstrated. Does not meet NPPF requirements.</li> <li>Duty to co-operate is not demonstrated to show how unmet requirements will be met.</li> <li>Plan will be found unsound.</li> </ul> <p><i>Housing target is too high</i></p> <ul style="list-style-type: none"> <li>Housing target should be lower; city is tightly constrained; city cannot accommodate an ever-growing population; development should all be within built up area and all development should be on brownfield sites; no development at Toads Hole Valley.</li> <li>A target of 10, 200 suggested.</li> <li>A target of 8,000 suggested.</li> </ul>
	Partly Object	3	
	<b>CP1 Total Representations</b>	<b>25</b>	
<b>CP2 Sustainable Economic Development</b>	<b>CP2 - 13 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	5	<ul style="list-style-type: none"> <li>Greater emphasis should be given to role for green industries/ renewable industries for job creation.</li> </ul>
	Partly Support	5	

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	Object	2	<ul style="list-style-type: none"><li>• Definition of sustainable development/ sustainable economic development required.</li><li>• In order to implement CP2, the Council must increase its housing provision so that it meets forecast requirements aligned to its economic growth aspirations</li><li>• There should be more detail in the role of skills in developing the economy and explain how it will facilitate closer links with the city's two universities and business to foster the knowledge based economy. Universities role as employment generators.</li><li>• Policy should look beyond just the modernisation and expansion of existing educational uses and embrace and support wider opportunities through the growth of educational tourism which have the potential to represent a significant positive contribution to the local economy.</li><li>• Given requirement of CP2 Part 6 to provide training schemes during the construction phase, there is no justifiable reason to require financial contributions as well (this would duplicate the requirement).</li></ul>
	Partly Object	1	
	<b>CP2 Total Representations</b>	<b>13</b>	
<b>CP3 Employment Land</b>	<b>CP3 - 17 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"><li>• Particularly support the upgrade and refurbishment of the listed industrial estates and business parks – should be a similar reference for the refurbishment of existing office stock where appropriate.</li></ul>
	Partly Support	4	

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	Object	7	<ul style="list-style-type: none"><li>• The Council needs to be sure that it is protecting sites that genuinely meet the needs of industry</li><li>• The policy is inflexible and will constrain redevelopment, investment and new job creation.</li><li>• Up to date evidence base is required to justify policy.</li><li>• Part 5 of policy should be more flexible/ encouraging of alternative uses/ mixed use development. Test of redundancy too stringent and if redundant, sites should contribute further to supply of housing/ affordable housing.</li><li>• Identified sites (land north of Newtown Road and Franklin Road Industrial Estate) for employment-led mixed use development should be released for other uses as demonstrably no longer required for that use.</li><li>• Question the employment allocations for Toads Hole Valley and Gas Work Site and need to ensure that City Plan Employment Policies do not contradict/ more restrictive than emerging policies for Shoreham Harbour.</li></ul>
	Partly Object	3	
	<b>CP3 Total Representations</b>	<b>17</b>	
<b>CP4 Retail Provision</b>	<b>CP4 6 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"><li>• General support for the overall retail aims of the City Plan and the focus on existing retail centres for new developments.</li><li>• Recognition of the role of small retailers within the city.</li></ul>
	Partly Support	1	
	Object	2	<ul style="list-style-type: none"><li>• Proposed changes to boundaries/proposed uses affecting the regional shopping centre, Hove Station area and the Marina.</li><li>• Objection to proposed local threshold of 1000 sq m to trigger impact assessment of proposals outside shopping centres.</li></ul>
	Partly Object	1	
	<b>CP4 Total Representations</b>	<b>7</b>	

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CP5 Culture and Tourism	CP5 11 respondents	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"> <li>Arts and culture support the tourism industry and contribute to the economy. Recommend policy seek through development direct net benefits to local economy.</li> <li>Creates a sense of place</li> <li>Welcome the opportunity to deliver creative industries work space.</li> <li>Need to clarify 'affordable' in relation to artists and creative industries workspace</li> </ul>
	Partly Support	6	
	Object	0	<ul style="list-style-type: none"> <li>Integrate the city's tourism offer with the SDNP and link Brighton to it's natural environment as a tourism draw</li> <li>Policy should be more robust and require developer contributions that match those that are required to support sports infrastructure.</li> </ul>
	Partly Object	1	
	<b>CP5 Total Representations</b>	<b>11</b>	
CP6 Visitor Accommodation	CP6 6 respondents	Representations	Main Comments
	Support	2	<ul style="list-style-type: none"> <li>Align CP6 with CP3 and seek affordable housing as an alternative use</li> <li>Support general approach but policy should be flexible to encourage other forms of tourist accommodation e.g. study hotel</li> </ul>
	Partly Support	0	
	Object	3	<ul style="list-style-type: none"> <li>Over supply already exists. Not matched by tourist developments and therefore supply outstrips demand</li> <li>No need to protect hotel uses. Change of use to other uses should be made easier especially if unviable.</li> <li>'Hotel Core Zone' approach is not welcome. Considered too inflexible.</li> <li>Encouragement of Impact Assessment insufficient – it should be mandatory so as to assess existing supply</li> </ul>
	Partly Object	0	
	<b>CP5 Total</b>	<b>5</b>	

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	Representations		
CP7 Infrastructure CIL and Developer Contributions	CP7 14 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> <li>Part Support for developer contributions but should be weighed up against wider public benefits – and early consultation is need to ensure CIL is not a prohibitive addition to City Plan.</li> <li>Affordable Housing should be priority as community benefit but will suffer if CIL unrealistic – and should be reduced or zero-tariff on appropriate sites with high AH.</li> </ul>
	Partly Support	5	<ul style="list-style-type: none"> <li>CIL is clearly untried and untested and could lead to disputes - perhaps not appropriate for City Plan at this stage.</li> <li>CIL should be used to fund community development work.</li> <li>Particular support of policy referencing Flood Risk, Water Efficiency and Groundwater quality.</li> <li>General comments on sustainability re food production.</li> </ul>
	Object	2	<ul style="list-style-type: none"> <li>Plan seriously underplays changes needed to de-carbonise the city (to meet national CO2 reduction targets). IDP should be underpinned by policies in plan.</li> </ul>
	Partly Object	3	<ul style="list-style-type: none"> <li>Balance for setting a CIL is considered and recognised there will need to be exemptions due to viability. CIL should be simple and not affect viability. Large development should not be permitted in favour of multi-million CIL returns. CIL should not be charged to 'not for profit' organisation such as Universities – this may undermine other planning policies.</li> <li>Policy does not adequately support provision of water and wastewater infrastructure. Impacts on wastewater treatment works at Shoreham not fully considered and should be addressed in Shoreham Joint Area Action Plan (JAAP). May also impact on proposed development at Toads Hole Valley.</li> </ul>
	CP7 Total Representations	13	



## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

CP8 Sustainable Buildings	CP8 24 respondents	Representations	Main Comments
	Support	8	<ul style="list-style-type: none"> <li>Support for ambitious standards and acknowledgement of indirect advantages arising from policy approach such as the potential for development of environmental industries in the city. Recognition of the challenge of meeting the standards set in the policy and the need to consider circumstances which might influence the ability to meet the standards, particularly in terms of technical feasibility and financial viability, in particular when it comes to provision of affordable housing.</li> <li>Suggestions to incorporate into policy the potential for 'allowable solutions' (off-site compensation measures) in respect to water; protection of occupant and neighbour health, future proofing buildings for heat network connections (development areas) and minimum dwelling size.</li> <li>Request for clearer vision for energy, water and waste neutral, high-standard, cost effective, resource efficient future for the city.</li> </ul>
	Partly Support	6	
	Object	3	<ul style="list-style-type: none"> <li>Concern over costs of meeting higher levels of the Code (levels 5 and 6) and BREEAM standards and balancing out priorities. Request that council adopt a flexible approach to enable balance between priorities, and to enable consideration of factors such as financial viability that may affect the ability to meet standards,</li> <li>Concern that policy does not go far enough in terms of waste, in particular food waste, sustainable materials, heat island mitigation, water and air quality.</li> <li>Request that robust justification is required in circumstances when meeting standards might be affected by financial viability and incorporation of One Planet Living principles, in particular those for Development Areas policies.</li> </ul>
	Partly Object	8	
	<b>CP8 Total Representations</b>	<b>25</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

CP9 Sustainable Transport	CP9 33 respondents	Representations	Main Comments
	Support	6	<ul style="list-style-type: none"> <li>• More detail in policy welcomed</li> <li>• Majority of respondents accepted that formal Park + Ride is no longer deliverable due to the lack of site available and the designation of the South Downs National Park including the Economic Partnership, Local Enterprise Partnership, Conservative Group.</li> <li>• General support for proposals to better use train services at weekends and improve the service</li> </ul>
	Partly Support	15	
	Object	9	<ul style="list-style-type: none"> <li>• Transport Strategy is weak and not ambitious enough to achieve the modal shift required. There are a number of comments relating to the strategy including the need for more emphasis on improving bus service reliability and increase patronage, need for more radical solutions to reduce car use, need to retain park and ride to reduce the amount of traffic in the city</li> <li>• Partial supporters and objector raised concerns about the lack of detail set out on the proposal for Informal Park + Ride.</li> <li>• Comments ranged from a request more detail on where the sites are and how the scheme would work through to concerns that it is neither practical nor deliverable</li> <li>• Need for an updated Transport Assessment of the City Plan following major changes to the Plan.</li> </ul>
	Partly Object	2	
	<b>CP9 Total Representations</b>	<b>32</b>	
CP10 Biodiversity	CP10 13 respondents	Representations	Main Comments
	Support	5	<ul style="list-style-type: none"> <li>• Include street trees</li> <li>• Include reference to the importance of culture / community for achieving biodiversity</li> <li>• Include reference to all negative direct and indirect effects of</li> </ul>
	Partly Support	5	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			development on biodiversity
	Object	1	• Detailed textual changes to support the Biosphere initiative
	Partly Object	2	• Detailed boundary changes to NIA boundary to facilitate development.
	<b>CP10 Total Representations</b>	<b>13</b>	
<b>CP11 Flood Risk</b>	<b>CP11 1 respondent</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	1	<ul style="list-style-type: none"> <li>• Support the inclusion of policy CP11 which clearly sets out flood risk management requirements for new development in the city.</li> <li>• Support the inclusion of following aspects in policy: <ul style="list-style-type: none"> <li>- Flood risk</li> <li>- Water Efficiency in new development</li> <li>- Groundwater quality</li> <li>- Infrastructure, CIL and Planning Obligations</li> </ul> </li> </ul>
	Partly Support	0	
	Object	0	
	Partly Object	0	
	<b>CP11 Total Representations</b>	<b>1</b>	
<b>CP12 Urban Design</b>	<b>CP12 41 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	4	<ul style="list-style-type: none"> <li>• The proposal for an Urban Design Framework is supported.</li> <li>• There is some support for tall buildings.</li> <li>• There is some support for the proposed design criteria and in particular support for good contemporary design.</li> </ul>
	Partly Support	10 (+1 late)	
	Object	19	<ul style="list-style-type: none"> <li>• There are a large number of objections to the inclusion of Western Seafront / Kingsway as Tall Building Area, though some of these clarify that they are only referring to that part of Kingsway east of Welbeck Road.</li> <li>• There are some objections to tall buildings elsewhere.</li> <li>• There are objections that the policy does not clearly map each</li> </ul>
	Partly Object	8	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

			tall building area and does not specify building heights.
	<b>CP12 Total Representations</b>	<b>41(+ 1 late rep)</b>	
<b>CP13 Public Streets and Spaces</b>	<b>CP13 9 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>General support for the policy and for more shared space schemes, such as New Road, in particular</li> </ul>
	Partly Support	4	
	Object	0	<ul style="list-style-type: none"> <li>Concerns regarding the commissioning of public art. Respondents concerned about best practice, siting of art works, quality of art works and lack of public consultation.</li> </ul>
	Partly Object	2	
	<b>CP13 Total Representations</b>	<b>9</b>	
<b>CP14 Housing Density</b>	<b>CP14 15 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>Significant support for building at higher density and for the proposed density levels, with the proviso that 50dph should be seen as a minimum not a target.</li> </ul>
	Partly Support	4	
	Object	6	<ul style="list-style-type: none"> <li>Some strong concerns that higher density would fail to provide sufficient family accommodation and would lead to the loss of public open space and that setting minimum density levels is too inflexible.</li> </ul>
	Partly Object	2	
	<b>CP14 Total Representations</b>	<b>15</b>	
<b>CP15 Heritage</b>	<b>CP15 8 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>General support for the policy but this is subject to concerns that the policy should be more strongly worded and should provide greater detail about development in conservation areas.</li> </ul>
	Partly Support	4	
	Object	1	
	Partly Object	0	
	<b>CP15 Total</b>	<b>8</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Representations		
<b>CP16 Open Space</b>	<b>CP16 15 (+ 2 late) respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	2	<ul style="list-style-type: none"> <li>Redundant open space should only be developed as 100% affordable housing (2)</li> <li>Open Space standard is excessive in view of proximity to coastline and National Park and shortfall in meeting housing requirements. Re-assess to help meet housing and open space requirements. (1 + 2 raising concern)</li> <li>Conflicts with DA3 and CP21</li> </ul>
	Partly Support	6 (+2 late)	
	Object	3	
	Partly Object	4	
	<b>CP16 Total Representations</b>	<b>15 (+2 late)</b>	
<b>CP17 Sports Provision</b>	<b>CP17- 10 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	3	<ul style="list-style-type: none"> <li>No recognition in the policy or supporting text of the University's contribution to the provision of sports facilities in the City through its indoor sports centre and outdoor playing fields.</li> <li>Redundant sports buildings also present an optimum opportunity for affordable housing and where such buildings or sites are no longer suitable for sports provision the stated alternative should be 100% affordable housing.</li> <li>Contributions for new sports provision should be limited to major development only to ensure does not cause restrictive impact.</li> <li>More emphasis on sports provision, both indoor and outdoor.</li> </ul>
	Partly Support	6	
	Object	0	
	Partly Object	1	
	<b>CP17 Total Representations</b>	<b>10</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

CP18 Healthy City	CP18- 9 respondents	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"><li>Support measures to meet needs of older people but consider a specific policy required to address concerns of older people.</li><li>Need to design urban spaces to facilitate outdoor activities of teenagers</li><li>Culture of noise, disorder etc around St James’s St adversely affecting health and need to be addressed</li><li>Like to see importance of local environmental quality in supporting health acknowledged in policy</li><li>Seek commitment to safeguard and increase allotments in policy</li><li>Cost of implementing HIA for developers / red tape</li><li>Health facilities should be more widely defined – seeks wider in principle support of health facilities on all sites</li></ul>
	Partly Support	2	
	Object	1	
	Partly Object	2	
	CP18 Total Representations	9	
CP19 Housing Mix	CP19- 14 respondents	Representations	Main Comments
	Support	4	<ul style="list-style-type: none"><li>General support; housing delivery incorporating a mix including provision of affordable housing helps retention and recruitment of staff for local employers.</li><li>General support; tackles equalities issues e.g. accommodation for disabled people and space for travellers is acknowledged.</li><li>Needs of older people highlighted; accommodation for older people should not be looked at only in terms of conventional housing but should also embrace care and extra care. Plan should ensure an adequate supply of accommodation to meet the diverse needs of older people.</li></ul>
	Partly Support	4	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Object	4	<ul style="list-style-type: none"> <li>• Policy should state clearly the preferred unit size mix as a citywide aspiration for the City Plan period. Too vague at the moment. If affordable housing mix can be specified why cant mix for all housing?</li> <li>• If council wishes to improve choice/mix then it should seek to meet its forecast housing requirements.</li> <li>• Housing mix policy should not be prescriptive or imposed by the Local Authority (LA). The LA should provide for a choice of sites in a choice of locations to provide for different types of dwellings to be provided. Mix will be influenced by viability; densities and site allocation.</li> <li>• There should be a clearer statement referring to the shortage of family accommodation and need for more decent sized family housing; would like to see this addressed.</li> <li>• Policy should set out minimum dwelling size standards.</li> <li>• There should be a new separate policy that addresses housing for the elderly.</li> <li>• Role of Private Rented Sector is ignored in the Plan; yet this is the only sector expanding. Need for shared accommodation (provided through private rented sector) not acknowledged in the Plan. Numerically greatest need is for single person accommodation and plan ignores this.</li> </ul>
	Partly Object	2	
	<b>CP19 Total Representations</b>	<b>14</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

CP20 Affordable Housing	CP20 16 respondents	Representations	Main Comments
	Support	3	<ul style="list-style-type: none"> <li>General support for the affordable housing (AH) targets and the new sliding scale approach. Registered providers, BHEP and LEP</li> <li>Concern that the policy criteria in CP20 allow for too much flexibility (around achieving the AH targets) and whether this much flexibility may lead to reduced AH delivery. Request to tighten up criteria. Registered providers</li> </ul>
	Partly Support	6	<ul style="list-style-type: none"> <li>Some concerns regarding requirement to provide financial contribution for developments of 5-9 units and whether this could affect viability or the rate of schemes coming forward. Registered providers</li> <li>Recognition that provision of affordable housing assists with retention/ recruitment of staff for local employers. University of Sussex</li> <li>Request for more information/clarity around how the financial contributions secured through policy will be used in the interests of transparent local government</li> </ul>
	Object	3	<ul style="list-style-type: none"> <li>Not enough flexibility in the policy; affordable housing targets need to be applied more flexibly particularly based on financial viability assessment. 40% requirement has made many sites not viable for development.</li> <li>Requiring affordable housing provision on sites of 5-9 units could be counter-productive and negate the financial viability of these developments. Result could be less housing gets built.</li> </ul>
	Partly Object	4	
	<b>CP20 Total Representations</b>	<b>16</b>	



## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

CP21 Student Housing and Housing in Multiple Occupation	CP21- 33 respondents	Representations	Main Comments
	Support	16	<ul style="list-style-type: none"> <li>Support the approach of purpose built student accommodation.</li> <li>Concern expressed over anti-social behaviour related to HMOs and support for proposed management of location of new HMOs.</li> <li>Need for transport and other infrastructure related to student accommodation</li> </ul>
	Partly Support	7	
	Object	7	<ul style="list-style-type: none"> <li>Objection to City College allocation and suggested allocations of other sites – Co-op site, Buxtons site, Blackman Street site and Richmond House.</li> <li>Concern about criteria for assessing purpose built accommodation, particularly restriction to student use and avoiding housing / SHLAA sites. Concern over cost of purpose built accommodation and need to recognise importance of rented accommodation.</li> </ul>
	Partly Object	3	
	<b>CP21 Total Representations</b>	<b>33</b>	
CP22 Traveller Accommodation	CP22- 3 respondents	Representations	Main Comments
	Support	0	<ul style="list-style-type: none"> <li>Positive criteria for assessing suitability of future sites.</li> <li>Careful consideration must be given to any proposals on urban fringe land – due to potential impacts on National Park.</li> </ul>
	Partly Support	2	
	Object	1	<ul style="list-style-type: none"> <li>New Traveller sites should not be located in the South Downs National Park</li> <li>No mention in policy of private traveller accommodation.</li> </ul>
	Partly Object	0	
	<b>CP22 Total Representations</b>	<b>3</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

<b>Annexe (1) Implementation &amp; Monitoring</b>	<b>Annexe (1) 5 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	2	<ul style="list-style-type: none"> <li>Policy DA2 Health providers should be identified in the list of delivery partners.</li> </ul>
	Partly Support	1	
	Object	1	<ul style="list-style-type: none"> <li>Policy CP21, there is no reference to the East Slope strategic allocation despite its inclusion in the main Plan.</li> <li>There are considerable gaps on the monitoring arising from the Plan and the performance framework must be set so that it evolves and is in line with One Planet Living objectives</li> </ul>
	Partly Object	1	
	<b>Annex (1) Total Representations</b>	<b>5</b>	
<b>Annexe (2) Infrastructure Delivery Plan</b>	<b>Annexe (2) 12 respondents</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	0	<ul style="list-style-type: none"> <li>The statement that proposals should explore opportunities for district heating / combined heat and power technologies across all DA1-DA8 Development Areas should be elevated to policy</li> <li>The infrastructure delivery plan notes that mitigation may be required at several junctions on the A27 dependent upon the impacts. Clarification is requested as to how the work is progressing to understand what mitigation is required.</li> <li>Provision of affordable housing should be included within the IDP.</li> <li>Should be specific to health requirements in the area and be more explicit that the Black Rock site could be an appropriate location to deliver them It believes that a separate infrastructure provision entry is needed for this (Kemp Town area).</li> <li>Include 1) Plans for open public WiFi in city centre and tourist areas 2) Consideration of reducing light pollution at late night on the sea front</li> </ul>
	Partly Support	6	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

	Object	3	<ul style="list-style-type: none"><li>• The University of Sussex entry does not reflect information on its future development plans for the campus previously submitted to the City Council and which will be reflected in the updated master-plan currently being prepared.</li><li>• City Plans should explicitly identify the school places and sites required for families already living in the Brighton and Hove area, and for those moving into the area, especially in parts of the city where there is already an acute shortage of school places.</li><li>• IDP has not included the water and wastewater infrastructure that Southern Water identified in previous consultation.</li><li>• Capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site.</li><li>• The IDP must be underpinned by policy – especially re renewables infrastructure.</li></ul>
	Partly Object	3	
	<b>Annex (2) Total Representations</b>	<b>12</b>	
<b>Annexe (3) Housing Implementation Strategy</b>	<b>Annexe (3) respondents 2</b>	<b>Representations</b>	<b>Main Comments</b>
	Support	0	<ul style="list-style-type: none"><li>• Housing Implementation Strategy does not indicate a target or trajectory of affordable housing delivery either in percentage or actual terms.</li></ul>
	Partly Support	0	
	Object	0	
	Partly Object	2	
	<b>Annex (3) Total Representations</b>	<b>2</b>	

## Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012

Proposals Map	Proposals Map Respondents 4	Representations	Main Comments
	Support		<ul style="list-style-type: none"> <li>The development area boundary as shown on the map must be seen as indicative at this stage and will be determined through the joint Area Action Plan.</li> <li>Strong objection to a private piece of land being designated as an area of open space.</li> <li>Amendment required of the built up area boundary</li> </ul>
	Partly Support		
	Object		
	Partly Object	3	
	<b>Total Representations</b>	<b>3</b>	
Supporting Evidence Document	Supporting Evidence Document Respondents 1	Representations	Main Comments
	Support		<ul style="list-style-type: none"> <li>SFRA tends to overstate the risk of flooding from a breach of the existing defences suggesting that this would produce catastrophic flooding with little, or no, warning.</li> </ul>
	Partly Support	1	
	Object		
	Partly Object		
	<b>Total Representations</b>	<b>1</b>	
Sustainability Appraisal	SA Respondents 1	Representations	Main Comments
	Support	1	<ul style="list-style-type: none"> <li>Support of SA objective 7 amendments</li> </ul>
	Partly Support		
	Object		
	Partly Object		
	<b>Total Representations</b>	<b>1</b>	
Key Diagram	Respondents 1	Representations	Main Comments
	Partly Object	1	<ul style="list-style-type: none"> <li>The development area boundary as shown on the map must be</li> </ul>

**Appendix 1 Summary of Representations made on the Draft City Plan Part 1 2012**

			seen as indicative at this stage and will be determined through the joint Area Action Plan
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## Appendix 2 – Summary of Changes to Draft City Plan (May 2012)

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<b>New Policy</b> <b>SS1 Presumption in Favour of Sustainable Development</b>	<ul style="list-style-type: none"> <li>New policy reflecting wording in National Planning Policy Framework to be inserted into the Spatial Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>Government requirement and standard wording for all new development plans as provided by Planning Inspectorate</li> </ul>
<b>DA1 Brighton Centre Area</b> Secure a new and modern conference centre in a landmark new building to benefit the city and region and sustain the tourism economy; ensuring the redevelopment benefits the surrounding area through high quality design, townscape, public realm and biodiversity improvements and complements the seafront.  Recognises the potential for the extension of Churchill Square shopping centre (c. minimum 20,000 sq m A1 retail) and supports new hotel and leisure facilities.  Seeks to ensure high quality public and sustainable transport is provided and pedestrian and cycle access through the area and to the seafront is improved. Encourage a more diverse evening economy in the area by addressing community safety concerns along West Street and the lower seafront promenade.	<b>Minor policy text amendments:</b> <ul style="list-style-type: none"> <li>Seeking improvement to townscape and heritage assets, legibility and permeability</li> <li>Seeking balanced and diversified evening economy in West Street (in partnership with NHS and police)</li> <li>The developer should enter into a training place agreement to secure training for local people.</li> <li>Reference to district heating networks</li> <li>Amendment of 1b) text to clarify that edge of centre proposals will be determined in line with policy CP4.</li> </ul> <b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>Policy will help to deliver against the local targets under the One Planet Living principles.</li> <li>The City Council will ensure that a strategy is devised so that the redevelopment of the Brighton Centre is adequately managed and does not result in a shortfall of music/conference venue space should Black Rock not be available.</li> </ul>	<ul style="list-style-type: none"> <li>In response to representations.</li> <li>Recommendation from Health Equalities Impact Assessment (HEQIA) 2012</li> <li>Recommendation from HEQIA 2012.</li> <li>Recommendations from Energy Study</li> <li>Clarification</li> <li>Clarity.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p><b>DA2 Brighton Marina</b> Facilitate the creation of Brighton Marina as a sustainable mixed use district of the city, creating a high quality marina environment that will attract residents and visitors and extend the promenade environment up to and around the Marina and create stronger pedestrian and visual links with the sea from the Marina. This will involve ensuring a more balanced range of uses and a good mix of new housing. New development must be supported by the necessary infrastructure (health, community facilities, school places), high quality building design, townscape and public realm, biodiversity improvements, better transport infrastructure and improved pedestrian and cycle access. Opportunities for large-scale renewable energy provision are set out in the policy along with a requirement that new developments are accompanied with a Flood Risk Assessment. Overall amounts of development across the area as a whole: minimum of 1,940 additional residential units are sought together with 5,000sq m additional retail floorspace; 4,000sq m additional industrial floorspace and 9,000 sq m additional leisure and recreation floorspace. Strategic allocations are made for the Inner Harbour; the Black Rock site and the Gas Works site.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Strategy bullet points (no. 5) and Local Priority 13 reference to district heat network and infrastructure and supporting text at 3.23.</li> <li>• Strategy bullet points (no.7). Reference to non-retail floor space</li> <li>• Amend Part B and Strategic Allocations and floorspace figures: clarify 10,500 sq m leisure and recreation space overall and 4,000 sq m employment floorspace identified at Gas Work Site reduced to 2,000 sq m; update reference to NHS Brighton &amp; Hove</li> <li>• Brighton Marina Inner Harbour allocation refer to sewerage capacity;</li> <li>• Gas Work allocation amend to refer to 'a minimum of' (85 residential units) and land contamination</li> <li>• Black Rock allocation - refer to National Cycle Network.</li> <li>• Para 3.6 – add sentence to investigate opportunities to reduce freight journeys into the city</li> <li>• <b>Minor supporting text amendments:</b></li> <li>• Refer to District Shopping Centre.; word 'sustainable' and one planet living approach</li> <li>• Reference to abnormal costs</li> <li>• New paragraph 3.16. regarding employment use on Gas Works</li> <li>• Refer to 'high quality bus interchange'; to proximity of SDNP; reflect changes to CP7;</li> </ul>	<ul style="list-style-type: none"> <li>• Reflect findings of the Energy Study. Response to representation by Coast to Capital LEP and BHEP.</li> <li>• Address Retail Study update 2011 and representations.</li> <li>• Amend error in leisure floorspace figure; respond to representations and findings of the Employment Land Study</li> <li>• Update. Reflect changes in structure of health provision</li> <li>• To address comments by Southern Water about infrastructure.</li> <li>• Address issues raised by Coast to Capital LEP and BHEP about contamination and deliverability of housing</li> <li>• Address representations</li> <li>• in response to the Transport Assessment</li> <li>• Address comments about viability</li> <li>• Update – Employment Land Study Review 2012 and representations</li> <li>• Address representations</li> <li>• consistency</li> </ul>



City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p><b>DA3 Lewes Road</b>  Strategy is to promote and enhance the role of this area for higher education in Brighton &amp; Hove. Also to facilitate improved sustainable transport infrastructure to encourage different transport uses and reduce the impact of traffic; secure improvements to the townscape, public realm and air quality; deliver biodiversity improvements and additional amounts of housing, student housing, employment and community facilities to increase opportunities for and to meet the needs of the local communities.</p> <p>Strategic allocations are made for Preston Barracks and Brighton University; Woollards Field South and Falmer released land (former Falmer High School). Overall amounts of development: 885 residential units; 15,600 sq m employment floorspace; 16,000 sq m Business School and academic floorspace; 1300 student rooms and Community Building at Bevendean.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Add reference to protecting setting of National Park</li> <li>• Added reference to employment opportunities</li> <li>• Policy A 5 Add “accessible” before “shopfronts.”</li> <li>• Policy A 7 Add “or traffic noise.”</li> <li>• Amended figure for number of residential units from 885 to 810</li> <li>• Add new A9 to policy to work with ESCC and Highways agency to improve performance of Falmer interchange.</li> <li>• Added references to connections to water supply and sewerage systems and to protection of groundwater</li> <li>• Added reference to need for training place agreement</li> <li>• Reference to district heating networks</li> <li>• <b>Minor supporting text amendments:</b></li> <li>• One Planet Living text added.</li> </ul>	<ul style="list-style-type: none"> <li>• Response to consultation response from South Downs National Park Authority</li> <li>• Response to HEQIA recommendations</li> <li>• Response to consultation</li> <li>• Response to consultation</li> <li>• Reflect housing delivery summary tables based on SHLAA Update 2012</li> <li>• Response to findings of the Transport Assessment</li> <li>• Response to consultation response from Southern Water</li> <li>• Response to HEQIA recommendations</li> <li>• Recommendation from Energy study</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• added reference to co-ordination with adjoining authorities for improved transport linkages</li> <li>• Added reference to public transport access to SDNP.</li> <li>• Para 3.27 – amend to “Better air and noise quality”. Amend references to bus and rail references</li> <li>• Para 3.33 of supporting text – added reference to other employment generating uses</li> </ul>	<ul style="list-style-type: none"> <li>• Response to consultation</li> <li>• Response to consultation</li> <li>• Response to consultation and Transport assessment.</li> <li>• To reflect policy and interest expressed for use as an Ambulance Make Ready Station</li> </ul>
<p><b>DA4 NEQ and London Road</b> Strategy for the area is to revitalise the London Road shopping district; create a major new business quarter for the city (incorporating an additional 20,000 sqm office floorspace across several sites) connecting London Road with the New England Quarter and maintain and enhance a “green gateway” to the city to the west of Preston Road.</p> <p>Local priorities include supporting improvements in vocational training and further education in the area; ensuring that improvements to local air quality and the public realm are achieved; improved sustainable transport measures; strengthening the links between the New</p>	<ul style="list-style-type: none"> <li>• <b>Minor policy amendments:</b></li> <li>• 3.34 – 3.36 additional text referring to NCN 20 and Providence Place; amendments to Open Market Reference and amendments to one Planet Living Reference</li> <li>• Part 6 – inclusion of reference to noise quality</li> <li>• New local priority - Development within this area will be expected to incorporate infrastructure to support heat networks subject to viability</li> <li>• Part 7 inclusion of reference to public spaces</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• In response to representation raising reference to Noise Action Plan (see LTP and JSNA)</li> <li>• In response to findings of the Brighton &amp; Hove Energy Study.</li> <li>• Improving effectiveness of policy (also reflects Lively Cities work)</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p>England Quarter, London Road and the North Laine shopping areas and strengthening the digital media and creative industries business cluster in the area by helping to ensure that workshops and premises remain affordable, appropriate and available for use.</p> <p>Strategic allocations are made to secure 20,000 sqm additional office floorspace; to safeguard New England House as the city's creative industry and digital media hub and achieve mixed use (office/residential) development at 125 – 163 Preston Road</p> <p>Overall amounts of development: 1,140 residential units; 20,000 sqm office floorspace and 300 student rooms.</p>	<ul style="list-style-type: none"> <li>• Part 8 – change of terminology of cluster as CDIT</li> <li>• Section B – amounts of development updated</li> <li>• C. Strategic Allocation 1 NEQ and London Road Area – site a) amendment employment floorspace figures</li> <li>• C. Strategic Allocation 1i) – NEQ and London Road Area – amendment reference to CDIT</li> <li>• C. Strategic Allocation 1v) – new criterion relating to local training</li> <li>• C. Strategic Allocation 2) – amend reference to CDIT</li> <li>• C. Strategic Allocation 3) – 2 new criterion</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation (Wired Sussex, BHEP and LEP)</li> <li>• Housing figures amended to reflect SHLAA 2012 update and to clarify that 300 bed spaces is not a minimum in response to representations.</li> <li>• No net loss of employment floorspace – in response to representation and findings of capacity study which indicate that there may capacity and townscape issues for additional employment floorspace and residential on this site.</li> <li>• Consistency and in response to representation (Wired Sussex, BHEP and LEP)</li> <li>• In response to HEQIA</li> <li>• Consistency and in response to representation (Wired Sussex, BHEP and LEP)</li> <li>• In response to HEQIA,</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p>relating to local training and sewerage capacity and updated housing figures</p> <ul style="list-style-type: none"> <li>• <b>Minor supporting text amendments:</b></li> <li>• 3.43- 3.44, 3.46 – 3.47 – additional text to reflect policy amendments regarding sewerage, NCN20, heat network infrastructure, noise quality and the open market</li> <li>• Addition to footnote explaining affordable workspace</li> </ul>	<p>representations (Southern Water) and in response to updated SHLAA 2012</p> <ul style="list-style-type: none"> <li>• In response to representations</li> </ul>
<p><b>DA5 Eastern Road and Edward Street</b> Secure significant improvements to the public realm and townscape by making the area more attractive, accessible and safer for residents, employees and visitors and contribute towards increased business investment in the area. Help secure additional high quality employment floorspace in the Edward Street Quarter, more efficient use of employment sites and facilitate a high quality, sustainable mixed use development on the former Municipal Market, Circus Street.</p> <p>Strategic site allocations made for the Royal Sussex County Hospital; Edward Street Quarter, Circus Street and for Freshfield Road Business Park and Gala Bingo Hall.</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>• Local priorities reference to potential for district heating;</li> <li>• Amounts of development expected at Edward Street Quarter reduced: 30,000sqm to 15-20,000sqm B1s and from 165 residential units to 65. Reference to public realm improvements and ancillary uses permitted.</li> <li>• Freshfield Road Business Park and Gala Bingo Strategic Allocation– Reduce residential units from 215 to 110.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendation for Brighton &amp; Hove Energy Study 2012</li> <li>• Consultation Response and reflects findings of a Capacity Study undertaken by Amex which indicated site capacity/ deliverability issues.</li> <li>• Response to recommendations of the Employment Land Study Update that estate is effective and serves an important role in the city.</li> <li>• In response to representations</li> </ul>

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<p>Overall amounts of development: 600 residential units; 33,200 sqm employment floorspace; 74,000 sqm hospital floorspace; 400 student rooms and 3,800 University education floorspace with Dance Studio.</p>	<ul style="list-style-type: none"> <li>• Reference to conservation areas;</li> <li>• Amendments related to policy text amendments</li> </ul>	
<p><b>DA6 Hove Station</b> Secure long term regeneration opportunities around Hove Station and enable its development as an attractive and sustainable employment-led mixed use area. Through redevelopment, secure public realm and townscape improvements focusing on the Conway Street area and the industrial/ retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane as well as public safety, environmental and open space improvements. Enhance the sustainable transport interchange at Hove Station and protect identified employment sites. Strategic allocation for Conway Street Industrial Area. Overall amounts of development: 575 residential units; 4,000 sqm employment floorspace.</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>• Change emphasis in opening paragraph from employment-led to employment focussed and emphasis on the efficient use of land through, predominantly employment and residential, mixed use developments.</li> <li>• Add to local priority – require high quality design of an acceptable height, mass and scale that takes into account impacts on factors such as townscape, strategic views and infrastructure</li> <li>• Add to local priority emphasis on open space, community facility provision and acceptable sense of place</li> <li>• Add to local priority encouraging accessibility improvements over the railway at the station and beyond.</li> <li>• Include priority on to district heating networks</li> <li>• Include priority on protecting groundwater sources from pollution and reference to sewerage capacity</li> </ul>	<ul style="list-style-type: none"> <li>• Reflect updated assessment of potential of area to accommodate additional employment floorspace – Employment Land Study Review 2012</li> <li>• In response to representations</li> <li>• Recommendations from Energy Study</li> <li>• Response to representation (Southern Water)</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>Floorspace figures revised for area as a whole: residential increased to 630 and employment floorspace amended to reflect changes to Conway Street allocation;</li> <li>Conway Street Strategic Allocation – amend amount of development from replacement (18,000sqm) and an additional 3000sqm office space and 150 residential units to replacement of 12,000sqm employment space and provide 200 residential units.;</li> <li>New criteria DA4.c.1.e the developer will enter into a training place agreement to secure training for local people</li> </ul>	<ul style="list-style-type: none"> <li>In light of updated assessment – Employment Land Study Review 2012 of the potential of the allocation to accommodate additional employment land and in response to representations</li> <li>Recommendation from HEQIA</li> </ul>
<p><b>DA7 Toad's Hole Valley</b> Secure a modern, high quality and sustainable mixed use development which achieves One Planet Living principles to help meet the strategic development needs of the city for housing, employment, education and new open space and also to improve accessibility and provide new community facilities to share with adjacent neighbourhoods.</p> <p>A strategic allocation is made for Toads Hole Valley, east of the designated SNCI Overall amounts of development: minimum of 700 residential units: 25,000 sqm employment floorspace; a new secondary school; 2 ha new public open space,</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>Part A2 local priorities and para 3.77 supporting text - Amend from One Planet Living principles to a One Planet Approach</li> <li>Part A3 local priorities and C1d relating to National Park - Amend from 'complements' the SDNP and there will be no adverse impacts to 'development should respect the setting of SDNP and its purposes</li> <li>Part A4 add development benefit - Amend to add 'training and job opportunities for local people'</li> <li>Additional part added to Section A of the policy and new sections to the supporting text and new section k to part C1. New part – provide necessary infrastructure for the</li> </ul>	<ul style="list-style-type: none"> <li>In response to protocol with Bio-Regional and in response to comments made</li> <li>Amend references to impact on National Park to standard wording in response to comments</li> <li>Amended in response to the findings of the HEQIA</li> <li>Response to comments made to objectors in relation to concerns regarding lack of infrastructure and in response</li> </ul>

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<p>supporting uses, food growing space 0.5ha; energy and green infrastructure.</p>	<p>development including water and sewerage infra. Supporting text sections added under 3.81 on connecting to water and sewerage off site.</p> <ul style="list-style-type: none"> <li>• Amend bullet 5 part B - Add ancillary to supporting uses in Part B</li> <li>• Amend C1 f - Remove first sentence – which states that development should contribute to a reduction the ecological footprint of the city</li> <li>• Part C1 j - Amend j from outlining the requirements for a Transport Assessment to addressing issues of highways safety, noise and linkages to established residential areas</li> <li>• C1k – Add ‘with connections to existing cycle infrastructure’.</li> <li>• Amend Part C1 o (formerly n) and update paragraph 3.76 supporting text - Remove reference to Supplementary Planning Document and replace with Planning Brief</li> <li>• New C1q – Add – Work in partnership with the Highways Agency and developer to improve the trunk road junction which will be addressed in planning brief</li> </ul>	<p>to Southern Water.</p> <ul style="list-style-type: none"> <li>• Editorial change for clarity – supporting uses should be ancillary only</li> <li>• In response to comments made that this may not be achievable.</li> <li>• In response to comments made – it is accepted that a TA will be required as part of the planning application.</li> <li>• In response to Transport Assessment</li> <li>• Planning Brief is a preferred approach and in response to comments</li> <li>• In response to the Transport Assessment</li> </ul>

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	<p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Para 3.75 Minor wording changes</li> <li>• Para 3.77 reference to sustainable building mitigation measures to achieve standards</li> <li>• Para 3.79 Additional explanation for the density range set out in the policy.</li> <li>• Para 3.80 start - Amend wording on amount of office/emp floorspace to remove range and have a minimum of 25,000sqm</li> <li>• Para 3.80 end - Amend wording relating to possible informal Park and Ride emphasising it 'may' be considered subject to meeting criteria in policy CP9</li> <li>• Amend C1j and new paragraph 1 below 3.81 New part j to policy text and explanatory text on Energy Study and District Heating Networks</li> <li>• New paragraph 3 below 3.81 Phasing Development – paragraph added seeking community and supporting uses to be completed prior to occupation of the first phase of residential accommodation.</li> <li>• New paragraph 3 below 3.81</li> <li>• Para 3.83 Reference added to providing off-street parking in accordance with maximum</li> </ul>	<ul style="list-style-type: none"> <li>• Editorial – more clarity</li> <li>• In response to the Energy Study</li> <li>• In response to comments</li> <li>• For clarity and to correspond more closely with the wording of the policy.</li> <li>• Amended in response to comments</li> <li>• In response to the findings of the Energy Study</li> <li>• In response to the findings of the HEQIA and in response to concerns raised by local residents</li> <li>• Office development should be delivered alongside the residential phases of development.</li> <li>• In response to concerns raised by local residents</li> </ul>



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	<p>parking standards</p> <ul style="list-style-type: none"> <li>• para 3.83 – add ‘and designated national cycle routes.</li> <li>• Para 3.88 Editorial amendments to wording.</li> <li>• Para 3.77 Two bullet points added in relation to environmental sustainability</li> <li>• New 3.84 supporting text added relating to work to be done on trunk road network with the Highways Agency</li> </ul>	<ul style="list-style-type: none"> <li>• In response to the Transport Assessment</li> <li>• Editorial only to improve clarity</li> <li>• In response to the recommendations of the SA.</li> <li>• In response to the Transport Assessment</li> </ul>
<p><b>DA8 Shoreham Harbour</b>  Strategy for this broad location is to deliver high quality sustainable mixed use developments including new housing, employment space, leisure opportunities, improved public realm and associated supporting infrastructure including flood defences and measures to encourage the use of sustainable transport. Strategy also recognises the consolidation and enhancement of the operations of Shoreham Port and the role it will play in the local economy.  A Joint Area Action Plan (JAAP) is being prepared in partnership with Adur District Council and West Sussex County Council that will contain detailed policies for the harbour area. Overall amounts of development falling within Brighton &amp; Hove part of the harbour area to be further tested through the JAAP process: 400 residential</p>	<ul style="list-style-type: none"> <li>• New point c) added to subsection i). South Quayside/Port Operational referring to Waste Water Treatment Works</li> <li>• Point d) subsection i) policy wording amended</li> <li>• Point e) in subsection i. "non-port operations" amended to "uses not requiring a port location".</li> <li>• Under subsection ii) point c) amended to read "...To accommodate appropriately located mixed-use residential development, in accordance with a future brief that will form part of the JAAP."</li> </ul>	<ul style="list-style-type: none"> <li>• To reflect Southern Water's comments on the need to provided for potential expansion of the Shoreham Waste Water Treatment Plan (in Adur)</li> <li>• Minor editorial amendment to reflect comments received and to clarify intent.</li> <li>• Minor editorial amendment to clarify intent.</li> <li>• For clarification, to reflect emerging development briefs and consistency with iii)b).</li> </ul>

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units; 7,500 sqm additional employment floorspace.	<ul style="list-style-type: none"> <li>• Character Area ii). Point d) moved to point e)</li> <li>• Character Area iii, point b). delete " and promote a comprehensive redevelopment approach" and "mixed-use"</li> <li>• Character Area iv, point a) "and beach environment " added</li> <li>• Paragraph 3.95. New sentence added at end of Paragraph</li> <li>• New Paragraph 3.96 added.</li> <li>• New paragraph 3.97 on mineral wharves added</li> </ul>	<ul style="list-style-type: none"> <li>• Minor editorial amendment.</li> <li>• To reflect approach within emerging Development Brief that have indicated a comprehensive redevelopment approach is unlikely to deliverable in the short-medium term given fragmented land ownership and concerns over loss of employment floorspace.</li> <li>• For clarity in response to representations received.</li> <li>• To reflect the fact the Partnership will support the needs of existing businesses.</li> <li>• For clarity and consistency with the Adur Local Plan</li> <li>• To indicate the City Plan is aware of wharves issue which is dealt with in Minerals Local Plans.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Paragraph 3.98. Various amendments</li> <li>• New paragraph 3.99</li> <li>• New paragraph 3.100</li> <li>• New paragraph 3.101</li> <li>• Various (small) amendments to wording</li> </ul>	<ul style="list-style-type: none"> <li>• To improve understanding of policy</li> <li>• Explanation of issues regarding Waste Water Treatment plant in response to Southern Water's comments.</li> <li>• New paragraph subsequently revised to reflect findings of Strategic Energy Study</li> <li>• New standard paragraph added to address One Planet approach</li> <li>• To clarify intent of policy and for consistency.</li> </ul>
<p><b>SA1 Seafront</b>  The council will work in partnership to ensure the ongoing regeneration and maintenance of the seafront in an integrated and coordinated manner.  Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity and consider options for small</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Local priorities - Promote high quality architecture urban design and public art; reference to noise quality</li> <li>• Reference to district heating networks</li> <li>• Western seafront – townscape improvements should respect local context; reference to improvement of strategic cycle route;</li> <li>• Central Seafront – reference to Hove Lawns; editorial changes to West Pier bullet point</li> <li>• East of marina reference to geological interest</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• To reflect recommendations of Energy Study.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p>scale renewable energy provision. Priorities are set out for the Western Seafront; Central Seafront; East of Palace Pier to the Marina and East of the Marina. A strategic allocation is made for the King Alfred/ RNR site to ensure the replacement of sports facilities and to provide a mixed use development including 400 residential units.</p>	<p>and SDNP</p> <ul style="list-style-type: none"> <li>• King Alfred/ RNR strategic allocation – reference to connect to the sewerage system off-site at the nearest point of adequate capacity;</li> <li>• training place agreement to secure training for local people,</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• editorial amendments for clarity of wording</li> <li>• reference to emerging Seafront Strategy</li> <li>• role of the seafront health and well-being</li> <li>• Presumption against proposals involving an increase in hard surfacing of the seafront at or in the vicinity of the sites of city-wide nature conservation importance.</li> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation by Southern Water.</li> <li>• In response to HEQIA recommendation</li> <li>• In response to representation; Emerging council strategy;</li> <li>• In response to HEQIA;</li> <li>• In response to representations.</li> </ul>
<p><b>SA2 Central Brighton</b> Reinforce central Brighton's role as the city's vibrant thriving regional centre for shopping, tourism, cultural, office and commercial facilities. Sets out the approach to the cultural quarter, new retail development, a balanced range of complementary evening and night-time economy uses, mixed use development, safeguarding office accommodation and securing urban realm improvements.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Where other key policy issues are addressed, the Council will welcome proposals to create flats over shops and commercial premises.</li> <li>• Reference to district heating networks</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> <li>• Reference to Stress Areas under section on Cumulative Impact Zone</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation.</li> <li>• To reflect recommendations of the Energy Study</li> <li>• In response to representations.</li> </ul>

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<p><b>SA3 Valley Gardens</b> The council will work with public and private sector partners to enhance and regenerate the Valley Gardens area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of traffic, improves air quality and creates a continuous green boulevard that reconnects the area to the surrounding urban realm.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Additional reference to safety and legibility as outcomes of improving key pedestrian and cycle links.</li> <li>• Reference to district heating networks</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• more detail on biodiversity aims of the policy;</li> <li>• reference traffic modelling to precede any traffic scheme and reference to improving the Aquarium Roundabout as part of any traffic scheme;</li> <li>• deletion of York Place as needing repairs to historic buildings and addition of reference to vacant historic buildings at Old Steine and Gloucester Place</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• To reflect recommendations of Energy Study.</li> <li>• In response to representations.</li> </ul>
<p><b>SA4 Urban Fringe</b> Sets out a framework to better manage and conserve land between the built up area boundary and the proposed South Downs National Park boundary. Sets out the approach to assessing development proposals and establishes priorities for enhancement: green network opportunities; environmental improvements; protecting ground water aquifers and the wider landscape role of the urban fringe.</p>	<ul style="list-style-type: none"> <li>• Minor policy text amendments:</li> <li>• Change to criteria e) in policy which required one or more policy objective to be met.</li> <li>• Minor supporting text amendments:</li> <li>• Remove reference to gateway facility to National Park by sustainable transport means to reflect fact that we are no longer looking for Park and Ride sites.</li> <li>• Additional minor changes to the supporting text.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations and to update the policy wording</li> </ul>
<p><b>SA5 The South Downs</b> Following the establishment of the National</p>	<p><b>Main Policy text amendments:</b></p>	<ul style="list-style-type: none"> <li>• To reflect the representations</li> </ul>

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<p>Park Authority (SDNP), work in partnership with it and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs, recognising council priorities for the national park land that falls within the city's administrative area.</p>	<ul style="list-style-type: none"> <li>• Separate DC planning policy issues re setting of National Park and additional criteria a and b, from strategic landownership issues re council priorities</li> <li>• Policy amendment to make clear Stanmer Park falls within the National Park</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Para 3.142 inclusion of National Park duty</li> <li>• Para 3.143 removal of some of the references to AONB and minor additional wording</li> <li>• Para 3.144 minor amendments</li> <li>• Para 3.145 minor amendment at start of para to be clearer on the purpose of the policy and planning controls</li> <li>• Para 3.145 addition to reference to One Planet approach</li> </ul>	<p>from the South Downs National Park Authority and to better reflect the lack of weight this plan has in respect of planning policy considerations in the National Park.</p> <ul style="list-style-type: none"> <li>• To reflect representations from the South Downs National Park Authority.</li> <li>• To reflect representations from the South Downs National Park Authority, to be more in line with legislation and to add clarity and to aid understanding of the new reference to this duty in the policy.</li> <li>• To reflect that National Park is now established. Also to reflect consultation responses.</li> <li>• To reflect representations from the South Downs National Park Authority and the amendments to the policy</li> <li>• Response to Consultation</li> </ul>

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		response and update in line with current context.
<p><b>SA6 Sustainable Neighbourhoods</b>  Relates to all residential areas and neighbourhoods in Brighton &amp; Hove. The aim is to create sustainable neighbourhoods bringing together the priorities agreed in the city's Sustainable Community Strategy and other citywide strategies. The policy provides a strategic policy for Neighbourhood Planning alongside other policies in the Plan.</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Part A9 Add references to tree planting. Tree planting added to part A9 of the policy</li> <li>• Include reference to access to public art under reference of a sustainable community. Reference to 'access to public art' added to paragraph 3.152</li> <li>• Paragraphs 3.148 (intro) and 3.152 amended to clarify that the city council will be facilitator, working with partners to deliver aims of the policy and that applicants will be expected to set out how new development addresses priorities in the policy.</li> <li>• Reference to lifetime homes has been added to Part 8. Reference to travellers added to para 3.161 of the supporting text.</li> <li>• Part 5 of policy amended to provide more clarity on how public transport access will be improved.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Composting schemes in paragraph 3.162. Reference to community composting has been extended to encouraging this across the city using the two wards cited as examples. EA standards addressed through a footnote</li> <li>• Text changes made to para 3.154 of the supporting text relating to what is expected</li> </ul>	<ul style="list-style-type: none"> <li>• In response to comments added change improves policy</li> <li>• In response to comments added change improves policy</li> <li>• In response to comments added change improves policy</li> <li>• In response to comments</li> <li>• In response to comments improves clarity and soundness</li> <li>• In response to comments</li> <li>• In response to comments</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p>from a Neighbourhood Plan (improving disabled access to local and community facilities)</p> <ul style="list-style-type: none"> <li>• Update and clarify references to the need to provide for additional school places across the city and that sites will be allocated through part 2 of the City Plan</li> <li>• Para 3.154 more information provided on Neighbourhood Forums</li> <li>• Paragraphs 3.148 (intro) and 3.152 amended to clarify that applicants will be expected to set out how new development addresses priorities in the policy.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to comments</li> <li>• In response to HEQIA findings</li> <li>• In response to HEQIA findings</li> </ul>
<p><b>CP1 Housing Delivery</b> Sets out the housing delivery strategy; the overall amount and broad distribution of new housing development in the city over the plan period to 2030. Provision will be made to achieve a minimum of 11,300 additional dwellings over the plan period.</p>	<p><b>Minor Policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Minor changes to policy wording in criteria a) and b) in Part A of the policy;</li> <li>• Changes to policy wording in criteria d) of Part A of policy. Remove figure for site allocations to be made;</li> <li>• Update figures in Part B of the Policy (distribution);</li> <li>• Minor amendments to policy wording in Part C of policy - clearer statement regarding management of housing delivery;</li> </ul> <p><b>Minor Supporting text amendments:</b></p>	<ul style="list-style-type: none"> <li>• Response to consultation representations –emphasis on efficient use of available sites across the city.</li> <li>• Improve effectiveness of policy.</li> <li>• Site allocations will be made through Part 2 of City Plan - no need to state an overall figure in Part 1 (as the figure required is likely to change.)</li> </ul>



City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>Reference to One Planet Living principles in supporting text;</li> <li>Minor amendments to supporting text ; updates to figures as necessary</li> </ul>	<ul style="list-style-type: none"> <li>In response to SHLAA 2012 Update work.</li> <li>Consistency across Plan</li> <li>Improve effectiveness of policy</li> </ul>
<p><b>CP2 Sustainable Economic Development</b> Sets out strategy to achieve sustainable economic development. Promotes inward investment opportunities; supports transition to low carbon economy; encourages a mix of employment space to come forward for development; supports provision and delivery of ICT (information and communications technology) infrastructure; supports expansion plans of hospitals, higher and further education establishments and apprenticeships, training and job opportunities for local residents.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>Reference to start up business space</li> </ul> <p><b>Minor supporting text amendments</b></p> <ul style="list-style-type: none"> <li>Reference to City Prospectus and emerging Economic Strategy Refresh;</li> <li>Reference to updated Employment Land Study Review 2012;</li> <li>Clarification of terminology - the creative, digital and information and technology sector (CDIT);</li> <li>Reference to potential for local jobs to be created through a move towards renewable energy provision in the city;</li> <li>Cross reference to definition of sustainable development</li> <li>Reference to non B use class uses (retail, leisure) as generators of employment</li> <li>Reference to local labour market and CESP priorities</li> </ul>	<p>Update in light of Employment Land Study Review</p> <p>Updates</p> <p>Update in light of Employment Land Study Review</p> <p>In response to representations</p>
<p><b>CP3 Employment Land</b> Sets out the approach to ensure that sufficient employment sites and premises will</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>Add to Part 3 – ‘....and their upgrade/ refurbishment supported.’</li> </ul>	<ul style="list-style-type: none"> <li>In response to representations</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p>be safeguarded to meet the needs of the city to 2030 to support job creation; the needs of modern business and the attractiveness of the city as a business location. Establishes a hierarchy of employment sites allocated and protected for B1, B2 and B8 uses and clarifies approach to mixed use and secondary employment sites.</p>	<ul style="list-style-type: none"> <li>• Add to Part 6 of policy 'Preparing Part 2 of the City Plan to allocate additional employment sites and mixed use allocations to help ensure employment land delivery is maintained over the plan period.'</li> <li>• Amendments to Table 5 Employment Land provision</li> </ul> <p><b>Minor supporting text amendments</b></p> <ul style="list-style-type: none"> <li>• Various amendments to the supporting text to CP3.</li> </ul>	<ul style="list-style-type: none"> <li>• As a result of the Employment Land Study Review 2012 - updated forecast requirements and supply figures indicate a quantitative shortfall in employment floorspace over the Plan period that will need to be addressed in the City Plan Part 2</li> <li>• To reflect the Employment Land Study 2012 recommendations on forecast figures for the plan period and the need for updated supply figures as a result of representations, capacity and viability studies.</li> <li>• To clarify and reflect the Employment Land Study Review 2012</li> </ul>
<p><b>CP4 Retail Provision</b> Policy to maintain and enhance shopping centres in the city. The regional shopping centre will be the focus of any future significant retail development (cross-reference to DA1) and applications for new retail development within defined shopping centres will be permitted subject to consideration of scale and mix of uses.</p>	<p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> <li>• Addition of text to table 6 footnote</li> </ul>	<p>In response to representations</p> <p>Clarification of source of figures</p>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
Applications for new edge and out of centre retail development will be required to meet the tests of the National Planning Policy Framework (NPPF)		
<b>CP5 Culture and Tourism</b> Seeks to maintain and enhance the cultural offer of the city to benefit residents and visitors. Supports the role of the arts, creative industries and sustainable tourism sector in creating a modern and exciting visitor destination with a range of high quality facilities; spaces, events and experiences. Recognises role of the South Downs as a visitor, education and recreation asset. Promotes and protects provision of affordable and appropriate arts and creative industries work spaces. Strengthens protection of cultural infrastructure and establishes approach to any proposals for changes of use.	<b>Minor policy text amendments;</b> <ul style="list-style-type: none"> <li>• Expectations that any new visitor attractions should contribute to sense of place and benefit economy;</li> </ul> <b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>• Editorial relating to policy text change;</li> <li>• Remove reference to SEEDA; refer to SDNPa;</li> <li>• Clarification around affordable workspace provision</li> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	In response to representations
<b>CP6 Visitor Accommodation</b> Supports the provision of a wide range of visitor accommodation in the city. Outlines the approach and the criteria to apply in the assessment of proposals for new hotel and guest accommodation, Updates Hotel Core Zone.	<b>Main policy text amendments</b> <ul style="list-style-type: none"> <li>• Opening paragraph of policy remove words 'and cost'</li> <li>• Part 2 – replace 'are encouraged' with 'should' with regard to preparation of Impact assessment. Whilst NPPF does not require</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation by Brighton &amp; Hove Hoteliers Association (BHHA) – cost is no longer so linked to type of accommodation.</li> <li>• In response to representations requiring a strengthened approach to assessing new</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p>impact assessment for town centre uses within defined town centre, consider current local circumstances could justify approach</p> <ul style="list-style-type: none"> <li>• Re-numbering of policy parts due to error.</li> <li>• Part 6 – new wording of tests for loss of visitor accommodation within the Hotel Core Zone and related changes to Paragraphs 4.66 and new paragraph 4.65 – 4.66 Includes new test around precedent of loss on surrounding visitor accommodation and that new use would be compatible with surrounding area.</li> </ul>	<p>hotel accommodation proposals given the significant increase in hotel bed spaces built/ committed in last 5 yrs and impact that this is having on visitor accommodation sector.</p> <ul style="list-style-type: none"> <li>• Editorial</li> <li>• In response to representations seeking a more flexible approach to assessing change of use from hotel to other uses (evidence requirements in paragraph 4.64 reduced in terms of length of marketing etc). However HCZ still retained as it is considered appropriate to focus the application of the policy to the main accommodation clusters rather than city wide. The supporting text does acknowledge that over the life time of the plan new drivers of accommodation could emerge impacting on the attractiveness of certain areas of the Hotel Core Zone.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p><b>Main supporting text amendments</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.57 – 4.58 updated text and new paragraph 4.59</li> <li>• Paragraph 4.60 updated text</li> <li>• Paragraph 4.67 – reference to work with City College Brighton &amp; Hove to encourage the creation of apprenticeship schemes/ local jobs in the visitor accommodation sector.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations regarding the need for policy to reflect the current conditions visitor accommodation sector is experiencing.</li> <li>• In response to representations regarding current conditions visitor accommodation sector is experiencing and need to ensure that proposals for new hotel accommodation are accompanied by impact assessment.</li> <li>• In response to representations by BHEP and LEP.</li> </ul>
<p><b>CP7 Infrastructure CIL and Developer Contributions</b> Sets out approach to ensure that necessary social, environmental and physical infrastructure is appropriately provided in time to serve new development in the city. Outlines approach to the Community Infrastructure Levy (CIL) and to developer</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Reduced emphasis on Community Infrastructure Levy: reference to CIL removed from policy title and parts 3 and 4 removed;</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Restructure of whole policy, so several minor textual changes. Renumbering and splitting</li> </ul>	<ul style="list-style-type: none"> <li>• To reflect economic circumstance and the need to encourage regeneration.</li> <li>• Deletion of wording “city wide” to reflect contributions being ‘directly related’. Update in line with</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
contributions.	<p>out of paragraphs for ease of reference</p> <ul style="list-style-type: none"> <li>• Para 4.67 Supporting text Insertion of wording that CIL is subject to further evidence gathering and investigation. Deletion of reference “creating sustainable neighbourhoods as a whole” which has been inserted into Para 4.68.</li> <li>• Para 4.68 Insertion reference to provision “affordable housing” and “direct mitigation” by s106 through “Infrastructure Delivery Plan” “for creating sustainable neighbourhoods as a whole”.</li> <li>• Para 4.69 Insertion of additional government guidance for clarification on seeking s106 contributions</li> <li>• Para 4.70 Insertion of additional wording</li> <li>• Para 4.71 under Local Employment requirements “young people who are NEET” – HEQIA 18/9/12 Recommendation. Deletion of word “Local” Utility infrastructure</li> <li>• Para 4.72 insertion wording of s106 requirements further detailed in “Developer Contributions Technical Guidance”.</li> </ul>	<p>current context for further emphasis for contributions to be mostly sought via s106.</p> <ul style="list-style-type: none"> <li>• Update in line with current context.</li> <li>• Update in line with current context and for Improving effectiveness of Policy</li> <li>• for improving effectiveness of Policy</li> <li>• to improve effectiveness of Policy</li> <li>• to improve effectiveness of Policy now includes</li> <li>• To update in line with current context and Improve Effectiveness of Policy</li> </ul>
<p><b>CP8 Sustainable Building</b> The council will require all development to deliver minimum standards of building</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• New reference requiring development to deliver the principles of the One Planet</li> </ul>	<ul style="list-style-type: none"> <li>• Consistency across Plan</li> </ul>

<b>City Plan Policy Number and Title and summary</b>	<b>Type of Change Proposed</b>	<b>Reason</b>
sustainability and demonstrate how proposals will address climate change mitigation and adaptation; reduce greenhouse gas emissions and avoid an expansion of the city's ecological footprint. Revised standards will be set out in other DPD documents and/or through a review of the policy.	<p>approach;</p> <ul style="list-style-type: none"> <li>• amendments to the BREEAM and CSH requirements in the pre-2016/2019 period;</li> <li>• amendment of the requirement relating to conversions;</li> <li>• additional wording relating to orientation of development;</li> <li>• additional wording relating to low carbon solutions;</li> <li>• additional reference to incorporating renewable energy technology;</li> <li>• new requirement for development to connect or contribute towards low/zero carbon energy schemes and/or incorporates provision for decentralised energy;</li> <li>• requirement that development improves the sustainability of existing buildings;</li> <li>• amended wording relating to sustainable materials;</li> <li>• commitment to provide technical guidance on meeting policy requirements.</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• additional information relating to the findings of the Energy Study;</li> <li>• additional reference committing to production of guidance, which will include options for off-site carbon compensation and opportunities to retrofit existing building stock.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• Reflect the findings of the Energy Study.</li> </ul>          <ul style="list-style-type: none"> <li>• In response to representations</li> <li>• Reflect the findings of the Energy Study</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p><b>CP9 Sustainable Transport</b> Seeks to secure an integrated, safe and sustainable transport system for the city that will accommodate new development; support the city's role as a sub-regional service and employment hub; and improve accessibility. Policy sets out priorities and traffic management measures at a regional and local level and also priorities for travel by bus, rail, cars and freight, walking and cycling and sets out a framework for parking provision.</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• New Bullet added to B3 Cars and Freight and to B4 Walking and cycling relating to disabled parking bays and wheelchair friendly access.</li> <li>• Measures – 2. Rail – amend second bullet point Bullet amended to confirm that both <u>inward</u> and outward journeys by public transport should be encouraged</li> <li>• Text added to second para of part 6 Parking Add references to guidance providing information on new technologies for example electric vehicle charging points</li> <li>• Text added to second para of part 6 Parking - Add – 'allow disabled parking bays for new development- to end of second paragraph</li> <li>• B6 Measures, Parking – text inserted – 'in accessible locations' after minimising off-street parking</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.85 Amend reference to One Planet approach to provide more clarity</li> <li>• Para 4.89 Add references to improvements to bus services beyond the city boundaries</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment requested by the Federation – Centre for Independent Living (late response)</li> <li>• Amendment in response to representation</li> <li>• Amendment made to provide clarity on content of future supplementary planning document</li> <li>• Amendment in response to representation</li> <li>• In response to the Transport Assessment</li> <li>• Amendments in response to representation</li> </ul>



City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• Para 4.89 Add references to ongoing joint working with adjoining authorities re projects on boundaries</li> <li>• Partial deletion of para 4.93 Removal of second part of para relating to locations of shopping centre improvements</li> <li>• Para 4.95 Increased emphasis on the importance of buses and how the city has secured and will continue to secure funding for improvements</li> <li>• Para 4.95 Added reference to upgrading bus information system into East Sussex</li> <li>• Para 4.96 Editorial amendment for clarity – replace particularly with including. Remove ‘Additionally’.</li> <li>• Para 4.98 Replace NRA with Network Rail</li> <li>• Add sentence seeking minimisation of car use and promoting car sharing to stations</li> <li>• Para 4.108 Remove reference to Edward Street</li> <li>• 4.109 Amend wording to soften references to committing 10% transport budget to walking and cycling</li> <li>• 4.109 add ‘capacity’ after increased train patronage</li> <li>• 4.113 Strengthen reference to importance of travel plans in promoting modal shift</li> <li>• 4.115 Clarify that the aim of the parking strategy is to reduce congestion in the city</li> </ul>	<ul style="list-style-type: none"> <li>• In response to those who raised concerns about the location of investment.</li> <li>• Editorial</li> <li>• In response to representations</li> <li>• Editorial</li> <li>• Correction</li> <li>• response to ESCC</li> <li>• response to comment</li> <li>• editorial</li> <li>• In response to the Transport Assessment</li> <li>• clarity</li> <li>• clarity</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p>centre</p> <ul style="list-style-type: none"> <li>• 4.115 Add sentence that justifies the need for disabled parking for the mobility impaired.</li> <li>• Sentence added to paragraph 4.107</li> <li>• 4.85 reference to OPL strengthened</li> <li>• 4.116 Freight Strategy – look at air quality</li> <li>• 4.123 – Travel Plans – amend text to add reference to residential development</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendation of HEQIA</li> <li>• Energy Study</li> <li>• In response to the Transport Assessment</li> <li>• In response to the Transport Assessment and clarity</li> </ul>
<p><b>CP10 Biodiversity</b> Sets out a clear strategy to conserve, restore and enhance biodiversity and promote improved access to it. Brighton and Hove is working with local partners to achieve designation of the city and surrounding area as a UN Biosphere Reserve.</p>	<p><b>Minor policy text amendment:</b></p> <ul style="list-style-type: none"> <li>• Protect existing biodiversity from noise (as well as light) pollution.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Amendments to biosphere reserve paragraph</li> <li>• Reference to role of arts and culture in involving local communities in delivering Biosphere Action Plan objectives.</li> </ul>	<p>In response to representations.</p>
<p><b>CP11 Flood Risk</b> Set out the approach to managing flood risk to accord with the recommendations of the Strategic Flood Risk Assessment and National Planning Policy Framework and ensure development incorporates flood defences and suitable arrangements for sustainable surface water drainage where appropriate.</p>	<p><b>No change</b></p>	
<p><b>CP12 Urban Design</b></p>	<p><b>Main Policy text amendments:</b></p>	

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
Sets out the general strategic design criteria expected of new development and to require highest standards of design. A city-wide urban design framework will be prepared to set out areas which should generally be preserved, areas of the city suitable for local incremental enhancement/ area-wide enhancement and identify areas which have potential for taller developments.	<ul style="list-style-type: none"> <li>• addition of design criteria relating to the setting of the National Park;</li> </ul> <p><b>Minor Supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• reference to Planning Briefs instead of design guidance and clarification on protection and enhancement of views;</li> <li>• more detail on the extent of the Kingsway/Western Seafront and Shoreham Harbour tall building areas;</li> <li>• a new paragraph giving more background detail on the tall building areas and clarifying that boundaries will be defined in the Urban Design Framework;</li> <li>• clarification that the Tall Buildings SPG will be superseded by the Urban Design Framework;</li> <li>• reference to the importance of planted green space</li> </ul>	<p>In response to representation (South Downs National Park Authority)</p> <p>In response to representations</p> <p>In response to representations</p>
<p><b>CP13 Public Streets and Spaces</b></p> <p>A framework to comprehensively improve the quality, legibility and accessibility of the city's public urban realm. Proposals will be expected to achieve consistent aims and standards and make an appropriate contribution to achieving these requirements.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• reducing signage (as well as street) clutter;</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• editorial.</li> </ul>	In response to representations
<p><b>CP14 Housing Density</b></p> <p>Outlines the criteria for assessing higher density residential developments and, in</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• refer to minimum density requirements.</li> </ul>	In response to representations

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
order to make the full and effective use of land available, sets a minimum density of 50 dph (dwellings per hectare) city wide and 100 dph within Development Areas DA1 – DA6 and DA8.	<b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>• refer to minimum density requirements.</li> </ul>	
<b>CP15 Heritage</b> Preserve and enhance the historic built environment and archaeological assets and their settings, giving greatest weight to national designations. Review the Conservation Strategy to provide a framework for future conservation area management proposals/conservation area designations.	<b>Minor policy text amendments:</b> <ul style="list-style-type: none"> <li>• add promotion of the city's heritage to the overall aim;</li> <li>• add references to settings of heritage assets and the need for positive action of heritage at risk;</li> </ul> <b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>• Additional reference made to public consultation on the review of the Conservation Strategy to inform local priorities;</li> <li>• amplification of policy change on promotion of heritage; additional explanation regarding undesignated heritage assets; and reference made to historic character informing planning briefs, SPDs and the UDF;</li> <li>• amplify that part of the policy that refers to ensuring local distinctiveness in historic areas.</li> </ul>	In response to representations.
<b>CP16 Open Space</b> Safeguard, enhance and promote access to the city's green and open spaces and beaches and promote active living. Local open space standards are set out and development will be expected to contribute to	<b>Main policy text amendment:</b> <ul style="list-style-type: none"> <li>• Added reference to the importance of the beach as an open space asset.</li> </ul> <b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>• amended to provide greater clarity over the</li> </ul>	In response to representations.

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
the provision of and improve the quality, quantity and accessibility of public open space. Overall approach is to retain open space. Approach to development in terms of acceptable losses of open space is detailed as 'exceptions' criteria in policy.	Accessibility Standards; <ul style="list-style-type: none"> <li>• reflect the latest population projections and housing trajectory;</li> <li>• amendments to make clear that new development should seek to provide open space.</li> </ul>	In response to representations  Updated information  clarity
<b>CP17 Sports Provision</b> Safeguard, enhance and promote access to the city's sports and recreation facilities. Local sports and recreation standards will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of sport and recreation facilities. Support the delivery of proposed sporting facilities to reflect the city's regional status.	<b>Main policy text amendment:</b> <ul style="list-style-type: none"> <li>• Amend Policy and para 4.172 to remove reference to Black Rock (Brighton International Arena)</li> <li>• Table in policy re additional space required by 2030, Para 4.173 and respective footnote amended to reflect the latest population projections and housing trajectory.</li> </ul> <b>Minor supporting text amendments:</b> <ul style="list-style-type: none"> <li>• Para 4.173 amended to update reference to the London 2012 Olympic Games and Paralympics and, remove reference to Nivea Sun Yellowwave Beach Sports Centre as a pre-games training venue (uptake uncertainty).</li> </ul>	<ul style="list-style-type: none"> <li>• Update in line with current situation ie there is no longer an ability to deliver the BIA. To ensure the site is used to best effect it is considered appropriate to ensure there is flexibility in potential uses. References to leisure and recreation are retained elsewhere in the plan (eg DA2 and SA1)</li> <li>• To update in line with latest population figures and findings of the Housing Requirements Study (Update of 2011 HRS Study)</li> <li>• To ensure the supporting text is up to date and appropriate for a plan that will cover a period up to 2030.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• Para 4.179 amended to include reference to area near Falmer acting as an existing sports hub</li> <li>• Para 4.179 amended to make clear the reference to maintenance programmes for sports pavilions relates only to city council premises.</li> <li>• Para 4.180 amendment to include reference to One Planet approach</li> </ul>	<ul style="list-style-type: none"> <li>• To reflect the representation from University of Sussex (92/15).</li> <li>• Improving clarity</li> <li>• Text added in response to comments made on behalf of Cook and Pecla – to include references to OPL to all DAs Enplan</li> </ul>
<b>CP18 Healthy City</b> Ensures developments, programmes and strategies are tested to ensure that they reduce adverse impacts on health, maximise positive impact on health and promote health, safety and active living for all age groups. Safeguards allotments and encourage joint working with health providers.	<b>Minor supporting text changes only</b> <ul style="list-style-type: none"> <li>• Include in paragraph 4.185 intention that HIA best practice guidance or Planning advice note will be prepared to assist developers undertaking HIA;</li> <li>• HIA's should pay special regard to sensitive communities that the HEQIA has identified as having a potential for adverse impacts;</li> <li>• Reference to Partnership working with NHS Brighton and Hove and other health care trusts and providers in the identifications of health care service provision requirements.</li> </ul>	Recommendations of HEQIA
<b>CP19 Housing Mix</b>	<b>Main Policy text changes:</b>	

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
Sets out approach to securing a mix of housing types, sizes and tenures in the city. Details demographic evidence to indicate likely balance of housing types and sizes required over the plan period based upon planned levels of housing delivery.	<ul style="list-style-type: none"> <li>Minor changes to formatting of policy.</li> </ul> <p><b>Minor supporting text changes:</b></p> <ul style="list-style-type: none"> <li>Updates within supporting text re. demographic data, housing stock data etc</li> <li>Clearer statement within supporting text re. need for family sized housing.</li> </ul>	<ul style="list-style-type: none"> <li>Clearer presentation and improve effectiveness of the policy.</li> <li>Findings of up to date study.</li> <li>Response to representations.</li> </ul>
<p><b>CP20 Affordable Housing</b></p> <p>Sets out approach to secure new affordable housing development in the city. Sliding scale of affordable housing requirements is set out reflecting the updated Affordable Housing Viability Study. Targets to secure 40% affordable housing on sites of 15+ units; 30% on sites of between 10 and 14 units and 20% financial contribution equivalent on sites of between 5 to 9 units.</p>	<p><b>Main Policy text changes:</b></p> <ul style="list-style-type: none"> <li>Clarification of 'net' dwellings in criteria a) to c)</li> <li>Amendment to policy text introducing criteria for flexibility.</li> <li>Removal of last part of policy which details 'exceptional circumstances' for providing commuted sums on larger sites as an alternative to onsite provision. Put this in supporting text instead.</li> </ul> <p><b>Minor supporting text changes:</b></p> <ul style="list-style-type: none"> <li>Update affordability data in supporting text.</li> <li>Update housing needs position in supporting text</li> </ul>	<ul style="list-style-type: none"> <li>Improve effectiveness of policy.</li> <li>Improve effectiveness of policy. Update in line with current context.</li> </ul>
<p><b>CP21 Student Housing and Houses in Multiple Occupation</b></p> <p>Identifies specific sites for purpose built student housing and sets out criteria to assess other proposals for student housing that may come forward. Sets out approach to controlling numbers of houses in multiple occupation in those areas</p>	<p><b>Minor policy text changes:</b></p> <ul style="list-style-type: none"> <li>Amend part of policy to clarify support required from an existing educational institution; change reference from 'residences' to 'dwellings';</li> </ul> <p><b>Minor supporting text changes:</b></p> <ul style="list-style-type: none"> <li>clarify proposed controls over use as student</li> </ul>	<p>In response to representations Improve clarity of policy</p>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
of the city where there is a high concentration of student lets.	accommodation; <ul style="list-style-type: none"> <li>• amended to accurately reflect status of City College site;</li> <li>• editorial changes</li> </ul>	
<b>CP22 Traveller Accommodation</b> Indicates pitch requirements to 2016 and site assessment criteria to guide site selection. Acknowledges that needs assessment will need to be reviewed to cover plan period to 2030 and sites will need to be identified to meet updated needs.	<b>Main Policy text changes:</b> <ul style="list-style-type: none"> <li>• Number of permanent pitches required in to 2019 amended from 16 to 18 and 'early review of policy may be required' added to policy.</li> </ul> <b>Main supporting text changes:</b> <ul style="list-style-type: none"> <li>• Indicating short term projected requirements to 2019, reference to site search exercise and identification of sites with potential to meet need.</li> </ul>	To align more closely with national policy guidance – Planning for Traveller Sites.



## Appendix 4 – Tests of Soundness

### NPPF paragraph 182

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

### NPPF paragraph 216

From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).



## **Appendix 5, City Plan: Supporting Documents**

### **Summary of Supporting Documents**

#### **1. Employment Land Study Review (2012)**

##### **1 Sustainability Appraisal**

The aim of the City Plan is to deliver sustainable development of the city in accessible locations and to help create cohesive and sustainable communities. The Sustainability Appraisal tests the extent to which the City Plan meets identified sustainable development principles. This is a separate independent document produced alongside the City Plan, which critically examines its objectives and options and tests them against the principles of sustainable development. As a result, the SA has led to a series of minor amendments to the Proposed Submission City Plan policies. Copies of the full Sustainability Appraisal and a non-technical summary of the Sustainability Appraisal have been made available in the Members' Rooms.

##### **2 Health & Equalities Impact Assessment**

The aim of the Health & Equalities Impact Assessment is to identify potential health and equalities outcomes, both adverse and beneficial, and their distribution amongst sensitive community groups. Each policy within the City Plan Part 1 has been appraised against a framework consisting of the key determinants of health and the potential health outcome upon sensitive community groups identified in order to address current and prevent future adverse health and equality outcomes. The Assessment considered the City Plan Part 1 policies to be well co-ordinated to address health and wellbeing outcomes throughout Brighton & Hove. The Assessment found overall that the policies include improvements to enhance existing circumstances whilst also setting objectives to steer future development within the city toward the creation of healthy, cohesive and vibrant communities. Throughout the appraisal, individual recommendations for changes to policies have been made to either prevent or reduce the potential for an adverse health or equalities outcome. Recommendations to increase the potential for beneficial outcome have also been made and these have been addressed in the amendments in the City Plan as set out in the schedule of changes in Appendix 2.

##### **3 Statement of Consultation**

This sets out the consultation undertaken on the draft City Plan and the officer responses and recommendations to the formal representations received. A summary of the consultation responses is set out in Appendix 1 and a full schedule of representations and officer responses has been placed in the Members' Rooms, City Direct Offices and placed on the city council's website.

##### **4 Schedule of Changes to the Policies Map**

This contains proposed changes to the Adopted Policies Map (formerly known as the proposals map) which will be made when the City Plan Part 1 is adopted and reflects strategic allocations within the development areas, other protected employment sites as well as any new or amended designations detailed in the City Plan Part 1. A copy of the schedule of changes to the Policies Map has been placed in the Members' Rooms, City Direct Offices and placed on the city council's website.

**5 Local Plan Policies proposed to be replaced by the City Plan Pt 1**

The Brighton & Hove Local Plan was adopted in July 2005. Many of its policies were continued to be saved by the Secretary of State in July 2008. However some of these saved policies will be replaced by policies set out in the City Plan Part 1 when it is adopted. The remaining Local Plan policies along with the City Plan Part 1 will form part of the Development Plan for Brighton & Hove. The retained Local Plan policies will continue to apply until replaced by the City Plan Part 2 Development Plan Document (due to be adopted in 2016). The Council intends to reprint the Local Plan to clearly set out the retained policies when the City Plan Part 1 is adopted. A copy of the Local Plan Policies to be Replaced document has been placed in the Members' Rooms, City Direct Offices and placed on the city council's website.

## **Appendix 5 - City Plan: New Background Studies**

### **Summary of New Background Studies**

#### **1. Employment Land Study Review (2012)**

The purpose of the review was to provide an updated assessment of employment land requirements to 2030 to inform the final version of the City Plan. The Study used a range of economic scenarios and approaches, reflecting economic growth, development trends and potential housing supply. The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 a office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council's approach to employment land should aim to at least fully meet Brighton & Hove's employment space needs over the plan period so that the City's economy is not constrained.

However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms. The Study concluded that it will be important for the City Plan Part Two to give consideration to how these unmet needs can be addressed to ensure that the City can accommodate future business growth and achieve its economic potential. A key challenge identified by the Study is the need to encourage greater delivery of office space, particularly in Central Brighton.

#### **2. Brighton & Hove Energy Study (2012)**

This strategic energy study, undertaken by consultants AECOM, analysed energy use and carbon emissions from existing and planned development within the Brighton & Hove boundary for the Plan period. Analysis was undertaken of opportunities and constraints for decentralised and renewable energy technologies in particular district heat networks; and scenarios for carbon emissions reduction from existing buildings. The study also assesses proposed City Plan sustainable building targets within CP8 which address carbon emissions from proposed development. The research has led to the creation of a current baseline of energy use and scenarios for carbon reduction during the City Plan period to 2030. This models the challenging Sustainable Community Strategy target of 42% CO<sub>2</sub> reduction by 2030 and continues the trajectory on through the Plan period giving an overall 56% CO<sub>2</sub> reduction target by 2030.

The Study indicates opportunities for:

- A greater emphasis on reducing emissions from existing stock;
- Significant potential for district heating. A heat map identifies a long list of fourteen heat propriety cluster areas with an enhanced potential for

district heating networks, three are explored in greater detail developing technical and financial modelling.  
Enhanced encouragement of renewables, referring to specific opportunities for technologies and capacity (and some constraints) in specific areas of the city.

The study also made recommendations on the City Plan targets for sustainable buildings set out in CP8 in order to address issues of deliverability and viability. Recommendations support the flexible approach to implementation of CP8 standards set out in this policy; identifies the challenges of achieving higher sustainability standards; promotes production of guidance as a way of addressing particular challenges such as retrofit in conservation areas; carbon mitigation; and district heating.

### **3. Draft Transport Assessment (2012)**

JMP Consultants was commissioned by the city council to produce a Strategic Transport Assessment of policies and proposals in the City Plan Part 1. The overall purpose of the Assessment is to review the impact of committed developments and strategic land allocations, providing an evidence base for the City Plan.

The base transport model for the assessment has been developed from an existing SATURN model and validated using recent travel surveys from 2010 and the public transport and demand model elements have been developed from first principles. From this base model three future forecast year scenarios were developed for assessment (morning and evening week day peak period):

- 2030 City Plan Reference Case – base model plus committed developments and transport schemes plus the strategic development sites identified in the City Plan.
- 2030 Committed base – 2030 City Plan Reference Case less the development areas. This scenario was compared to the 2030 City Plan Reference Case to reveal the changes to the operation of the public transport and highway network arising from the development to assist in identifying potential mitigation measures.
- 2030 City Plan - 2030 City Plan reference Case plus the resultant additional mitigation measures identified by comparing it with the 2030 Committed Base.

In summary the findings of the Strategic Transport Assessment are that the 2030 City Plan Mitigation strategy would:

- Ensure that growth in public transport trips will outstrip highway trips by ratios of at least 2.5 to 1.
- Mode Share will increase across all areas of Brighton but with the largest increases for trips with an origin or destination in the urban core. Public Transport Mode Share will be significantly higher in 2030 compared to 2010 with increases of between 6% and 9%.

- Mitigation will reduce vehicle kilometres on the network in the 2030 morning peak in the urban core towards levels experienced if there were no Development Areas. In the evening peak, vehicle kilometres in the urban core in the 2030 mitigation scenario would be less than in the 2030 committed case. This indicates that further mitigation will be effective in reducing the impact of development trips on the urban core.
- Overall vehicle kilometres across Brighton will be broadly similar in all 2030 scenarios. This suggests that the impact of trips generated by the Development Areas can be largely mitigated without a significant deterioration in network performance.

In addition to the strategic modelling undertaken, Strategic Road Network (trunk road) mitigation analysis was undertaken at a more localised level. The analysis revealed that many of the junctions on the A27 will operate in excess of capacity with blocking back onto the mainline by 2030 irrespective of whether the City Plan development sites are built and occupied. The Development Areas would not significantly worsen the operation of these junctions (other than perhaps Toads Hole Valley). However a package of junction improvements could be developed which would enable traffic to more efficiently leave the A27, with reduced queuing affecting the mainline carriageway.

#### **4. Local Housing Requirements Update (GL Hearn 2012)**

The City Council commissioned consultants GL Hearn to update the June 2011 Housing Requirements Study modelling to take account of new information in order to ensure that the council's planning policies are based on the most up to date information. The update report is intended to be an appendix to, and be read alongside, the 2011 Brighton & Hove Housing Requirements Study (HRS, June 2011). The 2012 Update takes account of the following information:

- Publication by the Office for National Statistics of 2010 based Sub National Population Projections in March 2012 and 2011 based interim projections covering 2011 to 2012 (published September 2012).
- Initial release of 2011 Census data in July 2012, providing new information on the City's population by age and sex and the number of households which was subsequently updated September 2012.

The report provides revised projections of housing requirements based on demographic trends, an understanding of demographic components of change and a consideration of how economic growth could influence housing requirements. It also considers the implications of the potential supply of land for residential development in the city, providing revised modelling of the 'housing trajectory' scenario presented in the earlier March 2012 Supplementary Paper.

The report suggests that the most realistic projection of future (unconstrained) housing requirements for the city indicates a requirement for an additional 15,800 dwellings over the 2010 – 2030 plan period (equivalent to 790 homes per annum). This projection takes account of the most recent demographic data; takes account of how migration patterns may be influenced by changes in the population age structure both in the City and in areas from which there is typically migration to the City.

The slightly lower estimate of housing need/demand relative to the June 2011 Study (which indicated a range between 15,800 to 19,400 over the Plan period) reflects the evidence of higher current household sizes in the city revealed by the 2011 Census data which results in slightly more moderate forecasts of future reductions in household sizes moving forward. In addition, the 2011 based interim SNPP project a slightly lower level of net migration than earlier 2008 and 2010 based versions. There are also some moderate effects in the future from differences in the population age structure in 2011 and how this is expected to change moving forwards.

## **5. SHLAA Update (2012)**

The Strategic Housing Land Availability Assessment (SHLAA) is updated annually to take account of the latest annual residential monitoring exercise and any further technical work regarding development site capacity and viability.

The SHLAA site and summary schedules illustrate actual and anticipated residential development over the City Plan timescales 2010 – 2030. The schedules also illustrate what is expected to be delivered spatially across the city in terms of the eight Development Areas (DA1 – DA8) indicated in the City Plan Part one across the Rest of the City.

The 2012 SHLAA Update indicates there is potential capacity for around 11,500 dwellings to be delivered over the plan period. A 'housing trajectory' indicates the rate at which development is anticipated to come forward. This indicates that delivery over the first four years of the plan period is likely to be at a lower rate than the City Plan annualised average target (565 dwellings per annum) reflecting a slow recovery from the economic recession. However, development is anticipated to reach and exceed the plan annualised target over the course of the plan period.

## **6. Assessment of Affordable Housing Need (GL Hearn, December 2012)**

This study provides an assessment of housing need in the city. Housing need describes the number of households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market without financial support (such as through benefits).

Local authorities are required to undertake periodic reviews of the housing needs of their area in accordance with Section 8 of the 1985 Housing Act.



Robust evidence of housing need is therefore a statutory requirement needed to underpin policies seeking affordable housing through new development.

The study uses the 'Basic Needs Assessment Model' as recommended in government guidance for undertaking Strategic Housing Market Assessments (CLG, 2007). It is a prescribed approach which focuses on the need for and supply of affordable housing to identify a shortfall or surplus of provision.

Assuming that households spend no more than 25% of their gross income on housing costs and all housing need were to be met through the provision of affordable housing, the analysis indicates that 17,400 affordable homes would be needed over the 2012 – 2017 period in addition to that which already has planning consent. High housing costs in Brighton & Hove suggest that many households are likely to spend more than 25% of their gross income on housing costs. A further analysis, using an assumption of 35% spent on housing costs indicates that 12,550 affordable homes would need to be provided over the 2012 – 2017 period. It is not likely that even the lower level of affordable housing can be delivered over the period to 2017.

The Basic Needs Assessment Model considers affordable housing in isolation from other tenures. In reality, many households in the city are able to find housing within the private-rented sector, supported by Local Housing Allowance. In practice, a significant proportion of the net housing need is likely to be met through the private rented sector; either by households spending more than 25% or 35% of their gross income on rent or by having income supplemented by Local Housing Allowance. However, it is recognised that reforms to Local Housing Allowance may restrict the potential for households in housing need to be accommodated in the private rented sector.

The very high level of housing need in the city provides a strong justification for the provision of affordable housing in new development.

## **7. Site Capacity Assessments (December 2012)**

The draft City Plan Part 1 identifies a number of strategic and employment allocations that are essential to the delivery of the long term development objectives in the City Plan. These allocations set out the types of uses and amount of development expected on each site. In response to comments raised during consultation on the draft City Plan and to ensure the City Plan is robust and that the quantities identified in the City Plan are deliverable, the capacity of seven sites identified in the Plan were assessed.

The council has produced a Viability Study 2012 as a background document which informed a number of changes to the Development Area Policies. The Site Capacity Assessment for the Development Areas follows up on the work undertaken by the Viability Study to understand the capacity of each of the sites where particular quantities of development are identified. The links between the Capacity Assessment and the Viability Study have enabled a complete understanding of the deliverability of each of the allocations to ensure a robust and sound City Plan.



## Appendix 6 - How the City Plan helps deliver against the principles under the One Planet Living approach

**DA refers to Development Area Policies**

**SA refers to Special Area Policies**

**CP refers to citywide policies**

OPL Principle	City Plan Policy	How?
<b>Zero Carbon</b>  Enabling access to energy, making buildings more energy efficient and delivering all energy with renewable technologies.	<b>Spatial Strategy; DA1-8 All Development Area policies</b>  <b>SA1 Seafront</b>  <b>CP1 Housing Delivery</b>  <b>CP2 Sustainable Economic Development</b>  <b>CP3 Employment Land</b>  <b>CP7 Infrastructure, CIL and</b>	DAs are located in sustainable locations and include major site allocations required to meet high standards of sustainability.  Opportunities within certain DAs for district heating references will be included following recommendations of Energy Study  Major site allocation (King Alfred/RNR site) would need to comply with CP8 and seafront policy also talks of considering options for small scale renewable energy provision.  Ensure the efficient use of land/sites including higher densities in appropriate locations  Supports proposals that drive city's transition to low carbon economy and identifies environmental technologies as key employment sector. Support provision and delivery of ICT infrastructure, ultra-fast broadband and supports apprenticeship, training and job opportunities – Local Employment Scheme  Safeguarding identified employment sites to meet needs of city, encourages refurbishment and upgrade of existing estates to be more resource efficient.  Sustainable development, efficiency measures including renewable energy,

	<p><b>developer contributions</b></p> <p><b>CP8 Sustainable Buildings</b></p> <p><b>CP9 Sustainable Transport</b></p> <p><b>CP12 Urban Design</b></p>	<p>reducing carbon footprint and air quality measures included in the range of infrastructure and service provision that may be supported by CIL or contributions</p> <p>All development is expected to avoid expansion of city's ecological footprint, delivering radical reductions in greenhouse gas emissions and zero carbon development. There is a combined approach requiring high on site standards via use of Code for Sustainable Homes and BREEAM plus mitigation measures implementing a 'carbon offset' approach. The challenging BREEAM and Code standards adopted in CP8 will drive use of renewable energy installations in all new development.</p> <p>Sustainable transport is key principle in city's One Planet approach to sustainability, by informing and influencing journey patterns and promoting and encouraging more sustainable transport options and measures that increase people's travel options help tackle climate change and reduce carbon emissions. Promote alternative fuels and electric charging points.</p> <p>Part 3 achieve excellence in sustainable building design and construction</p>
<p><b>Zero Waste</b></p> <p>Reducing waste, reusing where possible, creating products &amp; employment through recycling and ultimately sending zero waste to landfill</p>	<p><b>CP8 Sustainable Building</b></p> <p><b>CP15 Heritage</b></p> <p><b>Waste and Minerals Plan</b></p>	<p>All development must demonstrate how waste has been addressed, e.g.: re-use of existing buildings; minimisation of waste and facilitation of recycling, composting and re-use. All Code and BREEAM assessments deliver enhanced performance in waste management; plus use of materials that incorporate re-used and recycled materials.</p> <p>Keeping heritage assets in use is inherently sustainable as it avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings.</p> <p>The Waste &amp; Minerals Plan aims to drive the management of waste up the waste hierarchy by reusing and recycling waste material into new products and recovering energy from materials that cannot effectively be recycled. The network of waste recycling and recovery facilities provided through the contract</p>

		<p>with Veolia means the level of diversion of household waste from landfill is now close to 100% and ambitious targets are included to recycle 70% and recover 95% of commercial and industrial waste by 2015/16.</p> <p><b>SPD3 Construction and Demolition Waste guidance</b></p>
<p><b>Sustainable Transport</b> Encouraging low carbon modes of transport to reduce emissions, reducing the need to travel</p>	<p><b>Supplementary Planning Document</b></p> <p><b>Spatial Strategy</b></p> <p><b>DA1-8</b> <b>SA1-6</b></p> <p><b>SA6 Sustainable Neighbourhoods</b></p> <p><b>CP4 Retail Provision</b></p> <p><b>CP7 Infrastructure, CIL and developer contributions</b></p> <p><b>CP9 Sustainable Transport</b></p>	<p>The spatial strategy is to locate development in accessible locations or to improve access to development areas</p> <p>Sustainable transport priorities to promote a modal shift and encourage active travel and improved public places set out within development area and special area policies</p> <p>Priority 5 is to improve sustainable transport access to and from areas in outer locations through partnership working. Improve cycling and walking links</p> <p>Ensure Brighton &amp; Hove's shopping centres and local neighbourhood shopping facilities remain vibrant, attractive and accessible. Balanced local network of local centres facilitate access to food produce and key services on foot/ public transport.</p> <p>Sustainable transport measures included in the range of infrastructure and service provision that may be supported by CIL or contributions</p> <p>Sustainable transport is key principle in city's One Planet approach to sustainability, by informing and influencing journey patterns and promoting and encouraging more sustainable transport options and measures that increase people's travel options help tackle climate change and reduce carbon emissions. Promote alternative fuels and electric charging points.</p>
<p><b>Sustainable Materials</b> Using sustainable products that have</p>	<p><b>SA6 Sustainable Neighbourhoods</b></p> <p><b>CP5 Culture and Tourism</b></p>	<p>Promote and support environmental sustainability improvements to new and existing buildings.</p> <p>New visitor attractions, arts and festival events will be expected to be of high environmental standard in terms of design, management and access.</p>

<p>a low embodied energy</p>	<p><b>CP7 Infrastructure and developer contributions</b></p> <p><b>CP8 Sustainable Building</b></p> <p><b>CP15 Heritage</b></p> <p><b>Waste and Minerals Plan</b></p>	<p>Sustainable development, efficiency measures including renewable energy, reducing carbon footprint and air quality measures included in the range of infrastructure and service provision that may be supported by CIL or contributions</p> <p>CP8 requires demonstration of how the following have been incorporated into development: materials with recycled content; recyclable materials; sustainably sourced; produced locally; procured sustainably and ethically; avoiding materials which are polluting or with high embodied carbon and energy inputs.</p> <p>Keeping heritage assets in use is inherently sustainable as it avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings.</p> <p>An objective of the Waste &amp; Minerals Plan is to ensure that sustainable waste management objectives are considered in all plans, strategies and proposals in the Plan Area, and that the design, construction and operation of all new development promotes sustainable waste management.</p>
<p><b>Local and Sustainable Food</b> Choosing low impact, local. seasonal and organic diets and reducing food waste</p>	<p><b>DA7 Toads Hole Valley</b></p> <p><b>SA4 Urban Fringe</b></p> <p><b>SA5 South Downs</b></p> <p><b>SA6 Sustainable Neighbourhoods</b></p> <p><b>CP4 Retail Provision</b></p>	<p>As part of the scheme, a minimum of 0.5 ha should be set aside for food growing for local residents.</p> <p>Encouraging multifunctional uses such as new allotments and local food production.</p> <p>Promote sustainable land use management systems, greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives.</p> <p>Promote local food growing.</p> <p>Ensure Brighton &amp; Hove's shopping centres and local neighbourhood shopping</p>

	<p><b>CP8 Sustainable Building</b></p> <p><b>CP16 Open Space</b></p> <p><b>CP18 Healthy City</b></p> <p><b>Food Growing Planning Advice Note</b></p>	<p>facilities remain vibrant, attractive and accessible. Balanced local network of local centres facilitate access to food produce and key services on foot/ public transport.</p> <p>All development proposals are expected to demonstrate how food growing has been encouraged as part of the scheme.</p> <p>Safeguard, improve and promote access to open space. All new development to contribute to the provision of and improve the quality, quantity, variety and accessibility of public open space in accordance with the open space standards which include a standard for allotments. On-site food growing initiatives required with new development.</p> <p>Recognise, safeguard and encourage role of allotments, garden plots within development, small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options.</p> <p>Provides technical guidance and examples of best practice in delivering food growing as part of development schemes including examples such as fruit trees, allotments, edible landscaping or suitable individual areas in small spaces such as balconies or walls.</p>
<p><b>Sustainable Water</b></p> <p>Using water more efficiently in buildings and in the products we buy; tackling local flooding and water course pollution</p>	<p><b>DA7 Toads Hole Valley</b></p> <p><b>SA1 The Seafront</b></p> <p><b>SA4 Urban Fringe</b></p> <p><b>SA5 South Downs</b></p> <p><b>CP8 Sustainable Building</b></p>	<p>Priority to protect the aquifer from contamination.</p> <p>Maintain coastal defences and ensure appropriate waste water treatment infrastructure.</p> <p>Protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface runoff and soil erosion.</p> <p>Protect sensitive aquifer protection zones and address catchment flood management issues.</p> <p>All development should aspires towards water neutrality by meeting high water</p>

		<p>efficiency standards and incorporate facilities to recycle, harvest and conserve water resources, reduce water pollution.</p> <p><b>CP11 Flood Risk</b></p> <p>Manage and reduce flood risk including surface water flood risk taking account effects of climate change on the city.</p>
<p><b>Land use and Wildlife</b></p> <p>Protecting and expanding old habitats and creating new space for wildlife</p>	<p><b>DA1-DA6</b></p> <p><b>SA1 The Seafront</b></p> <p><b>SA3 Valley Gardens</b></p> <p><b>SA4 Urban Fringe</b></p>	<p>Future development in these areas will need to accord with SA6 CP10, CP13, CP14 and CP16. Specific reference is given to : providing biodiversity improvements/enhancements in DA1/DA2/DA3/DA4/DA5/DA7; provision of environmental and open space improvements and features which support Biosphere objectives in DA6; protection and enhancement of the geodiversity and ecological environment at the Marina and improving links to open space/green network in DA2; protection and enhancement of the vegetated shingle area which falls within the SNCI<sup>1</sup> designated at Black Rock beach in DA2; the delivery of inter-connected green infrastructure in DA3; development should contribute towards Biodiversity Action Plan objectives within the Preston Barracks, Woollards Field and Falmer released land strategic allocations in DA3; ensuring development in Toads Hole Valley is exemplary, achieves One Planet Living principles, promotes Biosphere Reserve objectives and conserves and enhances the designated SNCI in DA7.</p> <p>Proposals are expected to ensure a good marine environment and enhance biodiversity in accordance with Biosphere objectives. An identified priority is to monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment.</p> <p>One of the seven overall aims detailed for Valley Gardens is enhancing the biodiversity of the area.</p> <p>Promotion of the urban fringe and encourage opportunities for biodiversity conservation and enhancement.</p>

<sup>1</sup> SNCI is an acronym for Site of Nature Conservation Importance



	<b>SA5 South Downs</b>	Regard given to Biodiversity Action Plan targets and National Park purposes which includes conserve and enhance the natural beauty, wildlife and cultural heritage of the park. Promotion of Biosphere Reserve principles and objectives.
	<b>SA6 Sustainable Neighbourhoods</b>	Support improvements to the public realm, biodiversity and open space in areas identified with significant environmental, community safety and access concerns.
	<b>CP8 Sustainable Building</b>	All development must demonstrate how it delivers enhanced biodiversity. BREEAM and Code assessments deliver audited basic to high standards in ecological protection and enhancement. Development is also expected to reduce 'heat island effect' and surface water run-off which can be delivered through green landscaping, green roofs and green walls: this will be elaborated in supplementary guidance such as the update of SPD08.
	<b>CP10 Biodiversity</b>	Conserve, restore and enhance biodiversity and promote improved access to it. Contribute to the delivery of the biodiversity improvements within the South Downs Way Ahead Nature Improvement Area (NIA). Ensuring development: conserves biodiversity, delivers measurable biodiversity improvements, provides net gains for biodiversity wherever possible and contributes positively to ecosystem services. Taking account of local Biosphere objectives.
	<b>CP13 Public Street and Spaces</b>	In appropriate cases new development is expected to contribute to the incorporation of street trees and biodiversity within public streets and spaces.
	<b>CP14 Housing Density</b>	Housing development is to provide outdoor recreation space appropriate to the demand it generates and contribute towards the 'green network' where an identified gap exists. It is also to maintain or create a coherent townscape and contribute positively to a sense of place.
	<b>CP16 Open Space</b>	Safeguard, improve, expand and promote access to public and private open space. All new development to contribute to the provision of and improve the quality, quantity, variety and accessibility of public open space in accordance with the open space standards

<b>Culture and Community</b> Reviving local identity and wisdom; support for, and participation in the arts	<b>All DAs</b>	Each DA identifies local priorities for providing community facilities, public art, improved public realm, biodiversity and public art.
	<b>SA1 Seafront</b>	Support a year round cultural role for the seafront by enhancing the public realm and making it more accessible. Includes a priority to improve the lower promenade and create tranquil areas. East of the Palace pier promote family space and public art.
	<b>SA2 Central Brighton</b>	Identified as Brighton's cultural quarter and support for this role
	<b>SA6 Sustainable Neighbourhoods</b>	Priorities 3 and 4 support involvement in neighbourhood governance and planning. 7 aims to tackle shortfall in community facilities and 9 supports cultural initiatives and other activities that help with community cohesion.
	<b>CP5 Culture and Tourism</b>	<p>Ensure that all new housing developments contribute to the creation and/or maintenance of sustainable communities.</p> <p>Maintain and enhance cultural offer of the city, affordable and appropriate arts and creative industries workspace, support investment in spaces suitable for outdoor events, temporary use of vacant commercial buildings for creative industries, arts and cultural sector. Promotes Eco-tourism.</p>
	<b>CP7 Infrastructure and Developer Contributions</b>	Education and learning including schools and libraries;; employment and regeneration initiatives including LES, Tourism, culture and heritage, public art, public realm and environmental improvements included in the range of infrastructure and service provision that may be supported by CIL or contributions.
	<b>CP12 Urban Design</b>	All new development would be expected to establish a strong sense of place, respecting the diverse character and urban grain of city's neighbourhood. Inclusive and adaptable design.
	<b>CP13 Public Streets and Spaces</b>	Enhancing local distinctiveness, attractive and adaptable spaces that enrich people's quality of life, provide for needs of all users, incorporate public art.

	<b>CP15 Heritage</b>	Ensure historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city.
<b>Equity and Local Community</b> Inclusive, empowering workplaces with equitable pay; support for local communities and fair trade	<b>All DAs</b>	Outline proposals for regeneration of the city.
	<b>SA6 Sustainable Communities</b>	Create and maintain sustainable neighbourhoods and reduce inequalities between neighbourhoods through good quality employment opportunities and training opportunities. Support the preparation Neighbourhood Plan
	<b>CP2 Sustainable Economic Development</b>	Promote and secure inward investment opportunities, retain existing businesses and support indigenous business growth and diversification of city economy to ensure its resilience and versatility. Supports proposals that drive city's transition to low carbon economy and identifies and support city's key employment sector. Support provision and delivery of ICT infrastructure, ultra-fast broadband and supports apprenticeship, training and job opportunities – Local Employment Scheme.
	<b>CP3 Employment Land</b>	Safeguards employment sites to meet city's needs.
	<b>CP4 Retail Provision</b>	Ensure Brighton & hove's shopping centres and local neighbourhood shopping facilities remain vibrant, attractive and accessible.
	<b>CP7 Infrastructure and Developer Contributions</b>	Employment, regeneration and initiatives including securing local employment and training included in the range of infrastructure and service provision that may be supported by CIL or contributions
<b>Health and Happiness</b> Encouraging active, sociable, meaningful lives to promote good health and well	<b>SA6 Sustainable Neighbourhoods</b>	Create and maintain sustainable communities and reduce inequalities between neighbourhoods through partnership working to meet priorities including improved facilities, better access, safer streets, local shopping parades and promote local decision making.
	<b>CP1 Housing Delivery</b>	Ensuring new housing is delivered in the city
	<b>CP8 Sustainable Building</b>	All development must demonstrate how it protects occupant health and the

being		wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation.
	<b>CP12 Urban Design</b>	Ensures developments are inclusive, adaptable, accessible, deters crime and disorder and the fear of crime.
	<b>CP13 Public Streets and Places</b>	Ensures development provide improvements to produce attractive and adaptable streets and public spaces that enrich people's quality of life and provide for the needs of all users/encourages active living and healthier lifestyles/creation of safe and inclusive public spaces.
	<b>CP16 Open Space</b>	Retention, enhancement and expansion of open space sought because it is recognised open space bring about health and well being benefits as well as economic and environmental ones (e.g. physical activity, food growing, green environment can reduce stress etc).
	<b>CP17 Sports Provision</b>	Retention, enhancement and additional indoor and outdoor sport provision sought because it is recognised they bring about health and well being benefits as well as economic and environmental ones (ego physical activity).
	<b>CP18 Healthy City</b>	Seeks to reduce health inequalities and promotes healthier lifestyles. Encourages active living for all ages including healthy living options.
	<b>CP19 Housing Mix</b>	Seeks to improve housing choice by ensuring an appropriate mix of housing (type, size and tenure) because it is recognised good quality housing of the right kind bring about health and well being benefits (e.g. needs of elderly and disabled people met, protection from cold and damp etc).
	<b>CP20 Affordable Housing</b>	An adequate supply of affordable housing in the city is critical to good health.
	<b>CP22 Traveller Accommod</b>	Making provision for permanent and temporary sites for travellers.

**Council**

31 January 2013

**Agenda Item 81**

Brighton &amp; Hove City Council

<b>Subject:</b>	<b>Adoption of the East Sussex, South Downs and Brighton &amp; Hove Waste &amp; Minerals Plan</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 24 January 2013 – Policy & Resources Committee		
<b>Report of:</b>	<b>Strategic Director, Place</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Steve Tremlett</b>	<b>Tel: 29-2108</b>
	<b>Email:</b>	<b>Steve.Tremlett@brighton-hove.gov.uk</b>	
<b>Ward(s) affected:</b>	<b>All</b>		

**FOR GENERAL RELEASE****1. SUMMARY AND POLICY CONTEXT:**

- 1.1 This report is to inform the Policy and Resources Committee and Council of the outcome of the Public Examination of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (WMP), and seek approval for formal adoption of the Plan.
- 1.2 If adopted the WMP will provide planning policy for waste management and minerals production in East Sussex and Brighton & Hove, including that part of the South Downs National Park within East Sussex and Brighton & Hove (the Plan Area) to 2026. It will replace much of the adopted Waste Local Plan and Minerals Local Plan.

**2. RECOMMENDATIONS:**

- 2.1 That the Policy and Resources Committee is asked to recommend to Council to:
  - adopt the WMP, incorporating the Main Modification and minor modifications, as waste and minerals planning policy subject to the Head of Planning and Public Protection agreeing any further minor changes to the text of the Waste and Minerals Plan with East Sussex County Council and the South Downs National Park Authority;
  - note the analysis of the responses to the consultation on the Main Modification to the WMP;
  - note the contents of the Inspector's Report and her conclusion that the WMP is legally compliant and 'sound';
  - note the minor non-material modifications made to the WMP;
  - agree the Main Modification made to the WMP.

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 The WMP will provide the planning policy framework for waste management and minerals production within the Plan Area until 2026. The Plan's approach is to:
- reduce the amount of waste produced;
  - make provision for increased treatment (e.g. recycling or recovery) of waste including additional capacity for recycling/recovery facilities equivalent to the likely exports of waste for landfill;
  - identify 'Areas of Focus' for suitable locations for waste treatment facilities;
  - save the existing site allocations for recycling/recovery facilities contained in the Waste Local Plan until replaced by the subsequent Sites Plan;
  - recognise that the declining amounts of waste still requiring landfill should utilise existing planning permissions outside the Plan Area and therefore not include any Areas of Search for landraise or landfill;
  - safeguard existing landfill capacity;
  - resist the disposal of residual waste from London in the Plan Area;
  - meet the apportionment for aggregates advised by Government.
- 3.2 Following the Council resolution on 26 January 2012, a Proposed Submission Waste and Minerals Plan was published for statutory public consultation for a six week period commencing on 21 February 2012. 35 representations on the soundness of the Plan were received during this period and these were submitted, alongside the Plan, to the Secretary of State for independent Examination on 1 June 2012. Between 18 September and 28 September, Planning Inspector Susan Holland held public hearings at County Hall, Lewes, on aspects of the WMP as part of the Plan's Examination.
- 3.3 As a result of the Government's implementation of the National Planning Policy Framework in March 2012, the Inspector indicated that the Authorities should consider modifying the Plan by inserting a new policy that is intended to confirm that the Plan has a 'presumption in favour of sustainable development'. As the Plan already contained policies which taken together as a whole are intended to result in sustainable development, it was considered this 'Main Modification' did not represent a shift in the policy approach. As such the modification was published for public consultation under delegated authority by the Strategic Director of Place, as agreed at the July 2012 meeting of the Policy & Resources Committee. The consultation took place from Friday 12 October to Friday 9 November 2012. Ten comments were received which were forwarded to the Inspector for consideration. Details are included in Appendix 3.
- 3.4 A schedule of minor modifications made to the WMP for factual updates and clarity which do not materially affect the Plan is set out in Appendix 2.
- 3.5 The Inspector submitted her report to the Authorities on 9 January 2013 and in it she concludes that the modified WMP is 'sound' and legally compliant. In her report the Inspector noted that it is a positively prepared Plan with urgency and force in its commitment to moving away from land disposal (i.e. landfill and landraise) as a means of waste management.

- 3.6 The report concludes that the WMP provides an appropriate basis for the planning of the area over the next 15 years providing that a single main modification is made to the plan, as discussed in paragraph 3.3 above.
- 3.7 A copy of the Inspector's Report is available in the Members' Room. The Report has been published for public inspection and is available to view on the Council's website. In light of the Inspector's conclusions the WMP may now be adopted. The text of the Plan proposed for adoption is included in Appendix 1.
- 3.8 It is proposed that authority should be delegated to the Head of Planning and Public Protection to agree any further necessary minor modifications to be made to the WMP for factual updates and clarity, which do not materially affect the Plan, following consideration by the South Downs National Park Authority and East Sussex County Council. A schedule of the current minor modifications made to the WMP is set out in Appendix 2.
- 3.9 Adoption of the WMP will be considered by East Sussex County Council on 12<sup>th</sup> February 2013 and by the South Downs National Park Authority on 19<sup>th</sup> February 2013. A six week period for legal challenge would then begin. If the three Authorities adopt the WMP it will become part of the statutory Development Plan for Brighton & Hove. That means that it will be used by the City Council as the basis for determining planning applications for waste and minerals related development.
- 3.10 Progression of the WMP to a stage where it has been found sound, legally compliant and able to be adopted is a considerable achievement. Significantly less than half of waste planning authorities in England currently have adopted waste plans under the current system.
- 3.11 Following adoption, formal work will commence on a Waste & Minerals Sites Plan, which will identify specific sites for the waste and minerals development required to achieve the objectives of the WMP.

#### **4. COMMUNITY ENGAGEMENT AND CONSULTATION**

- 4.1 The Waste and Minerals Plan has been a number of years in gestation and has evolved through a number of stages of public consultation, as follows:
- Sustainability Appraisal Scoping (2007);
  - Issues & Options (2008);
  - Preferred Strategy (2009);
  - Draft Waste & Minerals Plan (2011);
  - Proposed Submission Waste and Minerals Plan (February - April 2012).
- 4.2 The consultation on the insertion of the presumption in favour of sustainable development as a Main Modification took place from 12 October to 9 November 2012.

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 5.1 The costs of the consultation on the draft Waste and Minerals Plan and of publishing the Proposed Submission Waste and Minerals Plan are being shared proportionally with East Sussex County Council and the South Downs National Park Authority. The council's share of the costs will be met from within the existing Waste Planning revenue budget.

*Finance Officer Consulted: Karen Brookshaw*

*Date: 28/11/12*

### Legal Implications:

- 5.2 The legislative background to the Waste and Minerals Plan is found in the Planning and Compulsory Purchase Act 2004, section 23 of which sets out the circumstances in which a development plan document may be adopted. Section 23 provides, inter alia, that where modifications have been recommended by the examining inspector, as is the case with the WMP, then should the local planning authority wish to adopt the plan they can only do with the recommended modifications.
- 5.3 As stated in paragraph 3.7 of the report, once adopted the WMP will become part of the City's statutory development plan. As such, and to comply with section 38(6) of the 2004 Act, determinations of waste and minerals planning applications will need to accord with the relevant policies in the WMP unless material planning considerations indicate otherwise.
- 5.4 No adverse human rights implications arise from the report

*Lawyer Consulted:*

*Hilary Woodward*

*Date: 28/11/12*

### Equalities Implications:

- 5.5 None directly arising from this report

### Sustainability Implications:

- 5.6 The planning system has a clear purpose to contribute towards the achievement of sustainable development. The WMP has been subject to a full Sustainability Appraisal of its economic, social and environmental impacts.

### Crime & Disorder Implications:

- 5.7 None specifically arising from this report.

### Risk and Opportunity Management Implications:

- 5.8 Risks to the project were regularly reviewed at project meetings. Adoption of the Waste & Minerals Plan would complete the project.



Public Health Implications:

- 5.9 None arising directly from this report.

Corporate / Citywide Implications:

- 5.10 It is important that the planning policies are in place to provide a strategy for dealing with waste management and minerals production across Brighton & Hove and East Sussex.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 This is the only practicable option if the Waste and Minerals Plan is to be adopted.

**7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 Approval of Council is required to adopt the Waste and Minerals Plan.

**SUPPORTING DOCUMENTATION**

**Appendices:**

1. Waste & Minerals Plan (version for adoption) (165 pages – in Members' Rooms).
2. Schedule of current minor modifications.
3. Submission Waste & Minerals Plan Main Modification Consultation Summary of Responses (33 pages – in Members' Rooms).

**Documents in Members' Rooms**

1. Sustainability Appraisal
2. Inspector's report.



# 1 Minor Modifications

Table of Proposed Minor Modifications

Ref	Part of Submission Plan Changed			Change	Reason for Change
	Page	Para	Other		
M0.1			Throughout Plan	(Note: new inserted wording is shown as highlighted and underlined, deleted wording is struck through.) Update page, table, paragraph numbers and policy numbers as required & correction of any typographical errors in addition to those listed below.	Factual corrections
M0.2			Throughout Plan	Replace all references to 'Waste Sites DPD' and 'Minerals Sites DPD' with 'Waste and Minerals Sites Plan'	Update to reflect revised Minerals and Waste Development Scheme that was brought into effect in September 2012
M0.3			Throughout Plan	Replace all references to 'Municipal Solid Waste' or 'MSW' to 'Local Authority Collected Waste' or 'LACW'	Updated and delete old terminology
M0.4	4		Paragraph 1 (unnumbered)	Once adopted <del>the</del> This Plan will form part of the 'Development Plan' covering East Sussex, part of the South Downs and Brighton & Hove. The Plan will constitute the Authorities' 'Waste and Minerals Core Strategy'.	Updated and delete old terminology
M0.5	4		Paragraph 2 (unnumbered)	Existing This Plan replaces the majority of waste and minerals planning policy is contained in the adopted East Sussex and Brighton & Hove Waste Local Plan (2006), and Minerals Local Plan (1999). The policies from both have been 'saved' which means they will remain in force until replaced by policies in the total new development plan document. You can see the list of which policies have been will be replaced by in each document in Section 9.	Update for final adoption
M0.6	4		Paragraph 3 (unnumbered)	The total new development plan document (known as the Waste and Minerals Local Plan) will be made up of: <ul style="list-style-type: none"> <li>• The Plan (this document); and</li> <li>• A waste and minerals sites document; and</li> <li>• A minerals sites document.</li> </ul>	Update to reflect fact that a single waste and minerals sites document is to be produced

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change																
			The sites documents will use the policies set out in the <b>this</b> Plan to identify the most suitable areas for waste and minerals development.																	
M0.7	5	Paragraph 4 (unnumbered)	The table below provides the dates of previous consultations and summarises the current timetable for future <b>key</b> stages of the Plan's preparation. <b>Preparation of t</b> he sites documents <b>will take place in accordance with the timetables in Authorities' Development Schemes</b> . <b>be prepared once the Plan has been adopted:</b>	Updated to reflect current stage																
M0.8	5	Table entitled 'Key dates for the Waste & Minerals Plan'	<table><tr><th>Stage</th><th>Date</th></tr><tr><td>Preferred Strategy consultation</td><td>21 October 2009 to 25 January 2010</td></tr><tr><td>Draft Plan consultation</td><td>27 October 2011 to 8 December 2011</td></tr><tr><td>Formal ('Regulation 27') consultation on the soundness of the Plan</td><td>24 February to 24 April 2012</td></tr><tr><td>Submission of the Plan to Government</td><td>Summer 2012</td></tr><tr><td>Examination in Public <b>Examination</b></td><td>Autumn 2012</td></tr><tr><td><b>Consultation on Main Modification</b></td><td><b>12 October to 9 November 2012</b></td></tr><tr><td>Adoption</td><td>January 2013</td></tr></table> <b>Key dates for the Waste &amp; Minerals Plan</b>	Stage	Date	Preferred Strategy consultation	21 October 2009 to 25 January 2010	Draft Plan consultation	27 October 2011 to 8 December 2011	Formal ('Regulation 27') consultation on the soundness of the Plan	24 February to 24 April 2012	Submission of the Plan to Government	Summer 2012	Examination in Public <b>Examination</b>	Autumn 2012	<b>Consultation on Main Modification</b>	<b>12 October to 9 November 2012</b>	Adoption	January 2013	Updated to reflect current stage
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<b>Consultation on Main Modification</b>	<b>12 October to 9 November 2012</b>																			
Adoption	January 2013																			
M0.9	5	Paragraph 5 (unnumbered)	This is the authorities' Submission document which has been submitted to Government for public examination. When examining the Plan, an independent planning inspector will consider the comments that were received during the consultation in early Spring 2012 on the Plan's soundness and compliance with legislative requirements. The examination is an independent assessment to ensure that the Plan satisfies the requirements of regulations and legislation, and is 'sound'.	Updated to reflect current stage																

# Minor Modifications 1

Ref	Part of Submission Plan Changed		Change	Reason for Change
			<p>This Plan and associated documentation including the Information Papers listed below is available on the following website: <a href="http://consult.eastsussex.gov.uk">http://consult.eastsussex.gov.uk</a>.</p>	
M0.10	8		Index of Policies	Reflect addition of Policy
M1.1	10	1.1	In preparing the Plan, <del>takes</del> account must be taken of international, national, regional and local policies relevant to waste and minerals. A list of all the plans and policies that <del>were</del> are being considered during the preparation of the Plan is included in the Sustainability Appraisal	Update for final adoption
M1.2	10		Sustainability Appraisal Scoping Report - <a href="#">Submission Waste and Minerals Plan, June 2012</a>	Update
M1.3	10	1.1	Other relevant directives, national and regional policies and strategies are explained in more detail in our background Information Papers and in the Preferred Strategy consultation document (2009) which can be found on the <a href="#">Authorities Councils websites</a>	Update
M1.4	11	1.9	The Plan <del>has</del> must taken into account local policies and strategies. In the Plan Area those of most direct relevance <del>were</del> are:	Update for final adoption
M1.5	11	1.10	The <a href="#">East Sussex and Brighton &amp; Hove Waste Local Plan (2006)</a> provides a relatively up-to-date background to many of the issues that are considered in this Plan, and the Plan must take <del>look</del> account of its content because it <del>is</del> was part of the statutory development plan. It provides the detailed policy framework for waste management including site allocations. The <a href="#">site allocation</a> policies <a href="#">for built waste facilities</a> have been 'saved' until they are replaced by relevant policies in the Waste and Minerals <a href="#">Sites Plan Development Framework (See Section 8)</a> .	Update for final adoption
M1.6	11	1.11	The <a href="#">East Sussex and Brighton &amp; Hove Minerals Local Plan (1999)</a> <del>is</del> was also part of the statutory development plan, <del>and setting</del> out the detailed policy framework for minerals extraction and production including site allocations. <del>The</del> <a href="#">Certain</a> policies have been 'saved' until they are replaced by relevant policies in the Waste and Minerals <a href="#">Sites Development Framework</a> including those in this Plan <a href="#">(See Section 8)</a> .	Update for final adoption
M1.7	11	1.12	The strategies do not consider specific sites for new waste management facilities because that is dealt with through the planning process and the Waste and Minerals <a href="#">Plans Development Framework</a>	Update to reflect new terminology

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M1.8	12	1.13	The contract, which runs until 2033, involves the operation, development, and construction of a network of strategically placed facilities to increase recycling, composting, and recovery and to reduce the amount of municipal <b>local authority collected</b> waste going to landfill.	Update to reflect new terminology
M1.9	12	1.14	The <b>National Park Local Plan</b> Local Development Framework will set out the planning policies for the area.	Update to reflect new title
M1.10	12	1.14	There is also a <b>One Planet Living Framework</b> being prepared for Brighton & Hove. In addition, the <b>Waste and Minerals Plan</b> will also help achieve the local target for 'zero waste' set by Brighton & Hove under the <b>One Planet approach</b> .  Footnote: The One Planet approach defines 'zero waste' as reducing waste, reusing where possible, and ultimately sending zero waste to landfill	Update
M1.11	12	1.15	Local Transport Plans are in place for <b>East Sussex</b> and for <b>Brighton &amp; Hove</b> which both include the areas covered by the National Park, and cover the period <b>2006-2011-2026</b> .	Update
M1.12	12	1.17	The district and borough councils in East Sussex, Brighton & Hove City Council, and the South Downs National Park Authority are preparing their own <b>Local Plans</b> Core Strategies as part of their Local Development Frameworks (LDFs). To date none have reached adoption. Care is being taken to avoid any material conflict between the Waste and Minerals Plan and <b>district and borough local plans</b> LDFs.	Remove old terminology
M1.13	12	1.18	The minerals and waste planning authorities which border the Plan Area are also preparing their own waste and minerals <b>plans</b> development frameworks, which the Plan needs to take into account.	Update to reflect new terminology

# Minor Modifications 1

Ref	Part of Submission Plan Changed		Change	Reason for Change																
M1.14	13	1.21	<del>Municipal Solid Waste (MSW)</del> <b>Local Authority Collected Waste (LACW)</b> is taken in this Plan to mean waste that is collected by local authorities. Generally it is from households (from doorstep collections and Household Waste Recycling Sites), from street cleansing, and from public parks and gardens. <sup>(1)</sup> The current production of over 365,000 tonnes per annum makes up about 21% of all wastes in the Plan Area.	Update to reflect new terminology																
M1.15	14		Table 1 Amend MSW line to delete figures showing MSW management prior to commissioning of Newhaven ERF	Update																
M1.16	14		Footnote 4 Figures in brackets represent the situation once the Newhaven ERF is fully operational	Update																
M1.17	15		Table 2 <table><tr><th>Type of activity</th><th>Total Capacity (tonnes per annum)</th></tr><tr><td>Recycling and Composting (excluding bulk metals)</td><td>490,000</td></tr><tr><td>Bulk Metals Recycling (e.g. Scrapyards)</td><td><del>397,000</del><b>441,000</b></td></tr><tr><td>CDEW Recycling</td><td>630,000</td></tr><tr><td>Other Recovery</td><td>210,000</td></tr><tr><td>ERF Residues Treatment</td><td>0</td></tr><tr><td>Total Hazardous Treatment</td><td>61,000</td></tr><tr><td>Non-hazardous Landfill</td><td><del>344,000</del><b>150,000</b> (total void space in cubic metres)<sup>(11)</sup></td></tr></table>	Type of activity	Total Capacity (tonnes per annum)	Recycling and Composting (excluding bulk metals)	490,000	Bulk Metals Recycling (e.g. Scrapyards)	<del>397,000</del> <b>441,000</b>	CDEW Recycling	630,000	Other Recovery	210,000	ERF Residues Treatment	0	Total Hazardous Treatment	61,000	Non-hazardous Landfill	<del>344,000</del> <b>150,000</b> (total void space in cubic metres) <sup>(11)</sup>	Factual update
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- 1 Due to the wider EU Waste Framework Directive definition of MSW, a new definition has been brought into use in England which relates to the waste previously recorded as Municipal Solid Waste and this is 'Local Authority Collected Waste'. However for reasons of comparability and consistency with previous documents the term Municipal Solid Waste will continue to be used in this Plan.
- 2 Utilisation of capacity out of the Plan Area not included
- 3 See Information Paper 1 for further details
- 4 Other Recovery includes Newhaven ERF
- 5 Unused capacity at existing sites included

# 1 Minor Modifications

Ref	Part of Submission Plan Changed			Change	Reason for Change						
				<table><thead><tr><th>Type of activity</th><th>Total Capacity (tonnes per annum)</th></tr></thead><tbody><tr><td>Hazardous Landfill</td><td>0 (cubic metres)</td></tr><tr><td>Inert Landfill</td><td>15,000 (total void space in cubic metres) (not including sites exempt from EA permit)</td></tr></tbody></table> <p><b>Table 2 Waste Management Capacity in the Plan area 2010/11</b></p> <p>Footnote 11: Reported in January 2012</p> <p>Updated Bulk Metal line to reflect figures found in CD/23 Table 54, (Page 74)</p>	Type of activity	Total Capacity (tonnes per annum)	Hazardous Landfill	0 (cubic metres)	Inert Landfill	15,000 (total void space in cubic metres) (not including sites exempt from EA permit)	
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M1.18	16		Footnote 12	See Information Paper 2, and <b>Waste and Minerals Monitoring Reports Aggregates Resource Study</b>	Factual Update						
M1.19	18		Between paragraphs 1.36 and 1.37	Insert new paragraph: <b>Scrap metal is exported by sea from a dedicated facility within Newhaven Port</b>	Provide additional contextual information						
M1.20	24	1.60		Approximately 750,000 and 200,000 tonnes of aggregates per annum are imported through Shoreham and Newhaven ports respectively: <b>In 2009 approximately 1.14 million tonnes of aggregates per annum were imported through Shoreham Port (covering Brighton &amp; Hove and West Sussex), and 249,000 tonnes were imported through Newhaven and Rye ports together.</b>	Factual Update						
M2.1	24	2.8		There <b>is</b> will be an	Factual Update						

2 Utilisation of capacity out of the Plan Area not included

3 See Information Paper 1 for further details

4 Other Recovery includes Newhaven ERF

5 Unused capacity at existing sites included



# Minor Modifications 1

Ref	Part of Submission Plan Changed		Change	Reason for Change
M2.2	25	2.10	Previous Governments have always been aware of these 'larger than local' interactions and have agreed National and regional policy to provide a framework which ensures that these 'larger than local' matters are taken into account in local planning policy. The new Localism Act 2011 includes a 'Duty to Cooperate' which is intended to facilitate this process.	Update
M2.3	25		Footnote 14 Para 4.33, PPS12: For a DPD to be sound it must be consistent with national policy and be in general conformity with regional policy. See National Planning Policy Framework, paragraph 182.	Update
M2.4	25	2.12	Regulations provided by the Localism Act 2011 will revoke Regional Spatial Strategies and it is expected that although its is uncertain exactly when these will come into force in 2012.	Factual Update
M2.5	26	After 2.13	LSS The NPPF states that mineral planning authorities should plan for a steady and adequate supply of aggregates by preparing a Local Aggregates Assessment (LAA) based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options including marine dredged, secondary and recycled sources. The advice of the relevant Aggregate Working Party should be taken into account when preparing the LAA.  The Authorities consider that the requirement to produce a Local Aggregates Assessment set out within the NPPF is difficult to achieve in the Plan Area as there are limited sites producing material and therefore a lot of data is covered by confidentiality agreements. Relevant data has been used as evidence in support of the Plan and the majority of this information is summarised in IP2 and set out in the Authorities Monitoring Report.	LAA requirement from NPPF
M2.6	26	2.17	All of the above matters and the Authorities' proposed planning policy approach (as set out elsewhere in this document) are considered below.	Update for final adoption
M2.7	27	2.23	Approach: Minimum targets for MSW recycling are set proposed in the Plan which are considered achievable. In any event the Plan seeks management of waste in ...	Update for final adoption
M2.8	36	2.61	adequately catered for."	Punctuation error
M2.9	37	2.63	This Plan proposes that implements the waste hierarchy is implemented in a number of key ways which are set out below and summarised as follows	Update for final adoption

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M2.10	38	2.63	<p>Bullet point 7:</p> <p>"keeping the requirements for the disposal of waste to a minimum and placing strict constraints on the development of new land disposal capacity (Policies WMP 23b, WMP 68a and WMP 68b)."</p>	Corrected reference
M2.11	38	2.66	<p>The Plan has limited influence in preventing waste being produced as the planning system can only intervene once a planning application has been submitted. However, the amount of waste management capacity that needs to be planned for will be <b>is</b> affected by the success of waste prevention initiatives.</p>	Update for final adoption
M2.12	39	2.69	<p>This Plan <b>proposes more includes</b> challenging targets for recycling and other recovery of waste. <b>Some of these targets are higher than those proposed in the 2009 Preferred Strategy.</b> These targets are considered to be achievable and are based on the following:</p>	Update for final adoption
M2.13	40	2.71	<p>The recycling and recovery targets for CDEW proposed in the Preferred Strategy were based on those in the South East Plan but evidence suggests that our Plan targets could in fact be set higher:</p>	Update for final adoption
M2.14	40	2.74	<p>Add to paragraph 2.74:</p> <p><b>Recovery targets are set out in Tables 3, 4 and 5 below for LACW, C&amp;I waste and CDEW respectively. It is anticipated that these targets will be achieved as a result of a combination of the following factors:</b></p> <ul style="list-style-type: none"> <li>• Government policy and legislation intended to reduce reliance on landfill.</li> <li>• Government incentives intended to divert waste from landfill and increase recovery e.g. landfill tax and incentives related to the production of energy from waste e.g. Renewable Heat Incentive.</li> <li>• The lack of availability of landfill locally and the subsequent need to develop alternatives.</li> <li>• The make-up of waste arisings and their ability to be recovered.</li> </ul>	To provide further information on how recovery targets in the Plan will be achieved
M2.15	41		<p>...waste to be managed cannot be reasonably <b>manages managed</b> by a process...</p>	Grammatical correction

# Minor Modifications 1

Ref	Part of Submission Plan Changed			Change	Reason for Change
M2.16	44		Purpose of policy 2d	It is envisaged that <b>t</b> This policy <b>will can</b> be implemented by all planning authorities in the Plan Area.	Update for final adoption
M2.17	45	2.96		Defra is undertaking a review of the Site Waste Management Plan Regulations and following this and the adoption of the Plan, we will update the SPD, taking account of the outcome of the review to support the reduction of construction waste in the Plan Area.	Update for final adoption
M3.1	53	N/A	Policy WMP4	Applications for additional recovery capacity, above that shown in the table above, would need to demonstrate that the proposal reduced disposal to land requirements <b>of waste arisings in the Plan Area</b> .	Clarification
M3.2	54	3.15		it is proposed to continue to save the allocations for strategic non-land disposal facilities that are identified in the Waste Local Plan <b>will not be replaced</b> . This approach will provide some certainty in the interim period regarding land which could be developed in order that the proposed high waste recycling and recovery targets early on in the Plan period can be achieved.	Update for final adoption
M3.3	54		Overarching strategy for built waste facilities	The proposed overarching strategy for provision of built waste facilities in the Plan Area is as follows:	Update for final adoption
M3.4	55		Box entitled 'Overarching Strategy for Built Waste Facilities'	<p>Bullet point 4:  <b>At this stage not replace</b> Continue to save the following Waste Local Plan policies (and the issues and constraints included on the associated inset plans):</p> <p>Add footnote *:</p> <p><b>Current Waste Local Plan 2006 allocations set out in Policies WLP7 and WLP8 and WLP9 are saved until such time as replaced by an adopted Waste and Minerals Sites Plan. (timetable set out in the Authorities' Development Schemes).</b></p> <p>Add new bullet point:</p>	Clarification. In response to comments by Rother DC.

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M3.5	56	3.21	<p>5. In the subsequent Waste and Minerals Sites Plan, sufficient sites will be identified to meet the capacity gap identified in Policy WMP4. This will be undertaken following adoption of the Plan. It will involve a call for sites and a review of the saved site allocations identified in paragraph 4 above. The assessment of sites will consider constraints and there will be public consultation on the Waste and Minerals Sites Document.</p> <p>The policy needs to take into account the following circumstances where protection might be needed for sites for waste uses</p>	Update for final adoption
M3.6	57	Policy WMP5	<p>c. Sites allocated for waste uses in any extant development plan document except as indicated in section 9*.</p> <p>Add footnote:</p> <p>*Currently saved allocations specified in Policies WLP7, WLP8 and WLP9 from the Waste Local Plan 2006 will continue to be saved pending review and assessment as part of the preparation of Waste and Minerals Sites Plan.</p>	Clarification. In response to comments by Rother DC.
M3.7	56	3.24	such as that which takes place	clarification
M3.8	58	3.27	Consideration of locations within the Areas of Focus also needs to be balanced with ensuring the Plan is deliverable, and as such the Plan needs to consider economic viability which is often influenced by economies of scale.	Update for final adoption
M3.9	59	3.29	<p>The Areas of Focus are those where the greatest sustainability benefits are likely to be achieved regarding new waste development or extensions to operations on existing sites as they are more likely to be close to:</p> <ul style="list-style-type: none"> <li>• waste arisings</li> <li>• better transport network</li> <li>• complementary industries and waste development, for potential co-location benefits (for more detail about co-location see Policy WMP 48 19)</li> <li>• existing facilities where there is scope for physical site expansion extension (for more detail about expansion alterations within the site boundary of existing facilities see Policy WMP 24 22)</li> </ul>	Clarification

# Minor Modifications 1

Ref	Part of Submission Plan Changed			Change	Reason for Change
M3.10	59		New Footnote	The Areas also reflect the road, rail and water transport connections within the Plan Area [New Footnote] <a href="#">See Information Paper 8 - Transportation of Waste and Minerals</a>	Clarification
M3.11	59	3.32		It is considered that there is a range of potential sites that could be deliverable within the Areas of Focus over the Plan period. At this stage no specific sites for strategic waste facilities have been identified <a href="#">in this Plan</a> but the Areas of Focus and the locational criteria are sufficiently precise to enable developers to assess where they would be likely to receive permission if other relevant considerations are satisfied. Specific sites will be identified later in the Waste <a href="#">and Minerals</a> Sites <a href="#">Plan</a> DPB,	Update for final adoption
M3.12	60		Policy WMP 6a	<p><b>Sustainable Locations for Waste Development (excluding land disposal)</b></p> <p>Sites for additional waste recycling and recovery facilities <a href="#">and physical extensions to existing</a>, whether new developments or extensions to operations on existing sites, should be sought within the broad Areas of Focus indicated on the Key Diagram inset plan. The sites identified in the Waste Sites DPD will also conform to the strategy set out here.</p> <p>Proposals should demonstrate how they will balance the need to be located close to waste arisings, moving waste management up the waste hierarchy, and minimising adverse impacts on communities and the environment.</p> <p>Proposals for development will only be considered outside of the Areas of Focus if it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>There are no suitable sites available within the Areas of Focus to meet identified needs, or they are small-scale facilities <a href="#">/ extensions to existing facilities</a> predominantly to meet smaller, more localised needs only <a href="#">(6)</a>; and</li> <li>The development will contribute to moving waste management up the waste hierarchy and minimising greenhouse gas emissions; and</li> <li>They are well related to the relevant main treatment facilities within the Plan Area.</li> </ol>	Clarification

- 6 Smaller, localised facilities can be essential in helping to provide local solutions for collecting, sorting, bulking, and transferring and treating wastes in complementing the waste treatment provided at more strategic larger-scale facilities.

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M3.13	61	3.39	The policy <del>aims to be</del> <b>is</b> flexible enough to facilitate development to make use of the best sites that may become available during the Plan period.	Update for final adoption
M3.14	61		Waste <del>built</del> <b>waste</b> development at mineral workings or landfill sites may also be acceptable but will usually be restricted to temporary permissions reflecting the lifespan of the minerals operation or landfill site. [New Footnote]  <b>The lifespan of a site may, but does not necessarily, include restoration phases</b>	Grammatical correction
M3.15	62	3.45	This is £2.00 for inert waste and currently <del>£5664</del> <b>£5664.00</b> for non-inert waste.	Factual correction
M3.16	64	3.48	Therefore no Areas of Search <del>are will be</del> put forward in the Plan.	Factual correction
M3.17	64	3.51	The additional information has led to a recategorisation of all the initial Areas of Search which indicates that the potential for development of a landraise site in any of the areas is at best limited, with constraints that appear difficult to overcome	Update
M3.18	65	N/A	Funding of the BHLR was confirmed in principle <del>by</del> in March 2012	Grammatical correction
M3.19	66	3.58	Additional sentence be added:  <b>This is limited to the spare capacity permitted under RR/525/CM.</b>	Clarification. In response to comments by Rother DC.
M3.20	67	N/A	and at an appropriate distance beyond the Plan Area  <i>(space inserted between words 'an' and 'appropriate')</i>	Grammatical correction
M3.21	68		Proposals for the deposit of only inert waste on land will be permitted, subject to other policies of the Development Plan for the area, where relevant, where it is demonstrated that the proposal:	Clarification within policy WMP7b that inert waste may be used in engineering operations

# Minor Modifications 1

Ref	Part of Submission Plan Changed		Change	Reason for Change
			<p>a. conforms with Policy WMP 8a (a, c, d, e); and</p> <p>b. <b>is an engineering operation such as that which</b> forms part of a comprehensive scheme for restoration of suitable previously developed land or minerals sites; or</p>	
M3.22	71	3.75	<p>must be managed accordingly, however they <b>will be</b> produced in such small quantities</p>	Factual correction
M3.23	71	WMP 8a	<p><b>Hazardous Waste</b></p> <p>Existing capacity for the management of hazardous waste will be safeguarded, where this capacity makes a local, regional or nationally significant contribution to the management of specific hazardous waste streams.</p> <p>Permission will be granted for proposals for the development of additional hazardous waste management capacity where it can be demonstrated that:</p> <p>a. any proposal for the development of capacity for managing imported hazardous waste will not result in the overall hazardous waste management capacity utilised for imports, exceeding the quantity of hazardous waste exported from the Plan Area; <b>and</b></p> <p>b. subject to any reassessment of the need for certain types of management capacity which has been undertaken and published, or in some other way approved, by the Authorities, the proposal provides additional capacity for the management of hazardous waste in the following ways:</p> <ul style="list-style-type: none"> <li>• Treatment or incineration capacity (including thermal treatment technologies) for healthcare wastes. The need for this additional capacity in future is dependent on the implementation of a planning permission granted for such a facility in Eastbourne</li> <li>• Expansion of existing treatment facilities or the introduction of novel treatment technologies for oil wastes;</li> <li>• Treatment capacity for contaminated soils arising from construction, demolition and excavation where this is delivered via mobile treatment plant which can be moved close to the source of production.</li> </ul>	To overcome representor concerns of WMP8a being too restrictive.
M3.24	73	3.85	<p>The issues associated with the management of LLW are different from those presented by other waste streams and so it <b>is necessary</b> <del>has been decided to give</del> <b>consider</b> this matter <b>specific attention</b> <del>in a way which is more detailed than considered at previous stages of this Plan's preparation.</del></p>	Update
M3.25	75	3.93	<p>The key issues identified so far</p>	Clarification



# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M3.26	76	3.94	This is particularly true in the <b>Eastbourne and Hailsham catchment</b> .	Clarification
M3.27	76	3.96	Some of <del>this</del> the additional need <b>for waste water treatment</b>	Clarification
M4.1	80	4.18	Landings <b>directly</b> reflect demand	Additional clarification
M4.2	80		<p><b>Provision of Aggregates</b></p> <p>The Authorities will maintain provision for the production of land won aggregates at a rate of 0.10mtpa throughout the Plan period. <sup>10</sup></p> <p>The Mineral Planning Authorities will maintain a landbank of at least 7 years of planning permission for the extraction of sand and gravel.</p> <p>Footnote 1: <b>If it appears that the provision for the production of land-won aggregates was not being maintained, a specific review of Policy WMP11 will be carried out. This would cover the possibility of identifying further feasible reserves. If this is not possible the the Authorities will consider other options with adjoining Minerals Planning Authorities and the Marine Management Organisation.</b></p>	Footnote added to clarify situation that would trigger a review of WMP10, as set out in footnote 3 of Table 11 and paragraph 4.20.
M4.3	84		<p>...</p> <p>Proposals for extensions to clay workings will be supported, subject to other policies of the plan, where it can be shown that the levels of permitted reserve at that site is insufficient to maintain brick and tile production for <del>up to</del> <b>at least 25</b> years.</p> <p>...</p>	Factual correction to reflect National Policy (NPPF)
M4.4	85	4.36	...However, it is also important to find a balance between protecting mineral reserves- <b>resources</b> for the future and allowing for necessary development of some of those areas.	Factual correction
M4.5	85	4.38	<del>There is no need to safeguard sites that already have planning permission, but they are identified where their continued operation is key to the Plan. As such, the permitted sites in the Plan Area are intended to be identified as Mineral Consultation Areas in the Mineral Sites DPD.</del>	Conflict with proposed changed wording of WMP 13



# Minor Modifications 1

Ref	Part of Submission Plan Changed			Change	Reason for Change
				<p>Replace with:</p> <p>Minerals Consultation Areas need to be identified where the District and Borough Councils will notify the Authorities of any alternative development proposals. The Mineral Safeguarding Areas and Mineral Consultation Areas will be set out in the Waste and Minerals Sites Plan and be informed by the available information on geological resource and the current permitted sites within the Plan Area.</p>	
M4.6	87		WMP13	<p>The Authorities will safeguard areas for land-won resource to ensure viable resources are not sterilised. As mineral resources in the Plan Area are particularly constrained, the Authorities will identify Mineral Safeguarding Areas and Mineral Consultation Areas in the Mineral Sites-DPP Waste and Minerals Sites Plan, and expect to be consulted on any proposal for major development that would have a significant impact on current or future operations.</p> <p>In addition, other non-strategic mineral resources that might need protection will be identified through the Plan review process and in the Mineral Sites-DPP Waste and Minerals Sites Plan. This will allow a viability assessment to be made around additional resource need over the plan period.</p>	Clarification on timing and designation of Mineral Safeguarding Areas and Mineral Consultation Areas stated within the background text.
M4.7	89	N/A	Policy WMP14	<p>Existing, planned and potential railhead and minerals wharf facilities (including rail sidings) and their consequential capacity will be safeguarded in order to contribute towards meeting local and regional supply for aggregates and other minerals as well as supporting modal shift in the transport of minerals. The need for railheads and minerals wharves will be monitored.</p> <p>Capacity for landing, processing and handling and associated storage of minerals at wharves in Shoreham, Newhaven and Rye Ports will be safeguarded. Alternative use proposals would need to demonstrate that there is no net loss of capacity for handling minerals within a port.</p>	Clarification made in response to comments made by Days Aggregates and the requirements of the NPPF

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M4.8	90	4.52	There is no detailed planning policy governing on-shore oil and gas reserves, although Government policy for Energy Infrastructure is set out in a series of National Policy Statements published in 2011. The 14th round of licensing will begin following the completion of the Strategic Environmental Assessment, has been carried out on the licensing regime in 2010	To clarify Government policy
M4.9	90	4.57	Shale gas exploration has started in other areas of the UK, although the initial results of this will be confidential until 2014	Clarification
M4.10	91	4.61	Each phase of development (Exploration,	correction
M5.1	93	5.5	Therefore, the Plan needs to consider a system of review to be initiated for inactive or dormant sites	Update for final adoption
M5.2	93		Policy WMP16 ...Restoration, after-use and aftercare arrangements should maximise the potential benefits, enhancements and opportunities, particularly for agriculture, landscape and biodiversity.	Clarification made in response to comments made by Dudmans (DK Symes) and requirements of the NPPF
M5.3	95	5.8	the Plan will seek to minimise its environmental and amenity impacts	Update for final adoption
M5.4	100	5.25	5.25 The suggested thresholds for development where this policy would apply are taken from the thresholds for major development set out in Regulation (76) and the definition within form PS2 for reporting performance of planning authorities to Government.  Footnote 76: 2006 No. 1062 The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006 Statutory Instruments 2010 No. 2184 The Town and Country Planning (Development Management Procedure) Order 2010 (as amended)	Factual correction and update
M5.5	100	5.26	5.26 Larger-scale major development is currently defined in Regulation by government as including: <ul style="list-style-type: none"> <li>the development of 10 or more dwellings or sites of more than 0.5 ha if the number is not given;</li> <li>for all other uses, where the floor space will be 1,000 square metres or more or the site is 1ha or more.</li> </ul>	Factual correction and update
M5.6	102		Expansion and Alterations within the Site Boundary of Existing to Waste Facilities (WMP2422)	Clarification

# Minor Modifications 1

Ref	Part of Submission Plan Changed		Change	Reason for Change
M5.7	102	Policy WMP 21	<p><b>Expansions and Alterations Increased Operational Capacity within the Site Boundary of Existing Waste Facilities</b></p> <p>Proposals for <b>increased operational capacity</b> expansions or alterations within the site boundary of existing waste management facilities will be supported in principle where it is demonstrated that:</p>	Clarification
M6.1	105	N/A	All buildings associated with waste and minerals developments should be of a scale, form and character appropriate to its location and incorporate innovative design, where appropriate, and allow sufficient space for the effective sorting, recycling, and recovery and storage of waste.	Clarification
M6.2	107	Purpose of Policy WMP24	It supplements the guidance about climate change set out in <b>the National Planning Policy Framework</b> national policy (PP54)	Update
M6.3	107	Footnote 78	<b>Planning Policy Statement: Planning and Climate Change (2007) National Planning Policy Framework, Section 10</b>	Update
M6.4	108	Policy WMP23b	a. energy (including heat) will be obtained from <b>decentralised</b> renewable <b>or low carbon</b> sources where possible (although on-site generation of energy should not prejudice the movement of waste up the waste hierarchy); and	To ensure consistency with the NPPF (para 97)
M6.5	109	Footnote 80	It is expected that such guidance will be published later in 2012 <sup>3</sup> .	Update
M6.6	114	Footnote 81	( <b>Volume 11</b> , Section 3, Part 1)	Typographical error
M6.7	116	6.33	<p>Revision to first sentence of paragraph 6.33 as follows:</p> <p>The strategy for locating waste management developments has been informed by <b>Environment Agency Flood Risk Areas</b> the Strategic Flood Risk Assessment and relevant national policy, as set out in Policy WMP 6 (Sustainable Locations for Waste Development).</p>	Correction

<sup>3</sup> Policy WMP 22 does not relate to extension to the physical boundaries of existing sites (site extensions). Such proposals will be assessed under Policy WMP 7a (Sustainable Locations for Waste Development). The use of the word in policy WMP 22 relates to, for example, increasing the amount of waste managed at a site without extending the site boundary.

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change										
M6.8	117	N/A	Policy WMP27b  To protect the quality and quantity of water resources in the natural environment of the Plan Area, including groundwater abstraction areas within the chalk of the South Downs, the Authorities will not grant permission for proposals which: a. cause unacceptable risk to the quality and quantity of surface and groundwater (including reservoirs); b. cause changes to groundwater and surface water levels which would result in unacceptable adverse impacts on...	Clarification made in response to comment by Ticehurst Parish Council and to reflect paragraph 99 of the NPPE.										
M7.1	119	Implementation and Monitoring Table	Insert new row 1. Text: <table border="1"> <thead> <tr> <th>Policy</th><th>Delivery Body/ Mechanism</th><th>Key Delivery Partners</th><th>Delivery Target (how much, when, where)</th><th>Delivery Indicator</th></tr> </thead> <tbody> <tr> <td>WMP1 - Presumption in favour of sustainable development</td><td>ESCC, BHCC, SDNPA</td><td>Applicants Statutory consultees</td><td>Maintain existing or improve performance of policies listed below (where possible).</td><td>Monitored through the overall performance of the indicators listed below.</td></tr> </tbody> </table> <b>Table 3</b>	Policy	Delivery Body/ Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator	WMP1 - Presumption in favour of sustainable development	ESCC, BHCC, SDNPA	Applicants Statutory consultees	Maintain existing or improve performance of policies listed below (where possible).	Monitored through the overall performance of the indicators listed below.	Reflect addition of Policy
Policy	Delivery Body/ Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator										
WMP1 - Presumption in favour of sustainable development	ESCC, BHCC, SDNPA	Applicants Statutory consultees	Maintain existing or improve performance of policies listed below (where possible).	Monitored through the overall performance of the indicators listed below.										
M7.2	120	Implementation and Monitoring Table  Row WMP 2b  Column: Delivery Target	100% development proposals to contribute to movement up the waste hierarchy for waste arising, and waste being managed, within the Plan Area.  Meet or exceed the recycling and recovery targets for MSW, C&I, and CDEW waste identified in policy WMP 2b, resulting in increased percentages of waste being recycled, and generally diverted away from land disposal.  <b>The targets set out in WMP 2b are:</b>	Clarification										

# Minor Modifications 1

Ref	Part of Submission Plan Changed	Change	Reason for Change															
		<table><tr><th>Year</th><th>Recycling</th><th>Overall Recovery<sup>(3)</sup></th></tr><tr><td><sup>(1)</sup></td><td></td><td></td></tr><tr><td>2015/16</td><td>45%</td><td>98%</td></tr><tr><td>2020/21</td><td>50%</td><td>98%</td></tr><tr><td>2025/26</td><td>55%</td><td>98%</td></tr></table> <p><b>LACW Targets</b></p> <p>1: Targets shall apply to the average achieved during the target year:</p> <p>2: Recycling includes composting:</p> <p>3: Overall recovery target is the total percentage of waste diverted away from land disposal and included re-use, recycling and composting.</p>	Year	Recycling	Overall Recovery <sup>(3)</sup>	<sup>(1)</sup>			2015/16	45%	98%	2020/21	50%	98%	2025/26	55%	98%	
Year	Recycling	Overall Recovery <sup>(3)</sup>																
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		<table><tr><th>Year</th><th>Recycling</th><th>Overall Recovery</th></tr><tr><td>2015/16</td><td>70%</td><td>95%</td></tr><tr><td>2020/21</td><td>70%</td><td>98%</td></tr><tr><td>2025/26</td><td>70%</td><td>98%</td></tr></table> <p><b>C&amp;I Targets</b></p>	Year	Recycling	Overall Recovery	2015/16	70%	95%	2020/21	70%	98%	2025/26	70%	98%				
Year	Recycling	Overall Recovery																
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# 1 Minor Modifications

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Year	Recycling	Overall Recovery																						
2015/16	50%	98%																						
2020/21	50%	98%																						
2025/26	50%	98%																						
M7.3	122  Implementation and Monitoring Table  Row WMP 4  Column: Delivery Target	<p>Provide sufficient capacity for recycling and recovery to support movement up the waste hierarchy. Targets for these are set out in Policy WMP4 as set out below:</p> <table><tr><th>Year</th><th>Min</th><th>Max</th></tr><tr><td>2015/16</td><td>0</td><td>80,000</td></tr><tr><td>2020/21</td><td>0</td><td>120,000</td></tr><tr><td>2025/26</td><td>30,000</td><td>170,000</td></tr></table> <p><b>Recycling<sup>(1)</sup> and Composting Capacity Targets (tonnes per annum)</b></p> <p>1: Recycling capacity does not include transfer capacity where unsorted materials are simply bulked up or capacity for recycling of bulk metals</p> <table><tr><th>Year</th><th>Min</th><th>Max</th></tr><tr><td>2015/16</td><td>60,000</td><td>200,000</td></tr><tr><td>2020/21</td><td>80,000</td><td>220,000</td></tr></table>	Year	Min	Max	2015/16	0	80,000	2020/21	0	120,000	2025/26	30,000	170,000	Year	Min	Max	2015/16	60,000	200,000	2020/21	80,000	220,000	Clarification
Year	Min	Max																						
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# Minor Modifications 1

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				<table><tr><th>Year</th><th>Min</th><th>Max</th></tr><tr><td>2025/26</td><td>60,000</td><td>220,000</td></tr></table> <p><b>Recovery Targets (tonnes per annum)</b></p> <p>Review yearly the indicative permitted capacities for recovery and recycling/composting and publish via the Annual Monitoring Report.</p> <p>Work on a Site Allocations document will commence within 12 months of adoption of the Plan.</p>	Year	Min	Max	2025/26	60,000	220,000	
Year	Min	Max									
2025/26	60,000	220,000									
M9.1	135	9.1		It is proposed that the Waste Local Plan and Minerals Local Plan policies are replaced by the Waste and Minerals Plan as follows:	Update for final adoption						
M10.1	145		Glossary - Core Strategy Entry	<del>Core Strategy</del> – Former name of the Waste & Minerals Plan.	Remove old terminology						
M10.2	145		Glossary - Development Plan Documents Entry	<del>Development Plan Documents (DPDs)</del> - Spatial planning documents that are subject to independent examination. They will have 'development plan' status. A <del>Core Strategy DPD</del> and a <del>Site Allocations DPD</del> are key parts of any <del>Local Development Framework or Waste and Minerals Development Framework</del> .	Remove old terminology						
M10.3	146		Glossary - Local Development Framework Entry	<del>Local Development Framework (LDF)</del> – suite of <del>Development Plan Documents</del> and other items prepared by district councils and unitary authorities, that together form the spatial planning strategy for the local area.	Remove old terminology						
M10.4	146		Glossary - Local Authority Collected Waste	<del>Local Authority Collected Waste (LACW)</del> - formally known as <del>Municipal Solid Waste (MSW)</del> , waste that is collected by a waste collection authority. The majority is household waste, but also includes waste from <del>municipal parks and gardens</del> , <del>beach cleansing</del> , <del>cleared fly-tipped materials</del> and some <del>commercial waste</del> .							
M10.5	147		Glossary - Municipal Solid Waste	<del>Municipal Solid Waste (MSW)</del> – waste that is collected by a waste collection authority. The majority is household waste, but also includes waste from <del>municipal parks and gardens</del> , <del>beach cleansing</del> , <del>cleared fly-tipped materials</del> and some <del>commercial waste</del> .							

# 1 Minor Modifications

Ref	Part of Submission Plan Changed		Change	Reason for Change
M10.6	149	Glossary - Waste and Minerals Development Framework	Waste and Minerals Development Framework (W MDF) - former term used to describe the suite of Development Plan Documents and other items prepared by Waste and Minerals Planning Authorities, that outline the planning strategy for waste and minerals for the local area.	Update for final adoption
M10.7	151	Abbreviations	LACW - Local Authority Collected Waste	Update for final adoption
M10.8	151	Abbreviations	M SW - Municipal Solid Waste	Update for final adoption

Table 1



**Council**

31 January 2013

**Agenda Item 82**

Brighton &amp; Hove City Council

<b>Subject:</b>	<b>Community Safety, Crime Reduction and Drugs Strategy 2011-2014</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 24 January 2013 – Policy & Resources Committee		
<b>Report of:</b>	<b>Tom Scanlon: Director of Public Health</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Linda Beanlands</b>	<b>Tel: 291115</b>
	<b>Email:</b>	<b><a href="mailto:linda.beanlands@brighton-hove.gov.uk">linda.beanlands@brighton-hove.gov.uk</a></b>	
<b>Ward(s) affected:</b>	<b>All</b>		

**FOR GENERAL RELEASE.****1. SUMMARY AND POLICY CONTEXT:**

- 1.1 This report introduces the Community Safety, Crime Reduction and Drugs Strategy for the period 2011 to 2014 (appended). The Strategy is a statutory and city wide plan and sets out the priorities and work programme for delivery by the Community Safety Partnership. The priorities and performance against indicators are reflected within the Corporate Plan for the city.
- 1.2 Following completion of annual strategic assessments of crime and disorder and consultation with local communities and communities of interest, the Strategy is refreshed each year, also taking account of the priorities within the Local Policing Plan, relevant Public Health developments and other relevant developments and plans. The Strategy appended to this report is in its second year of delivery.
- 1.3 An annual strategic assessment of crime and disorder, the views of residents in the city and the priorities, outcomes and detailed work plans within the Strategy will be important to the work of the Police and Crime Commissioner (PCC) and to that of the Police and Crime Panel. Briefings were provided for PCC candidates to summarise Brighton & Hove's key community safety issues. Further partnership working with the elected Commissioner aims to build shared priorities that will also be set out within the Commissioners Police and Crime Plan (expected publication January 2013).

**2. RECOMMENDATIONS:**

- 2.1 That the Policy & Resources Committee note and recommend Full Council to approve the crime reduction and safety priorities included within the updated Community Safety, Crime Reduction and Drugs Strategy 2011 – 2014.
- 2.2 That the Policy & Resources Committee note the summary of some of the new work included within the Strategy together with action being taken to improve value for money.

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

3.1 The Safe in the City Partnership approved the Community Safety, Crime Reduction and Drugs Strategy 2011 to 2014 at its meeting on 27<sup>th</sup> March 2012. The overall aims of the Strategy are to:

- Reduce crime and anti-social behaviour;
- Improve feelings of safety and meet the needs of victims of crime;
- Tackle underlying causes of offending such as drugs and alcohol;
- Take early action to prevent and 'design out' crime and;
- Reduce re-offending and achieve visible justice, including restorative justice and community payback.

3.2 The Strategy sets out how these aims are to be achieved, starting with an analysis of demographic and crime and incident information, the links with other city wide plans and an assessment of the capacity of the Community Safety Partnership to meet Home Office standards and hallmarks.

3.3 There are ten priority crime and safety areas in the Strategy, each with clear outcomes, action plans and performance indicators. The (summarised) priority crime and safety areas are:

1. That neighbourhoods are more crime resistant, communities are stronger and people feel safer (physical environment, infrastructure and quality of life);
2. That individuals are supported to lead drug free lives and harm to families and communities associated with the misuse of drugs is minimised;
3. That the health and social damage caused by alcohol use and alcohol related crime and disorder is reduced;
4. That the harm caused to individuals and communities who suffer from anti-social behaviour and hate crimes motivated by prejudice is reduced;
5. That longer term resilience to extremism by individuals and within communities is built and sustained;
6. That the safety of older people is increased and their fear of crime reduced;
7. That reoffending by those at high risk of repeat and prolific offending as well as those who are in prison for less than 12 months is reduced through partnership working and joint commissioning;
8. That young people are better protected from risks which can lead to them becoming victims and offenders (risks school exclusions, teenage pregnancy, substance misuse). That additional measures are taken with troubled families to significantly improve their life chances;
9. That domestic violence is prevented and reduced, and perpetrators are brought to justice and enabled to change their behaviours;
10. That rape, serious and other sexual offences and sexual exploitation are prevented or reduced, and successful prosecutions increased.

#### **4. SOME NEW COMMUNITY SAFETY WORK DESCRIBED WITHIN THE STRATEGY**

- 4.1 The formation of a community safety Delivery Team, operational from April this year, is a significant development of the well established integrated working of the Partnership Community Safety Team. Neighbourhood Policing Teams are now integrated with the Anti-social Behaviour and Hate Crime casework Team, the Physical Environment and Communities Against Drugs Casework Teams. These teams will be co-located with the Stronger Families Stronger Communities Team. Accountability for the Delivery Team is to the Safe In The City Partnership Board. The management structure for community safety services, currently arranged across the Police, Public Health and Public Protection is currently under review.
- 4.2 There is now improved information sharing and the development of a community intelligence model. This enables analysis of police recorded crime data alongside information from the wider partnership and neighbourhood sources and is already leading to improved co-ordination of enforcement responses, in turn building sustainable resilience of communities to reduce further crime.
- 4.3. The Strategy is based upon a new analysis of current crime and disorder and partnership data. Evidence from the last analysis showed successful work with prolific offenders and operations to disrupt drugs markets. Hence this Strategy for 2011 – 2014 did not identify a new, separate priority for acquisitive crime. On the other hand, the analysis in respect of the safety of older people together with the findings of a scrutiny review, demonstrated a need to include a new priority to reduce fear of crime amongst older people.
- 4.4. Strategy lead officers refreshed their action plans also taking into account national and local evidence of effective service models. The information below sets out some of the initiatives and ways of working which are included for the first time within the appended Strategy.

##### **Physical Environment, Infrastructure and Quality of Life**

- New approaches to communicate and consult with local people; social media, website developments which are more focused on residents' needs and increasing support to Local Action Teams in order that they can more effectively drive forward local priorities;
- Increased use of community payback to an estimated value equivalent to income of £100,000 p.a. which would otherwise not be achieved
- Innovative initiatives include Soundscape which aims to decrease the effect of unwanted noise in the city.

##### **Anti-Social Behaviour and Hate Crime including protecting those with disabilities**

- Launch of the new Casework Team Duty line enables direct reporting of hate incidents on 292735 or [communitysafety.casework@brighton-hove.gov.uk](mailto:communitysafety.casework@brighton-hove.gov.uk) . Staffed daily and arrangements for out of hours. New 'Service Offer' communicated with Racial Harassment, LGBT Forums, Local Action Teams and others. Increased reporting is resulting
- Piloting of the use of the Community Trigger to hold public services to account on unresolved community safety issues.
- Development of a good practice model which assesses the vulnerability of individuals and communities and co-ordinates actions of all agencies to reduce risks, linking closely with safeguarding procedures, new IT systems and training;

	<ul style="list-style-type: none"> <li>Sustained focus on increasing hate incident and crime reporting rates, including development of reporting centres, introduction of victim and witness service standards and training programme for professionals across the city;</li> </ul> <p>Expansion of hate crime service to include those who are targeted because of their disability and closer working with safeguarding services.</p>
Children's and Young People's services	<ul style="list-style-type: none"> <li>Responding to government's 'troubled families' agenda through integrating the Family Intervention Project into a new Stronger Families, Stronger Communities Team which will reduce the risks for 657 identified families as measured against nationally specified criteria;</li> <li>Reviewing youth offending and youth crime prevention services and re-commissioning youth services according to its findings.</li> </ul>
Alcohol	<ul style="list-style-type: none"> <li>Structuring of work to tackle alcohol misuse following the Alcohol Needs Assessment to be based on 4 domain groups (i) a cultural shift/prevention of alcohol misuse; (ii) reduction in alcohol consumption/availability (especially for young people); (iii) managing the night time economy; and (iv) identifying and treating people with alcohol problems;</li> <li>Public Health strategic leadership of commissioning programme within a joint commissioning approach and a principal of maximising the effectiveness of interventions.</li> </ul>
Drugs	<ul style="list-style-type: none"> <li>Wholesale implementation of a Recovery Model of Treatment services across treatment services;</li> <li>Renewed focus on the 18-25 year group with improved integration of services to better manage transition;</li> <li>An Independent Drugs Commission building on the Intelligent Commissioning Pilot to explore where further action might reduce drug-related deaths, and which will report in March 2013;</li> <li>Lead authority for a European-funded Communities and Families Tackling Addiction Work Programme.</li> </ul>
Domestic Violence	<ul style="list-style-type: none"> <li>The Intelligent Commissioning pilot and a national accredited framework are the basis of a new comprehensive commissioning plan with target outcomes within the areas of prevention, early intervention and provision of services;</li> <li>National accreditation of services provide by Independent third sector provider (RISE);</li> <li>Increased investment and new initiatives: <ul style="list-style-type: none"> <li>Fortnightly (multi-agency risk assessment conferences) MARACs to reduce and prevent high risk of homicide cases through police led, co-ordination of multi-agency interventions;</li> <li>Increased capacity of helpline, outreach and Independent Domestic Violence Advisors;</li> <li>Whole Schools prevention programmes in schools;</li> <li>Improved responses within the Gypsy and Traveller communities;</li> <li>16 days of events, which will lead to 'White Ribbon' city status.</li> </ul> </li> <li>Integrated strategic and operational responses to domestic violence to better deal with sexual violence, trafficking, honour-based crimes, female genital mutilation (FGM) and stalking, co-ordinated within a Violence Against Women and Girls Strategy for the city.</li> </ul>
Rape, serious sexual offences and sexual	<ul style="list-style-type: none"> <li>Sussex-wide Rape and Serious Sexual Offences Steering Group leading partnership actions to streamline criminal justice processes and increased the rate of successful prosecutions;</li> <li>Sussex-wide joint commissioning of forensic and clinical services within a</li> </ul>

violence                      Sexual Assault Referral Centre and provision of Independent Sexual Violence Advisors and Counselling Services;

- A university students prevention campaign to reduce risk factors and increase confidence to report;
- Targeted work to reduce risks for those around those working in the sex industry;
- Supported by the Community Safety Partnership, a WISE project to identify and respond to the sexual exploitation of young people (13-25 years) and integrated within safeguarding procedures.

Reducing Reoffending                      • The successful model of working with Priority and Prolific Offenders to be extended to broader range of offenders including those serving less than 12 months in custody;

- Integrated Offender Management programmes overseen by Brighton & Hove and Sussex-wide Boards with increased joint commissioning;
- New 'mental health court pilot' which meets needs and diverts offenders from the criminal justice system;
- Probation services participating in the Stronger Communities; Stronger Families programme, providing a robust approach for dealing with offending behaviour;
- Integrated Offender Management for women offenders through the Inspire Project, delivered by the Women's Centre, RISE, Threshold, Oasis and Survivors Network in partnership with Probation and community safety.

Older People                      • A new priority crime and safety area, delivering recommendations arising from a Scrutiny process and working with the Older People's Council. Actions include improved information on community safety, access to services and working towards support networks and social structures that aim to decrease the sense of isolation in older people and improve perceptions of safety.

4.5.      Work has already begun on a further refresh of the Strategy, in preparation for future years. Important developments such as those arising from the findings of the Independent Drugs Commission which will report in March 2013 will inform the future direction and delivery plans of the publication of the next Strategy.

4.6.      The aim of the Commission was to take a fresh look at the city's response to the problems associated with drug markets and drug use, and to suggest ways in which the local agencies could be more successful in reducing the drug related problems that mattered to the citizens of Brighton and Hove. Membership of the Commission includes national experts, representatives of our local universities and students, the co-ordinator of the local drug users' group, a parent of a drug user and others. Officers, from Brighton and Hove City Council (including the Community Safety Team and Public Health) and Sussex Police, have acted as advisors to the Commission.

4.7.      The four key challenges selected to be addressed are:

- Are the current strategies to prevent drug related deaths sufficient to achieve a significant reduction in the coming years?
- Are the policing, prosecution and sentencing strategies currently pursued, effective in reducing drug related harm?

- Are we doing enough to protect young people and to enable them to make informed decisions around drug use and involvement in drug markets?
  - To what extent does the treatment system meet the treatment and recovery needs of the citizens of Brighton & Hove?
- 4.8. For each challenge, a day has been allocated to hear local evidence and perspectives, and to discuss possible ways forward. There will be an overall acknowledgement in the final report, of the very effective multi-agency action taken in recent years, which has been accompanied by a significant reduction of drug related deaths in the city (a reduction from 50 in 2009 to 29 in 2011). There is also an acknowledgement of the effectiveness of police led and partnership action (Operation Reduction) to disrupt drugs supply to the city and of the importance of sustaining that operation.
- 4.9. However, for each of the challenge areas there are a number of recommendations, 22 in total. The majority of those seek systems changes within statutory services. Examples are recommendations to extend existing intelligence sharing systems to include new 'legal highs' thus reducing risks to young people, introduce more protective factors for young people to divert them from drug use, more detailed guidance for G.P. practices on the risks associated with the use of alcohol, benzodiazepines and opiates in combination, greater clarity about services for those with dual diagnosis of both mental health and substance misuse and proposed review of the effectiveness of current criminal justice diversion schemes. A consultation process will take place for some recommendations where appropriate and a final meeting of the Independent Commission will take place on March to receive the outcomes of that consultation and finalise the report for publication.

## **5. COMMUNITY SAFETY BUDGET AND SAVINGS FOR 2013-2014**

- 5.1 The Council's base budget for community safety services in 2012/13 is £2,353,000 of which £221,000 is carry forward. Home Office, ring fenced funding for the Drugs Intervention Programme is included within this allocation (£271,000)
- 5.2 The community safety budget is allocated to the Partnerships crime reduction priorities that are within the three year Strategy. The biggest allocation (£476,880) is to domestic violence services which includes funding for the MARAC coordinator (police employee) as well as commissioned and nationally accredited RISE helpline and outreach services and Independent Domestic Violence Advisors who work with high risk cases within the criminal justice system.
- 5.3 Contributions are also made to initiatives which are led by the police, children's services and other partners. For example, a £126,000 allocation is made to Operation Reduction and its supporting outreach services (successfully disrupts drug markets in the city). The total cost of the operations is significantly higher and met from the Recovered Assets programme and police resources. Allocations are also made to the Youth Offending Service (a focus on deterring repeat offenders) and to the RUOK service (a dedicated alcohol worker).

- 5.4 Allocations are also made to meet the salary and service costs of front line community safety services including to the antisocial behaviour and hate crime team (£501,000). Besides funding the appointed ASB Co-ordinator for the city and a team of 7 caseworkers, the allocation is also for a dedicated police sergeant post, the time of a solicitor who also provides corporate legal services and street outreach workers who deal with street drinking and begging.
- 5.5 The forecast reported within the Targeted Budget Management Report at TBM7 was £185,000. Urgent action is being taken to reduce that overspend including managed vacancy savings within community safety services. While continuing that management action could achieve close to a balanced budget at the end of the financial year, a new pressure of a £50k contribution to meet the costs of dilapidations has arisen as the community safety team and new Stronger Families Stronger Communities Team vacate a privately leased building and relocate to a council owned building as reflected in the forecast.
- 5.6 The indicative budget for community safety for 2013/14 is £2,163,000 subject to agreement within the budget process. This budget will be adjusted by the transfer to the Police and Crime Commissioner of some of the Drugs Intervention Programme money and some or all, of the Safer & Stronger Communities grant. While we could anticipate a reduction in the available budget of up to £400,000, discussions with the Office of the Police and Crime Commissioner are very likely to conclude with confirmation that existing budget commitments of community safety partnerships will be rolled over at least into 2013/14.
- 5.7 We will be taking every opportunity to work with the Office of the PCC, the Commissioner and East and West Sussex to align strategic approaches and crime reduction and funding priorities wherever possible.

## **6. VALUE FOR MONEY and COST EFFECTIVENESS**

- 6.1 An appendix sets out some information about indicative unit cost savings for priority crime areas. There are clearly gaps in that information, largely reliant on Home Office unit costs where those are available together with some information from the Intelligent Commissioning pilots (drug-related deaths, alcohol-related harm and domestic violence). There is a particular difficulty in developing cost benefit analysis work for community safety initiatives as much of the work is dependent on integrated working with statutory and third sector organisations and partnership responses. However, the Safe In The City Partnership Board, are to consider initiating a Value for Money exercise at its forthcoming meeting.

## **7. COMMUNITY ENGAGEMENT AND CONSULTATION**

- 7.1 The Community Safety Partnership supports a network of some thirty eight neighbourhood Local Action Teams and community led Forums, including the Racial Harassment Forum, the LGBT Community Safety Forum and the Domestic Violence Forum. These consultative Forums are also represented on

the Community Safety Forum (meets quarterly) which is chaired by the Lead Member for Community Safety. Elected Members from all parties, co-opted voluntary sector organisations, the LAT and Forum representatives and the public are therefore given many regular opportunities to come together and give feedback on their community safety concerns and the interventions that they Partnership delivers to deal with those concerns.

## **8.0 FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 8.1 The current year budget and forecast outturn is as detailed in section 5 above, with mitigating action being taken to reduce the overspend. The resources available to support the delivery of the strategy in 2013/14 will be agreed at Budget Council in February 2013 at which time information on grant streams should be known.
- 8.2 Intelligence is being gathered to evidence Value for Money within a number of workstreams as discussed in paragraph 6.1 above

*Finance Officer Consulted: Name; Michelle Herrington: Date: 22<sup>nd</sup> November 2012*

### Legal Implications:

- 8.3 The Crime and Disorder Act 1998 required that local authorities have an equal duty with the police to reduce crime and disorder in their area and to set up partnership arrangements in order to do so. The publication and delivery of a three year Community Safety, Crime Reduction and Drugs Strategy and the arrangements described in this report comply with the range of required statutory duties.

*Lawyer Consulted: Name: Simon Court Date: 22<sup>nd</sup> November 2012.*

### Equalities Implications:

- 8.4 Each priority crime area within the published Community Safety, Crime Reduction and Drugs Strategy 2011 – 2014 is evaluated for the impact for equalities and described throughout the Strategy. Overall, the objectives of the Strategy, to address the underlying causes of crime, to reduce crime and offending and to protecting the most vulnerable victims also benefit those most disadvantaged and excluded groups. Targeted work to protect women, older people, troubled families and the Black and minority and LGBT communities also aim to improve life chances and address inequalities.

### Sustainability Implications:

- 8.5 Each priority crime area within the published Community Safety, Crime Reduction and Drugs Strategy 2011 – 2014 is evaluated for the impact for sustainability and those details are set out with the Strategy. The integrated



approach of the Delivery Unit specifically aims to achieve crime resistant communities which are able to sustain that approach.

Crime & Disorder Implications:

- 8.6 The purpose of this report is to advise of the actions being taken to comply with the statutory requirement to reduce crime and disorder and improve community safety.

Risk and Opportunity Management Implications:

- 8.7 The strategic assessments which provide the evidence for the selection of crime reduction and safety priorities analyse the risks to those who live and work in Brighton & Hove and the actions that the Community Safety Partnership can take to mitigate against those risk.

Public Health Implications:

- 8.8 The delivery of the crime reduction priorities, particularly those which aim to reduce the harm caused by substance misuse, violence and abuse, fear of crime and others significantly contribute to achieving the improved health and well being of those who live and work in the city.

Corporate / Citywide Implications:

- 8.8 Reducing crime and improving safety is a high priority for the City and the delivery of the actions set out in the appended Strategy significantly contribute to wider corporate priorities particularly those of health and wellbeing, equality and sustainability and an improved quality of life for those who live and work in the city.

**9. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 9.1 The analysis of the strategic assessment of crime and disorder which is undertaken annually, considers the range of options which can be employed to reduce crime and improve safety. Decisions on the good practice models which are deployed and described within the appended Strategy are decisions which are made by the Community Safety Partnership.

**10. REASONS FOR REPORT RECOMMENDATIONS**

- 10.1 Approval required of the Community Safety, Crime Reduction and Drugs Strategy 2011 to 2014 and the financial management arrangements for its delivery.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Partnership funded projects; impacts and cost benefits
2. Community Safety, Crime Reduction and Drugs Strategy 2011 – 2014

### **Documents in Members' Rooms**

None:

### **Background Documents**

1. Strategic Assessments of Crime and Disorder 2010/11 and 2011/12.

Brighton & Hove

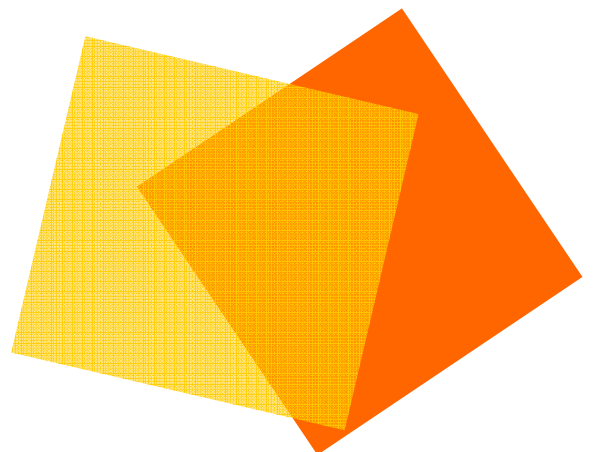
# Community Safety, Crime Reduction and Drugs Strategy

2011 – 2014

**Updated 2012**

**Safe in the city**

Brighton & Hove Community Safety Partnership



Brighton & Hove

## Community Safety, Crime Reduction and Drugs Strategy 2011 – 2014

First Revision – Updated 2012

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# Brighton & Hove Community Safety, Crime Reduction and Drugs Strategy 2011-14

First revision – updated 2012

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## **Foreword**

### **Aim of the Strategy**

This document describes Brighton & Hove Safe in the City Partnership's plans to reduce crime and disorder and improve safety. Its aims are to:

- reduce crime and anti-social behaviour, especially around issues that matter most to people;
- improve feelings of safety and meet the needs of victims of crime;
- take early action to prevent and 'design out' crime;
- tackle underlying causes of offending and reduce harm from drugs and alcohol; and
- reduce reoffending and achieve visible justice, including offenders participating in restorative justice and community payback

... and so improve the quality of life for all those who live in, work in or visit the city. The city is much better placed to tackle all these issues if all parties – local residents and businesses, community and voluntary groups, and city services – work together in a co-ordinated way and this the main reason why this Strategy has been produced.

### **Community safety and crime affects people's lives**

Although concerns about the economy have predominated in recent years, crime and disorder remain high on the list of what people think are the most important issues that face Britain<sup>1</sup>. For residents in Brighton & Hove participating in the 2008 Place Survey, a low level of crime was the factor most frequently chosen as making somewhere 'a good place to live'. The 2010 Citizens Panel Community Safety Survey showed that there was a significant level of support for continuing to prioritise the areas of work in our last strategy (2008-11).

In neighbourhoods, Local Action Teams set priorities which identify what most needs to be done to improve their area in terms of crime and disorder. Common themes identified include actions to address anti-social behaviour, issues concerning children and young people, and improvements to the local physical environment. How streets and public spaces look and feel has an impact on how safe people feel, their perception of crime, their quality of life, and the confidence they have in the police, council and other agencies to keep people safe.

For other people in the city – for example, victims of hate incidents, domestic or sexual violence survivors, and people who misuse drugs or alcohol – community safety or crime issues have a more direct effect and can severely impair their quality of life and have knock-on effects in other ways.

### **Changing contexts**

The landscape against which we have been working has significantly changed since the Crime and Disorder Act 1998 first introduced the requirement for partnerships to produce a strategy and work together to reduce crime and disorder. In Brighton & Hove

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<sup>1</sup> Ipsos MORI Issues Index

we have been successful in reducing crime with 1.4% fewer total police recorded crimes – that's 332 fewer crimes – in 2010/11 compared with 2009/10. This continues a downward trend starting from 2006/7. However, we need to sustain this progress and be able to respond to the changing circumstances of current times. While the statutory duties remain for Community Safety Partnerships and their 'Responsible Authorities', we will also be responding in the coming year to required new proposals and ways of working as well as to the important priorities for Brighton & Hove.

The introduction of Police and Crime Commissioners and Police and Crime Panels marks 'a fundamental change to the way policing has been delivered for 150 years'<sup>2</sup>. The election of the Commissioner (November 2012) will, for the first time, place a single elected representative for Sussex in a potentially key role in influencing community safety priorities.

Representation on the Police and Crime Panels will be by our lead elected Member for community safety and he will work alongside representatives from Sussex, undertaking a range of tasks including scrutiny of the Policing Plan which is to be prepared by the Commissioner and submitted to the Home Office.

Facilitating people in localities to have a greater say in how resources are used is also a priority and one which fits well with approaches already developed within community safety. Community-led Forums (the Racial Harassment and Domestic Violence Forum are examples) have long been important members of the Community Safety Partnership. More recently, we have encouraged the growth and influence of Local Action Teams (LATs) who aim to represent the community safety interests and concerns of the residents and businesses in their neighbourhood. These Forums and LATs are members of the Community Safety Forum and therefore able to have a direct dialogue with elected Members as well as officers who represent all the statutory services in the Partnership. Council plans for Neighbourhood Councils fit well with this model and in the coming year, we look forward to further developments of the localism approach within the council and wider community safety partnership. We will work towards making more information and data regularly available in order to better equip people to play a greater role in crime prevention and community safety.

### Links with other strategies and policies

The work of a wide range of agencies and strategic partnerships contributes to delivering the crime reduction and safety priorities set out in this Strategy. Action plans and work programmes of those partner agencies which overlap most closely with those set out in this Strategy, are identified in each priority area section in this document.

In the delivery of this Strategy, the Brighton & Hove Community Safety Partnership, known locally as the Safe in the City Partnership, pays attention to the findings of the Inequality Review and Joint Strategic Needs Assessment for the city. These identify key issues and inequalities across the city as well as for particular neighbourhoods and communities. Particularly relevant findings for our Partnership are around the changing demography of the city. This includes a projected population increase, a changing population profile with an increase in the number of people within the Black and minority ethnic category, and a significant variation in the levels of deprivation across the city with some areas having among the highest levels of deprivation in England.

The work in this Strategy helps to address inequalities that exist within the city's different communities in a range of different ways. The Strategy draws on the knowledge and concerns of different communities through a range of community

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<sup>2</sup> Policing in the 21<sup>st</sup> Century: Reconnecting the Public and the People, Home Office 2010

## **Community Safety, Crime Reduction and Drugs Strategy 2011-14**

engagement mechanisms. There is a close alignment with Brighton & Hove Council's Equalities and Inclusion Policy and the Community Engagement Framework. Attention is also given throughout our Strategy to the way in which our work supports environmental, social and economic sustainability and other aspects of the Sustainable Community Strategy.

In the coming year the Community Safety Partnership will be developing its relationship with the Health and Wellbeing Board, an important initiative which will particularly assist in the achievement of outcomes for those priorities where health, wellbeing and crime are most closely connected. Examples are in the areas of substance misuse and safeguarding of children, young people and adults. Progress in this initiative will be further assisted by the developing joint commissioning framework in the city which will harness the combined resources of services to achieve city-wide outcomes and priorities.

### **Achieving more with combined resources**

Cuts in public spending continue to deepen and will impact on the ability of our Partnership to keep pace with new demands. We will need to be increasingly adept at making resources stretch further and working in new ways. It will be more important than ever that the Safe in the City Partnership works together effectively. Section 17 of the Crime and Disorder Act continues to underpin the requirement that public services take into account crime and disorder implications across all areas of work within their remit.

We are continuing to work broadly within the guidance provided by the Home Office around how to achieve effective partnership working. More information about how we are ensuring that we work effectively is found in the section that starts on page 8.

### **Identifying our priority areas and activities – an evidence-based approach**

Continually striving to improve performance and outcomes is the job of the Safe in the City Partnership. Each year we undertake a Strategic Assessment and analysis of latest crime and disorder data, including intelligence and information from local people. The Strategic Assessment of Crime and Disorder 2011<sup>3</sup> on which the present Strategy is based is available on the Safe in the City website. We assess what matters are of the greatest concern for the city and the priority areas and activities we have laid out in this partnership plan, the Community Safety, Crime Reduction and Drugs Strategy, have been derived using this approach. This is our fifth three year strategy since 1998 and it covers the period from April 2011 to March 2014.

From 2010, this evidence-based approach was further embedded into the Local Strategic Partnership's approach to commissioning of services through the Intelligent Commissioning process. The Partnership Community Safety Team and Drug and Alcohol Action Team were involved in the three Intelligent Commissioning pilots during 2010/11 (relating to alcohol, domestic violence and drug related deaths) and the action plans in this document align with the work undertaken through the Intelligent Commissioning pilots.

### **Achieving our aims and monitoring progress**

This Strategy is divided into priority areas as mentioned above. Lead officers have been assigned to each area and they co-ordinate and 'progress chase' actions in the work

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<sup>3</sup> Crime and Disorder Strategic Assessment 2011 Brighton & Hove Safe in the City Partnership, to be found on the Partnership's website: [www.safeinthecity.info](http://www.safeinthecity.info)



programmes. These lead officers work closely with partnership strategic/operational groups whose members have particular expertise. These groups also help ensure work is progressed. Appendix 3 on page 126 identifies those individuals with particular responsibilities.

Measures of success help us monitor and track progress against targets and stated outcomes for each area. The action plans in the different sections of this document describe the work planned to achieve outcomes. While the action plans presented only provide brief descriptions of the work planned, they are backed up by processes which monitor outputs, targets, milestones and timescales, and who is responsible for individual actions.

Progress on key performance indicators related to the work in the Strategy is reported to the Safe in the City Partnership Board on a quarterly basis. A summary report is also presented to the Community Safety Forum and is available on the Partnership's website ([www.safeinthecity.info](http://www.safeinthecity.info)).

## Ensuring an Effective Partnership

### **Outcome: Delivery of Brighton & Hove's crime reduction and safety priorities is maximised**

The Safe in the City Partnership needs to ensure that it has the capacity and capability to deliver the priorities and objectives that are set out in this Strategy. Our Partnership in Brighton & Hove is regarded as mature and effective – we were awarded a Green Flag by the Audit Commission for the high quality of our partnership working in 2009. However, it is important that we sustain our understanding of the full breadth of crime and community safety issues in the city and that we can demonstrate effective action to deal with them.

The 'Hallmarks for an Effective Partnership', which were issued in 2007 by the Home Office and are listed below. They represent good practice and they continue for Brighton & Hove as standards we seek to achieve. The Hallmarks help us identify some activities that we will be undertaking to maximise capacity and performance during the course of this Strategy.

### **Hallmark 1. Empowered and effective leadership**

Brighton & Hove's Safe in the City Partnership Board, led by the Chief Executive and Divisional Police Commander is the responsible authority which ultimately signs off and commits to the implementation of this Strategy. The Partnership includes the Drug and Alcohol Action Team, Primary Care Trust and other health providers and brings together work on alcohol and drugs misuse with that which focuses on crime and disorder. The Board, which meets quarterly, includes senior representation from the 'responsible authorities'<sup>4</sup> as well as from other key experts and partners in the city, including the lead Member for Communities, Equalities and Public Protection and the Community and Voluntary Sector Forum. The Safe in the City Partnership Board is focused on ensuring that, strategically, all partners are working towards shared priorities and outcomes, that performance is evaluated and problem solving is shared across the partnership. We seek to sustain strong links with Children and Young People's Services and the Local Safeguarding Children and Adult Boards. Our Partnership is integrated with the Brighton & Hove Strategic Partnership and Public Service Board and our work is aligned to their priority setting and business planning decisions through the Sustainable Community Strategy and City Performance Plan.

<b>Empowered and effective leadership: Direct work to address current concerns while also building up sustainable solutions</b>
Further actions to support Hallmark 1
1.1 Ensure that protocols and arrangements for information sharing, including for sharing personal information where necessary and proportionate, are in place and being utilised to full effect for all delivery partners, including, for example, registered social landlords and RISE

<sup>4</sup> The responsible authorities are: Sussex Police Authority; Surrey and Sussex Probation Trust; East Sussex Fire and Rescue Service; Brighton & Hove Police Division; NHS Brighton & Hove and Sussex Partnership Trust; and the Local Authority.

1.2 Improve joint working with Pan Sussex Forums and Boards, including the Criminal Justice and Integrated Offender Management Boards and agencies

### Hallmark 2. Intelligence-led business processes

The Partnership is required to produce an annual strategic assessment. Strategic assessments must include community intelligence, as well as recorded crime and information from a broad range of other sources (including from the police, demographic information sources, Accident and Emergency and ambulance data, community surveys, public meetings, Local Action Teams and so on). A 'stock take' on delivery of previous community safety activities is also included. The findings of the strategic assessments provide the basis for informing community safety priorities within the Sustainable Community Strategy and City Performance Plan and also inform the allocation of resources across the Partnership and partner agencies. The new Intelligent Commissioning procedures adopted in the city from 2010 also ensure work is planned on a sound evidence base. Also, the Intelligence Analyst within the new Safe in the City Delivery Unit described under Hallmark 3 is to bring together community intelligence with statistical information from partnership sources to direct the work of the Delivery Unit.

A quarterly partnership performance report is produced which describes local trends and patterns of crime and disorder across all areas of the strategy, provides an update from lead officers on progress on the action plans and monitors performance targets. This is shared with partners and presented to the Safe in the City Partnership Board meeting so any problems identified can be dealt with through shared partnership resources and multi-agency approaches. Themed data reports on specific priorities are also produced as required to assist with the work of operational and strategic steering groups. We also provide a performance report to the Community Safety Forum where community members can help interpret data and assist with solutions to problems.

Day to day operational practice accords with the National Intelligence Model and arrangements are in place to deliver an intelligence-led, problem solving approach to enable accurate identification of problems and develop targeted solutions.

#### Intelligence-led business processes: Work is prioritised and targeted according to the findings of analysis, proven best practice and the views of local people

##### Further actions to support Hallmark 2

2.1 Further increase sources of community intelligence. Develop and embed arrangements for analysing and utilising this and other local data in the identification of problems and targeted solutions

2.2 Consult, listen and respond to the views of local communities and communities of interest. Those communities who are usually under-represented in consultation to be targeted where possible.

2.3 Ensure the Partnership has flexibility to be able to respond to new analysis and findings

2.4 Support and encourage information/intelligence sharing between members of the partnership, ensuring compliance with legal requirements.

2.5 Distribute information on crime and disorder hotspots and victim profiles between all partners who can contribute to developing solutions through multi-agency groups and information sharing procedures

2.6 Learn about best practice through published material and adopt successful methods where they might translate to local circumstances

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

2.7 Monitor performance against targets and actions in the Partnership's Strategy and keep track of other performance indicators.
2.8 Carry out annual strategic assessments to check priorities against new information, emerging trends and the views of communities and manage risk.
2.9 Evaluate and explore lessons learned from previous projects and interventions, including those that have been successful, and use this information to inform the future direction of work
2.10 Target work to reduce fear of crime at those most concerned, including towards older people
2.11 Monitor the Partnership's performance in relation to that of other comparable partnerships and learn from best performers
2.12 Contribute partnership data to <a href="http://www.BHLIS.org">www.BHLIS.org</a> (the local information part of the Local Strategic Partnership's website), enabling public access to neighbourhood level information to supplement that provided on the national police website: <a href="http://www.police.uk">www.police.uk</a> .

### Hallmark 3. Effective and responsive delivery structures

The Community Safety, Crime Reduction and Drugs Strategy 2011-14 sets out the priorities that are to be the focus of the Partnership's resources, the outcomes sought and the actions that will be undertaken to achieve outcomes, and identifies indicators against which performance will be measured. A performance management framework is in place which enables the Partnership to review and monitor progress against targets and indicators. The Strategy is published through the Partnership's website and a summary is to be available.

Delivery of the priority areas of the Strategy and 'fast time' responses to new crime and disorder problems are managed through a structure of operational working or action groups which are mobilised around a particular issue, or through the city's network of Local Action Teams and community of interest groups.

The Partnership is aware of the added value of integrating all available resources to successfully manage delivery. A key development from April 2012 is an organisational change to bring police neighbourhood policing teams into a closer working relationship with those in the Partnership Community Safety Team (PCST) through the formation of the joint Safe in the City Delivery Unit. Led by the Chief Inspector for Neighbourhood Policing, the initiative integrates the work of the area Inspectors, neighbourhood police officers and PCSOs together with the Community Safety Casework Team (anti-social behaviour and hate crime) and the Community Safety Projects Team (including the former environment improvement and communities against drugs teams) from the Partnership Community Safety Team. (The Family Intervention Project may also become part of the new Unit). The new Delivery Unit will work closely with Local Action Teams, community champions and private and voluntary sector organisations. This will further progress the multi-disciplinary approach that the Partnership Community Safety Team has historically taken to achieve outcomes that would otherwise have not been possible. There also remains the future potential for extending involvement in the joint Delivery Unit to other partners and this is to be explored.

#### Effective and responsive delivery structures: A robust performance management framework and maximisation of resources

Further actions to support Hallmark 3

3.1 Review the Community Safety, Crime Reduction and Drugs Strategy annually

## Ensuring an Effective Partnership

3.2 Seek to integrate community safety concerns into service priorities, planning and work programmes of all agencies. In particular, develop our mainstreaming and Section 17 duties of the Crime and Disorder Act ensuring that all responsible authorities are doing all that they reasonably can to prevent crime and disorder, anti-social behaviour, drug/alcohol misuse, and behaviour adverse to the environment
3.3 Develop further the opportunities for problem solving, joint approaches and sustainable solutions which come from neighbourhood policing and partnership work with local communities and communities of interest
3.4 Develop further, including through Intelligent Commissioning processes, opportunities for pooled budgets, particularly to achieve delivery of activities that achieve shared priorities across services
3.5 Continue to access external sources of funding for specific projects wherever possible
3.6 Develop further monitoring of the cost benefit and cost effectiveness of our work and the extent to which specific projects and areas of activity are economic, efficient and effective (value for money)
3.7 Increase transparency by including a financial information section of the Strategy which states how resources are being applied to deliver the Strategy and how the Partnership ensures that resources are being applied to good effect
3.8 Increase the visibility of the Partnership so that communities and partners further understand the role and added value that it brings and the good outcomes that are achieved

### Hallmark 4. Community engagement

The city's Community Engagement Framework has been agreed by the Brighton & Hove Strategic Partnership and lays out citywide commitment to community engagement through working to agreed standards.

There are particular statutory requirements to 'consult and involve' communities within the crime and disorder arena, not only about what priorities the partnership should tackle and how delivery affects them, but also to consider the way in which communities can help support the delivery of the priorities in the partnership Strategy. The Safe in the City Partnership considers that the level of joint working that is embedded within its practices provides a constant dialogue with many of its communities of interest and with those in neighbourhoods. The local audits carried out by the Community Against Drugs and Environment Improvement Teams, the network of meetings with the Black and minority ethnic and faith based communities and those with the LGBT communities all go a considerable way to achieving and sustaining high levels of community engagement.

The 36 Local Action Teams in the city are also an excellent way of directly engaging with local people about their day to day experiences. The LATs, together with the neighbourhood policing arrangements described above, provide a framework for dialogue and consultation. Though integrating our community engagement work undertaken under the banner of the Safe in the City Partnership with that undertaken by Sussex Police, the council's Communities and Equality Team, community development commissioning and other work, the Partnership's work will be informed by ongoing city wide consultation.

**Community engagement: Further development of communities' involvement in the work of the partnership and ensuring provision is accessible and suitable for all groups of citizens**

Further actions to support Hallmark 4

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

4.1 Encourage and support participation by local residents and businesses in community safety and crime prevention work
4.2 Utilise all available mechanisms to enable local communities – geographical communities and communities of interest – to inform and contribute to the work of the Partnership, for example by making links through community development and community engagement partners
4.3 Maintain our engagement with and support to Local Action Teams, providing a consistent framework through which local people and the Partnership can jointly identify problems and deliver solutions. Provide practical support to those who are prepared to ‘take a stand’ and to those who give their time and expertise to assist the Partnership with enforcement to make communities safer
4.4 Take into account the Equalities Act 2010, the detailed findings of the Inequality Review and the Joint Strategic Needs Assessment ensuring that the delivery of this Strategy is targeted towards those groups and communities who are identified as most vulnerable, at risk or excluded
4.5 Ensure training, publicity, resources, services standards, etc. take into account the needs of all communities of interest
4.6 Incorporate within the work programme for ‘building resilience to extremism’, positive initiatives and events which build community engagement and cohesion, taking the learning from that work into the mainstream of community safety work
4.7 Target measures to increase reporting at those least likely to report

### Hallmark 5. Visible and constructive accountability

We are aware that an effective partnership is one that is visible and accountable to its community for the decisions and actions it takes on their behalf. Arrangements are already in place for people in neighbourhoods and communities of interest to meet with key decision makers from the partnerships. The quarterly public meetings of the Community Safety Forum which also provide the opportunity for dialogue with elected members, ‘face the people’ meetings, and the multi-agency Forums which enable open information sharing and joint decision making are all well established in day to day community safety practice. In many contexts, that openness and accountability has developed to city-wide community-led and partnership multi-agency working (as with the Racial Harassment Forum) and targeted work in neighbourhoods (as with the Local Action Teams). In that way, and through direct feedback to individuals and groups within communities from frontline staff and caseworkers, we are letting people know about problems solved and actions taken.

The 2008 Place Survey drew attention to the fact that residents in Brighton & Hove did not feel particularly well informed or consulted about the work that the partnership is doing to tackle crime and anti-social behaviour. It also showed that there was room for improvement around the extent to which residents are confident that the police and council are dealing with crime and disorder issues that matter in their local area. This finding could be interpreted as either that we are not addressing issues that matter to local people, or that we might be addressing them but that this isn’t successfully communicated. In response to this, we particularly examined how we might address shortfalls around communication. Initial work during 2009, included a city-wide poster campaign to draw attention to the work of the Partnership, in particular how there are many and varied people, whether from agencies or local communities, whose work contributes to tackling crime and disorder. Links between the work of the Partnership and the council and police communications teams are strong and there is a regular flow of information released through press releases.



## Ensuring an Effective Partnership

The communications teams have also been assisting with a redesign of the Safe in the City website ([www.safeinthecity.info](http://www.safeinthecity.info)) and the new version will be live from early in 2012/13. Improvements include make it more user-friendly, with on-line reporting facilities and links to new social media.

### Visible and constructive accountability: Effective communication of the work and outcomes of the partnership

#### Further actions to support Hallmark 5

5.1 Provide outward and visible performance management of the priorities and targets that are being delivered by the Partnership in order to further increase feelings of public confidence and reassurance amongst communities

5.2 Produce an accessible summary of the work in this Strategy that encourages understanding within communities and supports improved visibility and accountability

5.3 Embed Community Safety Overview and Scrutiny arrangements further within Partnership processes and ensure recommendations from individual reviews are implemented

5.4 Apply branding arrangements which identify and raise awareness of work carried out by the Partnership, including that which is targeted towards communities as well as throughout the city

5.5 Continue working with the council's Communications Team to develop and promote campaigns targeted at particular initiatives with a view to reducing crime and improving public confidence. Use a variety of ways to publicise the work of the partnership, including the media, websites and local neighbourhood networks. Endeavour to ensure that messages reach out to populations in the city who are most fearful of crime or who are most vulnerable to crime.

5.6 Improve and maintain the Safe in the City Partnership website ([www.safeinthecity.info](http://www.safeinthecity.info)) and encourage its use

5.7 Help to deliver responsive, visible justice through offenders facing the consequences of their crimes through community resolution, community payback and restorative justice

## Hallmark 6. Appropriate skills and knowledge

The Partnership needs to have the necessary skills and knowledge to support effective partnership management, analysis, problem solving and the delivery of the Community Safety, Crime Reduction and Drugs Strategy 2011-14.

### Appropriate skills and knowledge

#### Further actions to support Hallmark 6

6.1 Reference the National Occupational Standards identifying any gaps in the skills and experiences of Partnership members and arranging for individual and partnership learning programmes.

6.2 Ensure elected members are kept abreast of key information to assist in decision making

## All Crime and Disorder in the City

### Outcome: Crime and disorder in the city is reduced

All crime and disorder – whether serious crimes or low level incidents – directly or indirectly impacts upon individuals and communities and damages quality of life.

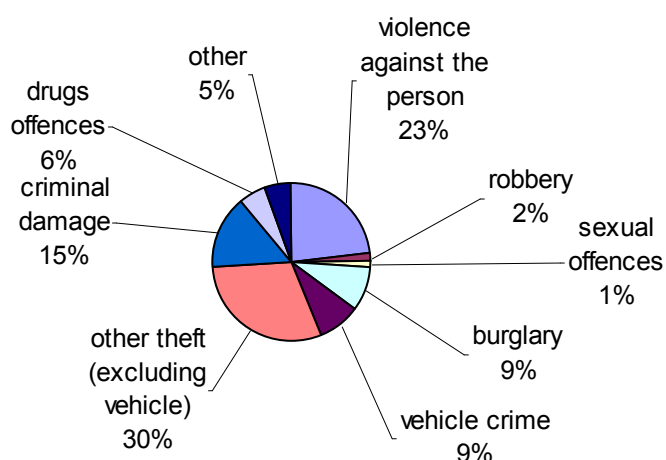
In 2010/11 there were 23,628 police recorded crimes in Brighton & Hove. About 30% of these crimes related to theft (not including motor vehicles), 23% were violence against the person offences and 15% were criminal damage.

In 2010/11 there were 1.4% (792) fewer total crimes recorded in the city than in 2009/10. Compared with other partnerships in our 'benchmarking group' of fifteen areas with similar characteristics and demographics, the number of crimes per head of population is slightly fewer than average.

Although our partnership focuses on the particular priorities as dictated by our Strategic Assessment and the priorities of local people, we continue to monitor total crime as a performance indicator locally so we can keep a check on any displacement of criminal activity away from those areas being prioritised and monitored closely by the partnership.

We also monitor levels of social disorder and anti-social behaviour. Anti-social behaviour is a priority area in this Strategy and further information is found on page 36.

**Crime breakdown, Apr 2010 - Mar 2011  
(n=23,629)**



### Key performance indicators

- Reduction in the number of total police recorded crimes
- Reduction in the number of police recorded anti-social behaviour incidents



## Physical Environment, Infrastructure and Quality of Life

**Outcome: Neighbourhoods are more crime-resistant, communities are stronger, and people feel safer**

### Sub-outcomes:

- Local communities play a key role in determining community safety priorities. They are able to access information to enable this to happen effectively
- The local environment is well maintained
- New developments and environmental redesigns are built to be crime resistant
- Local community structures are strengthened through i) increased opportunities for individuals and communities to take control over the crime and disorder issues that affect their lives and ii) individuals and communities, including seldom heard sections of the community, are supported to ensure they are provided with the information, advice and support needed to develop their confidence, skills and knowledge<sup>5</sup>
- People feel safer and make more use of outdoor spaces by day and especially at night
- There is less anti-social behaviour and crime

### Why this is a priority

The physical and social attributes of our local neighbourhoods affect how safe we feel – and feeling safe has a significant impact on quality of life. In 2008/9 the British Crime Survey found 35% of adults reported that fear of crime had a moderate or high impact on their quality of life. This was greater than the impact of crime itself which affected 25% of people.

### Background information

The British Crime Survey found that the impact of fear of crime on quality of life is higher for those who perceive higher levels of

#### Main Partners

Brighton & Hove City Council including Cityclean, Environment Improvement, Planning, Sustainable Transport, Communities against Drugs, Communities and Equality, Press, Communications and ICT Teams

Local Action Teams, residents and local businesses

Community Engagement Partnership

Other Community and Voluntary Sector organisations including, Trust for Developing Communities, Volunteer Centre, and others

East Sussex Fire and Rescue Service

Sussex Safer Roads Partnership

Sussex Police

British Transport Police

Local transport providers

<sup>5</sup> Adapted from the commissioned outcomes for the Communities and Equality Team

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anti-social behaviour and for those who have experienced crime in the last year. Other factors which may cause people to have heightened fear of crime may include: hearing about crime from neighbours/friends or through the media, having a sense of being physically weaker or vulnerable (including older and/or disabled people), being at risk of hate crime (eg: racially or religiously motivated hate crime, homo/bi/trans-phobic hate crime, or disability hate crime), or being surrounded by physical evidence of crime and disorder (eg. criminal damage, litter).

Local levels of police recorded criminal damage and other measures of environmental disorder including street appearance measures of graffiti and flyposting, have continued in their downward trend. However, non-accidental fires recorded by the fire service and levels of litter in street appearance surveys are showing stabilised levels or a slight increase during 2011/12. Data from the 2008 Place Survey, Brighton & Hove compared very favourably with our 'benchmarked' local authorities in respect of how safe people feel both during the day and after dark. However, in the 2010 Citizens Panel survey, a notable proportion of the city's residents do not feel safe, especially after dark; most respondents (93%) reported feeling safe in their local area during the day, while 62% felt safe after dark. The main reasons given for not feeling safe in their local area at night were groups of young people, drinking/drunkenness and poor street lighting. In the city centre 89% of people felt safe during the day and 50% felt safe at night (up from 36% in 2007), with the main reasons cited for people feeling unsafe being drinking/drunkenness, groups of young people, fear of violence, and noisy, rowdy and other forms of anti-social behaviour. Neither the Place Survey nor Citizen Panel surveys are to be continued, but there is a new telephone 'City Tracker' survey instigated in 2012 and this will bring certain perception measures (where not captured in the Sussex Police telephone survey) more up to date.

From the planning and design perspective, aspects such as lighting, access, activity and physical protection (and other considerations referenced in the Safe Places Statement which applications for new planning developments in the city are required to complete) are important. Also, signals of neglect in a neighbourhood can be an invitation to anti-social behaviour, vandalism and other types of crime and give a message that no-one cares.

The social infrastructure in a neighbourhood encourages people to get to know their neighbours and to access information and support. High levels of 'social capital' in an area have been shown to be associated with lower crime rates. Citizenship, neighbourliness, social networks and civic participation are key elements of social capital. It operates by impacting on the precursors of crime: levels of trust; respect; and self esteem within and between community members. The development of volunteering in local areas is a positive contribution to these ends. Communication networks are needed so local people are provided with key information and can access the community safety information and services they need. Community cohesion is also a key component of increasing trust. This is about improving relationships between people from different groups (which might be age, ethnicity, religion, or different neighbourhoods), increasing their understanding of one another and their confidence in socialising and working together.

### **Current context**

In accordance with the ongoing nation-wide drive towards a 'bottom up' rather than a 'top down' approach, local people are in a better position to determine for themselves what is important in their neighbourhood.

The Brighton & Hove Community Strategy, especially the section on Building Communities and Involving People, underlines the approach, while the Community

## Physical Environment, Infrastructure and Quality of Life

Engagement Framework sets out mechanisms to enable this to be achieved. Local Action Teams (LATs) involving the police, fire service, Environment Improvement Team and other services are set up to engage directly with residents at a local level to help facilitate improvements, and links are made with the council's Communities and Equality Team. This team enables grant funding to be made available for community development work and for locally organised events to link people within and between neighbourhoods (eg: community festivals and clean-up events, 'friends of parks', groups, etc.) There is LAT coverage across most areas of the city. Over the last few years each police beat/ward has been covered by named police officers/PCSOs within local Neighbourhood Policing Teams, enabling their relationships with local communities and local knowledge to build over time. The national website [www.police.uk](http://www.police.uk) provides a portal where residents can view police-recorded crimes and incidents which have happened in their neighbourhood. There are proposals for the information available through this website to be further developed so that local people can also find out whether perpetrators of these crimes have been identified and, if so, how they have been dealt with.

The Safe in the City Partnership is to be one of 5 areas in the country piloting the 'community trigger' in advance of new legislation expected to be introduced nationally at a later date. This will enable residents to flag up persistent anti-social behaviour problems which they feel they have not had an adequate response from the authorities. This will provide a further example where community safety improvements can be driven by local communities and where working relations between residents and statutory agencies can be strengthened.

### Where next?

The progress we have made around environmental crime and disorder and feelings of safety described above suggest that the approaches taken across the city up to now have been successful. The way forward at this point is, aligned to the government's drive towards 'localism', for the partnership to further its work with local residents in neighbourhoods, and improving intelligence to help in focus on local problems. There is a proposal to integrate the work of Neighbourhood Policing and the Partnership Community Safety Team on a trial basis from April 2012. If adopted, the 'Safe in the City Delivery Unit' will result in closer joint working and management arrangements for the support of communities. Funding for neighbourhood policing has been allocated to police forces for 2012/13, and after this time the allocation of funding will be in the hands of the Sussex Police and Crime Commissioner who will be in post from November 2012.

Themes in this action plan are around improving the quality of the local environment through planning, local improvements or maintenance, supporting local neighbourhoods to achieve community safety improvements needed in their area and providing people with the information they need to focus their resources appropriately. Good systems for information and intelligence sharing across local people and services is key.

### Links to other priority areas

This priority area cuts across many of the other themes in this Strategy. If people feel safe, this will ensure local areas are utilised more frequently, providing more 'natural surveillance' to deter potential acts of anti-social behaviour or crime. Partnership work with the probation service around community payback meets a number of objectives related to reducing reoffending and community justice, as well as achieving environmental improvements. The community payback scheme delivers work for the city to a value of over £100,000 per annum.

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

This priority area also feeds into a number of the themes in the Sustainable Community Strategy, including: *promoting enterprise* and *enhancing the environment* through work to improve the quality of the environment, and around *strengthening communities and involving people* through support to local community networks.

### Implications for equalities and sustainability

As mentioned above, some groups of people may have a sense of being weaker or more vulnerable. Being a member of one or more of the Equalities Act 2010 'protected characteristics' groups (eg. related to age, gender, ethnicity, disability, religion/belief) may increase fear of, and possibly the likelihood of, experiencing crime. If people feel safer when outdoors, they will be more disposed to use outdoor areas. This affords opportunities for getting acquainted with others in the local community and reducing isolation. Better community cohesion can lead to increased involvement in and contribution to communities, neighbourhoods and the city. Greater confidence in the police and other statutory agencies can lead to potentially increased co-operation in relation to crime, preventing violence extremism and increased civic engagement. They may be more inclined to use sustainable modes transport rather than private vehicles which is good from both health and environmental aspects.

### Parallel plans

<ul style="list-style-type: none"><li>• Brighton &amp; Hove Community Strategy – especially Strengthening Communities and Involving People section</li><li>• Brighton &amp; Hove Strategic Partnership's Community Engagement Framework</li><li>• Local Development Framework, City Plan (previously the Core Strategy) and Supplementary Planning Documents</li><li>• Brighton &amp; Hove Local Policing Plan</li><li>• CityClean Strategy</li></ul>	<ul style="list-style-type: none"><li>• Communities and Equality Team Plan 2012-15</li><li>• Brighton &amp; Hove Volunteering Strategy 2010-15 and Action Plan</li><li>• East Sussex Fire Authority Strategic Plan 2010/11-2014/15 and Brighton &amp; Hove Borough Plan</li><li>• Brighton &amp; Hove Road Safety Plan</li></ul>
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### Key performance indicators

- % of people feeling safe in their neighbourhood and in the city centre both in the daytime and after dark
- % of people who believe that the police and partners are dealing with issues that matter in their local area
- % of roads with unsatisfactory levels of graffiti and litter
- Number of police recorded criminal damage offences

Physical Environment, Infrastructure and Quality of Life Action Plan	
Area of work 1	
<b>Maintain an effective structure, co-ordination and targeting of crime reduction and community safety resources in neighbourhoods and across the city. Ensure good communication between communities (both geographical communities and communities of interest) and services</b>	
Actions	
1.1	Section 17 of the Crime and Disorder Act 1998 (which requires the local authority and police authority to carry out their work with due regard to preventing crime and disorder) to be promoted and monitored for compliance
1.2	Maintain and develop the work of the city's Local Action Team network, with the continued participation of local officers from partnership agencies, including neighbourhood police, council and fire and rescue service. Develop the concept of 'Street Focus' to respond to localised concerns by involving partners at the precise point of need for their services.
1.3	To contribute to processes around the proposal to work within the joint Safe in the City Delivery Unit, bringing together Neighbourhood Policing Teams and the Partnership Community Safety Team in an integrated unit, with improved information and intelligence sharing.
1.4	Support LAT Chairs events, introducing key partners and agencies who can deliver changes that will reduce crime and anti-social behaviour in local areas
1.5	Review the 'Guidance for Local Action Teams' document and ensure it is kept up to date and addresses equality and community engagement issues.
1.6	Ensure communication flows operate smoothly between LATs and the wider partnership. Develop and support the use of appropriate communication such as twitter, flickr and social networking media to attract interest and new membership of Local Action Teams. Ensure a link to the 'We Live Here' online project which aims to provide new platforms for communication through technology.
1.7	Ensure a link to additional activities focussed on engaging communities of interest and identity (BME, LGBT and Disabled People), including work led by the Communities and Equality Team
1.8	Develop the Safe in the City website to become better focused towards the needs of local communities. Include a facility to report incidents online.
1.9	Maintain the ability to analyse crime and disorder information (including with mapping capability) and present findings in a user-friendly, accessible manner
1.10	Give consideration to the needs of all communities of interest when devising publicity/communication materials and media to ensure they are accessible
1.11	Enable the work of Local Action Teams to be communicated between areas to enable successful initiatives and ideas to be shared
1.12	Continue to share information around community safety issues on public transport, taking forward projects to deal with new issues as they arise
1.13	Disseminate Community Safety, Crime Reduction and Drugs Strategy, including to key persons across public sector agencies.

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

<b>Area of work 2</b>
<b>Integrate community safety and crime reduction into the planning and design of new developments and redevelopments</b>
<b>Actions</b>
2.1 Continue to integrate community safety and crime reduction objectives within the work of the council's planning department. Investigate options, and a requirement for all planning applications to have Design and Access Statements which include crime prevention measures, and seek changes that will routinely ensure these objectives are achieved city-wide
2.2 Ensure the requirements of the Safer Places Statements are met in relation to major developments
2.3 The Safe in the City Partnership to proactively seek the prioritisation of a Supplementary Planning Document on community safety
2.4 The Safe in the City Partnership to input to the council's long term planning strategy (City Plan). The Partnership Community Safety Team to continue involvement in the planning of major projects such as Brighton Station, the Level and Lewes Road
2.5 Monitor crime and disorder levels before and after planning developments to learn any lessons
<b>Area of work 3</b>
<b>Prevent or solve neighbourhood crime and disorder problems and make people are safer through partnership working, community engagement and stronger community structures</b>
<b>Actions</b>
3.1 The police, Partnership Community Safety Team (incl. the Environment Improvement and Casework Teams) and other partners to continue to support Local Action Teams
3.2 The Environment Improvement Team to maintain its involvement with other council's departments and partner agencies to identify crime or community safety issues and ways of dealing with them. Introduce neighbourhoods to possible solutions, and engage with residents and service providers to identify and deliver actions. Pursue opportunities available through the community payback scheme.
3.3 Undertake with residents local scale street appearance and design projects which address issues raised by residents. Work on city-wide initiatives to reduce the likelihood of crime/anti-social behaviour and reduce fear of crime. Encourage and support the involvement of local residents and businesses in making improvements to the physical environments
3.4 Further strengthen local community structures through the work of the council's Communities and Equality Team, the Trust for Developing Communities and other community and voluntary sector partners and support the development of volunteering.
3.5 Ensure that, where appropriate, LATs are linked into and are part of any proposals for neighbourhood council pilots
3.6 Further integrate community safety, crime reduction and community building objectives within the work of the council's highways, transport and road safety departments.
3.7 Tackle cycle theft through partnership working using education, environmental/engineering and enforcement approaches.
3.8 The Sussex Safer Roads Partnership, including Brighton & Hove City Council, Sussex Police and East Sussex Fire and Rescue Service, to improve road safety through education, engineering and enforcement as laid out in the Brighton & Hove Road Safety Strategy
3.9 Explore opportunities for working in partnership to increase road safety while strengthening communities in residential areas



## Physical Environment, Infrastructure and Quality of Life

3.10 East Sussex Fire and Rescue Service to carry out free home fire safety visits and offer a range of solutions, including the fitting of smoke detectors and domestic sprinklers
3.11 Where appropriate, ensure that improvement projects are identifiable as initiatives of the city council, other partners and local residents/businesses as part of the Safe in the City Partnership
<b>Area of work 4</b>
<b>Reduce criminal damage and arson, and improve feelings of safety, through a well maintained physical environment</b>
<b>Actions</b>
4.1 Undertake analysis of criminal damage against vehicles and respond to the findings through partnership work with different parties with relevant roles and interests
4.2 Continue partnership work to tackle graffiti through removal, physical barriers to access, murals, prosecution, etc.
4.3 CityClean to continue work on containerisation, flyposting, flytipping, waste enforcement, etc.
4.3 Continue community environmental action days which co-ordinate the activities of a range of partners to improve and maintain public spaces in local neighbourhoods
4.5 Fire and Rescue Service to pro-actively identify premises at risk of arson and work with owners/occupiers to reduce risk of fire
4.6 Fire & Rescue Service and other agencies to share resources and knowledge to identify hot spots for arson and proactively work together to reduce such incidents.
4.7 Continue Fire & Rescue Service engagement with firesetters to prevent arson through the Learning Not to Burn Programme.

## Drugs Misuse

**Outcome:** Individuals are supported to lead drug-free lives and the harms to families and communities associated with the misuse of drugs are minimised

**Sub-outcomes:**

- There are fewer young people starting to use drugs
- There are fewer young people and adults misusing drugs
- There is more support to families and communities
- Disruption of drug markets through targeted enforcement is increased

### Why this is a priority

Reducing the supply and availability of drugs and promoting recovery from drug related harms are both a national and local priority. The misuse of drugs has a direct impact on other priority areas within this Strategy. It causes physical, psychological and social harm to the individuals concerned, as well as significant disruption and cost to families and communities. Over 600 different illicit substances are now covered by the Misuse of Drugs Act 1971, comprising: class A drugs - cocaine [powder and crack], ecstasy, hallucinogens and opiates; class A and B drugs - amphetamines [including methamphetamine]; class B drugs - cannabis, mephedrone and other cathinones; and class C drugs - anabolic steroids, benzodiazepines, GBL, GHB, ketamine, and piperazines. It is estimated that in 2009-10 there were approximately 306,000 heroin and/or crack cocaine users in England and that offenders who use these drugs commit between a third and a half of all acquisitive crime. In Brighton & Hove, 45% of those people in treatment in the period Oct 2010 to Sep 2011 were parents, with 14% living with some or all of their children. Drugs misuse can have a major impact on young people's education, health, families and long term life chances. Department for Education commissioned research by Frontier Economics gives a conservative estimate that for every £1 invested in young people's substance misuse services, there will be a £2 saving within two years in crime and health costs and up to £8 savings over a lifetime in adult dependency costs.

#### Main Partners

NHS Brighton & Hove  
Surrey and Sussex Probation Trust  
Sussex Police  
Drug and Alcohol Action Team  
Communities Against Drugs Team  
Brighton Housing Trust  
Brighton Oasis Project  
CRI  
ru-ok?  
SPFT Substance Misuse Service

### Key findings from the Strategic Assessment

**Young people.** The findings of the October 2011 Safe and Well at School Survey regarding drug use trends are expected in April 2012. The number of young people in drug treatment with the specialist service, ru-ok?, has been below the baseline [162]



during the first three quarters of 2011-12. This may reflect, for example, a reduced problem population via universal and targeted prevention, or weaknesses in the identification and referral system. Nationally the number of young people using drugs is falling.

**Adults.** The number of adults in effective drug treatment has been below the baseline [1401] in the first half of 2011-12. This is similar to the national trend, [where numbers peaked in 2008-09], and may reflect a reduction in the estimated levels of problematic drug use [where numbers peaked in 2005-07] indicated by national survey. The proportion of the treatment population successfully completing treatment in Brighton & Hove has been below the national average during the last three years and measures to improve this include targeting those who have been in treatment for over four years with a view to achieving planned exits.

**Drug related deaths.** Fluctuations [between 38 and 51] in the number of drug related deaths over the last seven years [2003-09] for which data is available are difficult to ascribe to specific causes. Nationally the trend has been flat over this period, despite the injecting population, which is most at risk, growing older and being more vulnerable. The roll out of naloxone antidote administration and training, and the reduction of inappropriate benzodiazepine prescribing, are amongst a range of measures being taken locally.

**Community resilience.** With regard to public perception of drug use and drug dealing, year on year trend comparisons are difficult to make. The DAAT Communities Against Drugs Team conducts targeted street surveys to increase public reassurance regarding the effectiveness of reporting concerns to the police and alleviates those concerns by publicising measures that have been taken.

**Reducing availability.** Performance data related to numbers of stop searches and drug offences can be difficult to interpret, tending to reflect levels of policing activity rather than providing an accurate picture of the illegal drugs market in Brighton & Hove, but enforcement via Operation Reduction indicates a degree of successfully sustained drug market disruption since it was initiated in 2005.

### Current context

The national 2010 Drug Strategy describes the harms caused by the use of illicit drugs: “from the crime in local neighbourhoods, through families forced apart by dependency, to the corrupting effect of international organised crime, drugs have a profound and negative effect on communities, families and individuals.” Two overarching aims are identified: to reduce illicit and other harmful drug use and to increase the numbers recovering from their dependence.

During 2011-12, local interest has been stimulated by the holding of two events by local MPs, one attended by invited stakeholders, the other open to all-comers. Within the drug treatment arena, several meetings have been attended by the National Treatment Agency to promote improvements in recovery outcomes and renewed collaborative relationships. Work has focused on aligning services towards recovery and reintegration, with an action plan covering: workforce development and service pathways; post treatment peer support and relapse prevention; families and carers interventions; employment, training and education access; and accommodation support.

A service user and carers consultation highlighted priorities for 2012-13, including:

- improved access to appropriate accommodation, to dual diagnosis services (which cover a broad spectrum of mental health and substance misuse problems), to

## **Community Safety, Crime Reduction and Drugs Strategy 2011-14**

inpatient detoxification and residential rehabilitation, and to complementary therapies and gyms;

- increased provision of recovery mentors and buddying, of childcare support, and of mutual aid group support; and
- more information/advice on education and training, and on sexual health.

### **Where next?**

Delivery of the Drugs Misuse Action Plan in 2012-13 will be influenced by emerging new structures within and between partnership organisations. For example: work with young people will be affected by the new arrangements for Youth Service provision; Communities Against Drugs work with families and local neighbourhoods will form part of the activity of the new Joint Community Safety Delivery Unit, but will also have Public Health and Health Promotion links; and treatment services will be commissioned through the Public Health led team based in the Local Authority. For young people, there will be an emphasis on sustaining the well established role and positive outcomes of the specialist treatment service, and on assessing the level of need of the 18-25 year old group and how best to respond. As well as working to the emerging Joint Community Safety Delivery Unit agenda, the work of the Communities Against Drugs Team will also be driven by the requirements of the European funded Interreg CAFTA Project, (Communities and Families Tackling Addiction). Adult drug treatment will be reviewed to ensure services maximise the recovery and reintegration of clients; on developing a “golden thread” across the treatment system that gives a shared understanding of aims and intended outcomes; and on taking further steps to develop a robust commissioning process that will contribute to the Public Health Outcomes Framework. Operation Reduction, focusing on enforcement and reducing demand for drugs, will remain a partnership priority.

### **Links to other priority areas**

The use and misuse of illicit drugs is a significant cross-cutting factor in work with a number of other strategy priority areas, including anti-social behaviour, domestic violence, preventive and support work with young people (which will now be reported under the Children, Youth and Families chapter), as well as having a negative influence on the quality of the environment. Drug users may often have alcohol misuse issues so illicit drugs is also linked to the alcohol misuse section of this Strategy.

### **Implications for equalities and sustainability**

Work to achieve a culturally competent workforce, in order to have a positive impact on different equality groups who use services, has been sustained, and service managers are expected to be competent in the recruitment and retention of appropriate staff to support this aim. During 2011-12, the DAAT has funded multi-agency training for 156 staff on a range of courses: understanding LGBT substance misuse; positive engagement with disabled service users and with BME service users; working with DV perpetrators; and working with witnesses and survivors. Dual diagnosis was the subject of a Scrutiny Report in 2008, but progress towards addressing its main recommendations and those of a subsequent Provider Trust led Strategy has been slow. However, the NHS Brighton & Hove is currently working with the Provider Trust on a multi-agency action plan.

The local young people's population is more ethnically diverse than the Brighton and Hove population as a whole and is under-represented in service presentation. This brings challenges in being able to support different minority ethnic groups. Disability, whether physical or in respect of learning difficulties, has the potential to act as a

predisposing factor for substance misuse. There is a relatively high incidence of young people with Special Educational Needs within mainstream education, highlighting the importance of information and support about substance misuse within the school environment. Specialist equalities groups within Brighton & Hove will be commissioned to provide specialist youth work activities and work with the Youth Council to ensure youth provision across the city is accessible and inclusive. As part of this, the identification and interventions attached to substance misuse amongst young people will form a component of the training and quality assurance system.

### Parallel plans

- Adult Drug Needs Assessment 2012-13
- Young People Substance Misuse Needs Assessment 2012-13
- Public Health Substance Misuse Commissioning Plan
- Sussex Policing Plan

### Measures of success

- Number of drug related deaths (maximum 38 p.a. 2012-14)
- Number of people 18 or over in effective treatment (1.5% increase)
- Successful completions: percentage of people 18 or over in treatment who overcome dependency and do not re-present for treatment within six months
- Percentage of people 18 or over leaving treatment who do so in a planned way (50%)
- Percentage of people 18 or over who have been in treatment over four years (25%)
- Successful completions: percentage of people under 18 in treatment who overcome dependency and do not re-present for treatment within six months
- Percentage of people under 18 leaving treatment who do so in a planned way
- Number of Key Stage 4 school students reporting drug use in annual the Safe and Well School Survey

Drugs Misuse Action Plan
Area of work 1
<b>Promote universal prevention (young people)</b>
Actions
The young people substance misuse universal education and prevention agenda will be reported as part of the Children, Youth and Families Section.
Area of work 2
<b>Ensure identification processes and intervention packages are in place for young people, with appropriate referral systems to specialist treatment, and monitor treatment service impact.</b>
Actions

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2.1 Conduct ongoing reviews of substance misuse treatment pathways and modalities, in order to assess effectiveness, and to develop recommendations for improved outcomes.

2.2 Conduct a needs assessment attached to youth crime and develop a transitional plan that will be implemented as part of the Youth Justice Plan. This will include reviewing substance misuse pathways, assessment, interventions and discharge packages.

2.3 Review the engagement and participation of young people within ru-ok? and implement an improvement plan.

2.4 Revise the internal compact with the Children and Families Delivery Unit for ru-ok? integrating outcomes.

### Area of work 3

#### Minimise the harmful impact of drugs on communities

##### Actions

3.1 Support the development and operation of the new Safe in the City Partnership Delivery Unit's 'Communities Team', with closer collaboration between Communities Against Drugs, Environmental Improvement and Neighbourhood Policing Teams in response to local drug and alcohol issues.

3.2 Continue to support the Local Action Teams by responding to issues raised by local residents and workers in targeted hotspot areas, and implement tasks identified by Drugs Intelligence Group meetings.

3.3 Develop and implement the 'Communities and Families Tackling Addiction' [CAFTA] European Project, by setting up a project working group and communicating project progress to provide a platform for communities to shape project activities.

3.4 Incorporate restorative elements to existing youth disposals delivered by Targeted Youth Support, using the experiences of local residents to inform young people of the impact this has on communities.

3.5 Design and develop a restorative justice community conferencing model to address problems in local neighbourhoods caused by drugs or alcohol.

3.6 Implement recommendations from the Public Injecting Evaluation and Response [PIER] consultation to reduce the impact that drugs litter has on local communities in two pilot areas.

3.7 Build upon the current Neighbourhood Liaison model and programme of activities using a community guided bottom-up approach to concentrate this work on smaller geographical communities/areas.

### Area of work 4

#### Minimise the harmful impact of drugs on families

##### Actions

4.1 Maintain and support the CRI PATCHED Families Service and sustain links with the Families of Prisoners' Group.

4.2 Develop family training and mentoring previously identified within European Funding bids to improve outcomes of both the drug/alcohol user and their family.

4.3 Develop a skills programme for professionals on ways of working, use of language and understanding the needs of families and affected by addiction.

4.4 Disseminate 'Post Warrant Pack' to family members through PATCHED Service, Family Intervention Project, Police and Courts.

4.5 Co-ordinate and facilitate the annual Sussex Families Conference in June 2012, which will launch the CAFTA project, based on the theme of communication between professionals and families.
4.6 Share European partners' innovative educational activities to increase young people's awareness of drug related harm and consult young people to develop activities to implement locally.
4.7 Review and implement a joint working protocol across children's and adult services when working with families where substance misuse is an issue and support year one with training, with review of learning via action learning sets aimed at managers.
<b>Area of work 5</b>
<b>Improve access to, and effective engagement with, drug treatment services</b>
<b>Actions</b>
5.1 Successfully completed. Satellite Services are now available at three different locations in the central, east and west areas. The Single Assessment Process has become well established, whereby staff from all agencies deliver comprehensive assessments for entry into the treatment system from a variety of settings.
5.2 Work with Equality and Diversity Manager has been initiated to identify the most appropriate ways of reaching diverse communities within Brighton and Hove
5.3 Continue work on developing a system-wide Dual Diagnosis (mental health and substance misuse) action plan to support the Dual Diagnosis Strategy and Operational Policy, together with dialogue between Public Health, Primary Care and Mental Health leads to ensure mental health services address dual diagnosis issues.
5.4 Consider the options available for developing an effective substance misuse treatment intervention for young people aged 18-25 where the primary substances of choice are alcohol and cannabis, and whether there is a need to develop a Transitions Service.
5.5 Continue to provide training in relation to domestic violence for all substance misuse staff to improve identification of victims/perpetrators of DV and onward referral into relevant programmes such as Living Without Violence. In consultation and collaboration with key agencies, to develop and implement an action plan to improve access and engagement of victims and perpetrators of domestic violence in substance misuse treatment
5.6 Continue to improve commissioning processes to enable the needs of communities of interest to be recognised and responded to, in full compliance with the six strands of equality legislation; ethnicity, gender, disability, age, sexual orientation and religion or belief.
<b>Area of work 6</b>
<b>Improve treatment effectiveness and successful outcomes for substance misuse treatment services</b>
<b>Actions</b>
6.1 Conduct ongoing review of substance misuse treatment pathways and modalities, in order to assess effectiveness, and to develop recommendations for improved outcomes. To develop an improvement action plan and implement treatment system changes, integrating outcomes with future commissioning plans.
6.2 Sustain improvements in the effectiveness of the care-co-ordination function and care planning process by monitoring the impact and outcomes of the BTEI model (Birmingham Treatment Effectiveness Initiative) across all tiers/services.

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6.3 Sustain the implementation of the Employment, Training and Education action plan for substance misusers, focusing on priority aims and objectives
6.4 Continue the excellent work of the peer led Recovery Focused Mutual Aid Groups and to evaluate impact and outcomes.
6.5 Sustain the implementation of recommendations from the Tier 4 Review Commissioner and Provider action plans aimed at improving outcomes for abstinence focused treatment interventions
6.6 Build on the NTA led workshop in October 2011 to promote a Golden Thread approach to performance management, whereby partnership aims are translated into collectively agreed measures and targets, underpinned by ownership and accountability at the point of delivery and rigorous review and reinforcement of good practice.
<b>Area of work 7</b>
<b>Reducing Supply: protection of communities through robust enforcement to tackle drug supply, drug related crime and anti-social behaviour.</b>
<b>Actions</b>
7.1 Sustain the resourcing of Operation Reduction, which remains a high priority for the Community Safety Partnership.
7.2 Sustain the work of the Communities Against Drugs Team's contribution to the process of engaging and involving local communities in tackling local substance misuse issues and reporting drug dealing and drug related activity, bolstered in 2011-12 by the award of Interreg funding [see paragraph 3.3 above] to support this work.
7.3 Assess the justification for, and viability of, continuing a pan Sussex Reducing Supply Group, which has yet to be determined, following the postponement of a stakeholder conference scheduled for 13.1.12, convened by Sussex Police.
7.4 Consider, in the light of the demise of the previously well supported South East Regional Availability Group in 2010, whether aspects of the regional Reducing Supply Action Plan - including improved drug detection and identification; reduced supply in prisons; effective use of seized assets; and enhanced publicising of enforcement activity – should be picked up at a Sussex wide rather than Divisional level.



## Alcohol Misuse and Alcohol-related Crime and Disorder

**Outcome:** There is less health and social damage caused by alcohol use, and alcohol-related crime and disorder is reduced

**Sub-outcomes:**

- There is a city-wide cultural shift which challenges and changes tolerance to problematic drinking
- There is a reduction of alcohol consumption across the city through measures to reduce its availability, especially to young people and heavy drinkers
- The impact of alcohol harm arising from the night-time economy is reduced
- There is effective early identification/screening, treatment and aftercare for alcohol misusers

### Why this is a priority

A number of aspects which characterise the nature of the city of Brighton & Hove are linked with alcohol consumption. There are economic and social benefits to be had from the leisure and tourism industry, but in contrast, the financial cost of alcohol misuse in the city attributed to health, crime and economic loss, is estimated at over £100 million per year. At the individual's level, alcohol misuse can impact severely on quality of life and wellbeing by affecting health or relationships. Individuals can also suffer from alcohol-linked crime and disorder such as violence, sexual violence and abuse, criminal damage, late night noise and other anti-social behaviour.

Local Alcohol Profiles data as of December 2011 show that that alcohol-related problems in Brighton & Hove remain matters of concern. We continue to have a poorer profile than the average of all 324 local authorities in England on 24 (out of a total of 25) measures related to crime, health and drinking levels, although across the board the position has slightly improved over the last year<sup>6</sup>. Our position was better than average in just one area (alcohol-related land transport deaths). Alcohol-related hospital

#### Main Partners

NHS Brighton & Hove  
Brighton & Sussex University Hospitals NHS Trust  
Licensees  
Drug and Alcohol Action Team  
Brighton & Hove City Council (Housing; Licensing; Trading Standards, Anti-Social Behaviour Team)  
CRI  
Sussex Partnership Foundation Trust  
Young People's Substance Misuse Service (RU-OK)  
Sussex Police  
Mind  
Surrey and Sussex Probation Trust  
Brighton Oasis Project  
Brighton Housing Trust

<sup>6</sup> Local Alcohol Profiles tend to report data with a time lag of about two years

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admissions, while remaining mostly within the poorest 25% of local authorities, are showing some signs of improvement relative to other areas. Latest available data indicate that the number of alcohol-related deaths overall remains a significant issue, but there are some signs of an improvement for males, while the position for females has deteriorated.

Alcohol-related violence occurs both in a public place and a domestic setting. When compared with our 14 'most similar community safety partnerships' benchmarked for crime and disorder risk, we rank at the average position for violence against the person offences per head of population (while remembering that Brighton & Hove has a significant number of visitors in the city). We have good evidence that work over recent years has been successful in tackling alcohol-related crime and disorder. Levels of police recorded injury assaults (1,880 in 2010/11) and criminal damage (3,629 in 2010/11) continue to show long term downwards trends. These encouraging results are backed up by survey information which show that fewer people feel that drunk and rowdy behaviour is a problem in their local area (a drop from 64% in 2003 to 34% in 2008).

However, alcohol remains easily affordable and accessible for many young people and underage consumption of alcohol is a problem. The most recent survey data (TellUs4 2009) showed that the number of young people under 16 drinking 3 times a week or more showed no signs of decreasing and was worse than the national average.

### Current context

An Alcohol Programme Board, chaired by the Director of Public Health, with senior input from across the city (health, licensing, police, probation, universities, community safety) was established in 2011 to better co-ordinate strategic efforts to tackle the adverse consequences of alcohol consumption in Brighton and Hove. The Alcohol Programme Board had initial project management support from the NHS Healthy Places, Healthy Lives initiative and was also able to capitalise on commissioning developments with the Public Health Directorate assuming responsibility for commissioning for alcohol and substance misuse, and local authority Intelligent Commissioning work which included a pilot on alcohol. As a result of this work the Alcohol Programme Board agreed an Action Plan with targets in 4 domains:

1. Addressing the drinking culture
2. Availability of alcohol
3. Night time economy
4. Early identification, treatment and aftercare

The Big Alcohol Debate was a key action under Domain 1 (Addressing the Drinking Culture) and started in October 2011 finishing in the first week of January 2012. The Debate used a number of media in an attempt to capture the range of opinions about the role alcohol plays in the city as expressed in the opinions of local residents and visitors. A number of themes have emerged from the debate:

- Alcohol is too available in the city
- Low cost alcohol is an issue
- 'Pre-loading' before going out
- Cheap deals in bars
- Perception that the rules around alcohol are not being enforced eg. serving of drunks
- Education – need to start at an early age



- Avoidance of the city centre at certain times due to the culture of drinking in some areas
- A lack of places to socialise where alcohol isn't a main focus.

Domain 2 focuses on the 'availability of alcohol'. The key objective of this domain is to *'reduce the consumption of alcohol across the city focusing in particular on young people and heavy drinkers'*. In keeping with the results of the Big Alcohol Debate, the boundaries of the cumulative impact zone were reviewed. The initial boundary covered 0.8% of the city area, although the area included 20% of all alcohol retail outlets and was the area where 40% of alcohol-related crime occurred. Within the cumulative impact zone there is a presumption of refusal for all new licence applications whether for on-sales or off-sales alcohol retailing. Following the Big Alcohol Debate and approval by the Licensing Committee, the cumulative impact zone was extended to cover 1.5% of the city area.

Domain 2 also focuses on minimum pricing issues. The Alcohol Programme Board chair together with the elected member chair of the Licensing Committee have written to the Home Secretary on two occasions asking for consideration of a minimum price for alcohol per unit, and asking for consideration of differential VAT ratings for local pubs and off-sales to encourage the development of community pubs and discourage cheap off-sales which are used by young people to pre-load and by other residents, sometimes older people, to drink to excess alone at home. Following the debate, the Programme Board has also agreed to pursue work with the consortia of primary care trusts in Greater Manchester calling for collective bye-law action on minimum pricing.

Domain 3 focuses on 'night time economy'. The key objective in this domain is *'to reduce the impact of alcohol harm arising out of the night time economy'*. The Alcohol Programme Board helped facilitate a project to capture better information on the location of assaults on A&E data systems to supplement that recorded by the police. This model of working, first developed in Cardiff and hence known as the 'Cardiff Model', has been found to reduce assaults. This improved level of information is being used to help target operational policing and other partnership work and inform licensing reviews. Another area for focus has been 'Safe Space', which helps those who have become distressed or injured as a result of alcohol use. It delivers advice, medical interventions, practical and emotion support to visitors and residents partaking of the city's busy nightlife scene.

Domain 4 focuses on 'early identification, treatment and aftercare'. The key objective in this domain is *'to reduce the risk from consumption of alcohol through effective early identification and screening, and onward referral to appropriate treatment and aftercare'*. A range of alcohol health promotion and treatment services are commissioned across the various tiers of services in Brighton and Hove. The overarching aims of these services are to identify at risk and dependent drinkers, and provide information, advice and support to them. Services are provided in partnership, with both statutory and voluntary sector substance misuse services. Non-specialist front line workers are offered training to enable them to identify individuals and signpost them to appropriate services.

Domain group 4 considers the needs of people with alcohol related issues in the city with a view to ensuring that the right services are commissioned going forward. Strong partnership working enables this to happen. A focus for the future will be developing aftercare support services so that those who successfully complete treatment are supported to prevent relapse. To ensure proper scrutiny, greater attention will be given

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

to discussing performance related issues with providers of alcohol misuse services as is already the case with drugs misuse services.

### Where next?

In 2012/13 the work of the Alcohol Programme Board, and the four associated domain groups will continue. A joint commissioning plan across all domains will be developed to outline priority areas for development.

A national Alcohol Strategy is expected to be published in March 2012. This will be implemented locally where appropriate.

### Links to other priority areas

Work to tackle alcohol misuse will impact positively on work around domestic violence, sexual violence and abuse, the physical environment and quality of life, and the hate crime areas in this Strategy. In addition to the Reducing Crime and Improving Safety priority in the Sustainable Community Strategy, other priorities which are most directly supported by our work in this area are: Improving Health and Wellbeing; and Promoting Enterprise.

### Implications for equalities and sustainability

Men are more likely than women to be admitted to hospital and to attend A&E for alcohol-related reasons. They are also more likely to be a victim of violence, except for domestic violence or sexual violence when females are more often the victim. Groups who are particularly vulnerable to misusing alcohol and at risk of social exclusion include: people with mental health and complex needs (dual diagnosis); users of other substances; rough sleepers; street drinkers; people in need of housing support; offenders; and victims of domestic violence. As mentioned above, the cost to public services to deal with the consequences of alcohol misuse is significant.

### Parallel plans

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Children and Young People's Substance Misuse Plan</li><li>• Brighton &amp; Hove Divisional Policing Plan</li><li>• Local Transport Plan</li></ul> | <ul style="list-style-type: none"><li>• Brighton &amp; Hove Statement of Licensing Policy</li><li>• NHS Brighton &amp; Hove Strategic Commissioning Plan</li><li>• Public Health Annual Report</li></ul> |
|---|--|

### Key performance indicators

Outcome indicators for 2012/13 still need to be confirmed by commissioners, but are likely to be:

- Percentage of patients leaving alcohol treatment who completed successfully (no longer requiring structured alcohol treatment) – 50%
- No. of alcohol related hospital admissions/1000 population – 2665 per 100,000 population (2% lower growth relative to trend)

In line with outcome indicators that may be developed for substance misuse services, the following may also be developed:

- Percentage of successful completions (planned exits as a proportion of the treatment population)
- Percentage of those in treatment who overcome dependency and do not re-present to treatment within six months.

Other indicators:

- Number of police-recorded assaults with injury

## Alcohol Misuse and Crime and Disorder

- The percentage of people who believe that drunk and rowdy behaviour is a problem

Alcohol Misuse Action Plan – Summarised from the Alcohol Programme Board's full Alcohol Action Plan	
<b>Area of work 1 (Alcohol Programme Board)</b>	
<b>Strong strategic leadership to reduce alcohol-related harm through providing appropriate governance and infrastructure to enable effective partnership working</b>	
Actions	
1.1	Alcohol Programme Board provides leadership
1.2	A clear communications plan drawn on by other strategic partnerships
1.3	Resources protected to support the work in this action plan
1.4	Effective and timely performance monitoring
1.5	Effective partnership working
<b>Area of work 2 (Strategy Domain Group 1)</b>	
<b>Achieve a city-wide cultural shift which challenges and changes tolerance to problematic drinking</b>	
Actions	
2.1	Continue the work of The Big Debate for Alcohol. Feedback on views collected and how these will be acted upon.
2.2	Develop a city-wide media and communications strategy
2.3	Developed and evaluate targeted social marketing programmes to reach identified priority audiences (e.g. men <35, young people aged 10-15yrs)
2.4	Identify ways of intervening with young people to provide appropriate advice and support around drugs & alcohol
2.5	Promote sensible drinking messages to enable employers to make informed choices and ensure access to specialist services as required
2.6	Implement a consistent & effective drugs & alcohol workforce policy across the city
2.7	Training for priority workforces in early identification is promoted & encouraged
2.8	Work with managers of key services to implement a new system of consistently screening, intervening and referring to appropriate services for those at increased risk who are pregnant or have children under 5yrs
2.9	Work with managers to improve existing screening, intervention and referral process for young people at increased risk of substance misuse, particularly those aged 13-18yrs
<b>Area of work 3 (Strategy Domain Group 2)</b>	
<b>Reduction of alcohol consumption across the city through measures to reduce its availability, especially to young people and heavy drinkers</b>	
Actions	

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3.1 Take forward revised Cumulative Impact Zone boundaries and use Matrix Model to review existing/future licensing decisions
3.2 Stakeholder event held to improve community engagement in licensing decisions
3.3 Strengthen links between licensed trade (pub watches etc.) and local action teams
3.4 Public health to be a licensing consideration
3.5 Influence planning policy to alter the number of new off-licences through reclassification of off licenses from A1 (retail) to its own use class (DCLG) and seeking greater restrictions on A1 (off licences) and A5 (pubs and bars)
3.6 Neighbourhood plans developed under Localism Act
3.7 Seek integration of council policies as commercial landlord, planning authority and licensing authority
3.8 Continue to lobby for minimum unit pricing (Home Office). Rethink using duty + VAT as “below costs”
3.9 Continue to lobby for lower differential VAT rate on alcohol for on licences (Treasury with EU dispensation)
3.10 Counterfeit, smuggled alcohol investigations to reduce availability of illegal alcohol
3.11 Proxy purchase and test purchasing investigations to reduce availability to young people
<b>Area of work 4 (Strategy Domain Group 3)</b>
<b>Reduction in the impact of alcohol harm arising out of the night-time economy</b>
<b>Actions</b>
4.1 Work with the local authority arts team to develop alternative events throughout the year which encourage responsible drinking and promote the city as a focus for cultural activity which is attractive to all groups
4.2 Encourage alternative activities for children and young people through the effective oversight of collective services as directed by the youth service review
4.3 Support a scheme developed by businesses selling alcohol for consumption on and away from the premises, which encourages the highest standards of practice and community responsibility
4.4 Work within the partnership to ensure that any late night levy is used to best effect in managing the reduction of alcohol-related harm within the night-time economy
4.5 Control and influence behaviour in public areas through planning and development opportunities. Protect existing people-calming measures while exploring new opportunities to shape attitudes
4.6 Cardiff Model to continue in A&E to reduce the risk of assaults and injuries occurring within licensed premises
4.7 Support a reduction in serious assaults within licensed premises by encouraging the development of viable service alternatives
4.8 Protect existing measures and initiatives which already prevent harm. Ensure that effective interventions are in place and stakeholders recognise their role in reducing alcohol-related harm.
4.9 Support the existing Park and Marble operations with opportunities to divert, refer and manage persistent and high risk offenders e.g. curfews
4.10 Support co-ordinated health campaigns by offering opportunities to publicise key messages as well as promote alternatives to binge drinking

<b>Area of work 5 (Strategy Domain Group 4)</b>
<b>Effective early identification/screening, treatment and after care for alcohol misusers</b>
<b>Actions</b>
5.1 Provide alcohol awareness and identification/screening training packages and support for Tier 1 and 2 workforce, eg. ante/post natal staff (midwives, health visitors), mental health staff, housing/hostel workers, domestic violence workers, social workers
5.2 Restructure community brief interventions service to focus on extended interventions.
5.3 Continue to work on improving uptake and outcomes through Brief Intervention Services within A&E and Primary Care settings
5.4 Understand need for transition services for young people, and develop services accordingly.
5.5 Continue with Frequent Flyers: Assertive Outreach and Engagement pilots focusing on A&E/Hospital and hostel residents
5.6 Continue to review commissioning of tier 4 Residential Rehab treatment services
5.7 Consider other areas for development in 2012/13, dependent on need and funding available, eg. Women's Group Aftercare Programme, aftercare/recovery/relapse prevention service, additional Health Promotion support and training, etc.

## Anti-Social Behaviour

**Outcome: Harm caused to individuals and communities by anti-social behaviour and hate crimes/incidents is prevented and reduced**

**Sub-outcomes:**

- There is less harm caused to individuals and communities by anti-social behaviour
- There is less anti-social behaviour in Brighton & Hove
- There is increased confidence and satisfaction in communities
- There are lower levels of perceived anti-social behaviour

Anti-Social Behaviour (ASB) is defined by the Crime and Disorder Act 1998 as “*acting in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as (the defendant)*”. This behaviour is broken down into four main categories; the misuse of public space, disregard for community/ personal wellbeing, acts directed at people, and environmental damage.

### Why this is a priority

Anti-social behaviour and hate motivated incidents are a serious issue which can have a detrimental impact on the lives of the individuals and communities who are exposed to it. The impact on individuals can cause significant harm and affect their quality of life and wellbeing. Within a community, anti-social behaviour can lead to the deterioration in the appearance of an area and fuel fear amongst residents who become reluctant to go out at night or utilise community spaces.

The number of anti-social behaviour incidents recorded by the police in 2010/11 was nearly 20,000 and this is a similar number to that in each of the preceding two years. Recorded numbers in the first half of 2011/12 are showing an increase of 17%, although changes to recording processes may, at least in part, provide an explanation for this increase. In 2009/10 635 reports of anti-social behaviour were made to council housing and 213 cases of anti-social behaviour were dealt with by the Partnership Community Safety Team.

A needs analysis undertaken in 2011 identified that certain groups of people within a community are at higher risk of becoming victims of anti-social behaviour. These groups include those who are living in high density housing, those living in deprived areas of the city or those who have an illness or disability. There are also risk factors which contribute to the likelihood of a person becoming a perpetrator of anti-social behaviour such as poverty and inadequate housing, poor parenting, school exclusions and a lack of education and employment.



## Current context

Brighton & Hove has had a range of anti-social behaviour services in place since 2003. The city's overall approach between the police and city council is to work in conjunction with partner agencies to support individuals and communities who are suffering anti-social behaviour, while undertaking casework with the perpetrators. The casework model uses a mixture of support, diversion and enforcement to reduce an individual's anti-social behaviour and ensure that the underlying factors which contribute to a person's behaviour are being addressed.

In September 2011 the anti-social behaviour team and hate crime team merged and integrated their services to become the Community Safety Casework Service focused firmly on implementing good practice casework approaches to reduce risk and harm. (The sections in this Strategy which focus on hate crime issues other than the casework aspect are to be found from page 88 onwards.)

The Casework Service is one of a number of teams working to tackle anti-social behaviour across the city including Sussex Police, housing strategy and housing management, the Targeted Youth Support Service, the Family Intervention Project, the Business Crime Reduction Partnership, CRI (Crime Reduction Initiatives) and registered social landlords. These agencies work together to improve services and to develop innovative ways of working with victims, perpetrators and communities. The strong partnership between these agencies has placed Brighton & Hove at the forefront of work to tackle anti-social behaviour and hate incidents. However there is always a need for agencies across the city to develop and improve their services in line with good practice and new legislation.

Reducing anti-social behaviour has been identified as a priority for the government. A 2010 HMIC report identified failings nationally in the way that the police and partner agencies tackled anti-social behaviour. The report recommended a more harm centred approach to tackling anti-social behaviour which includes assessing the vulnerability and degree of risk of victims and witnesses of anti-social behaviour, understanding what works and ensuring that partnership processes do not cause a delay in the tackling of anti-social behaviour. Following this, in February 2011 a consultation paper *More effective responses to anti-social behaviour* was published highlighting the government's intention to introduce new tools and powers to assist front line practitioners in tackling anti-social behaviour.

Brighton & Hove has made steady progress in implementing some of the key HMIC recommendations, as well as the recommendations which followed the tragic suicide of Fiona Pilkington in Leicestershire in 2007, who suffered serious and prolonged anti-social behaviour and hate crime. In line with these recommendations Brighton & Hove has introduced service standards for victims and witnesses and a victim and witness vulnerability assessment, which is used as a

### Main Partners

Communities  
Community Safety Casework Team  
Sussex Police  
Children & Young People's Services  
Family Intervention Project  
Council Housing and Housing Strategy  
Registered Social Landlords  
Business Crime Reduction Partnership  
Local Action Teams  
Youth Offending Service  
Targeted Youth Support Service  
East Sussex Fire and Rescue Service  
Surrey & Sussex Probation Trust  
HM Courts Service  
Crime Reduction Initiatives (CRI)  
Adult Social Care  
Parenting Pathfinders team  
Sussex Partnership NHS Trust

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method for identifying and supporting the most vulnerable victims in the city.

### **Where next?**

The shift to a victim-centred approach to tackling anti-social behaviour and hate incidents, which measures the harm caused to individuals and communities, is already well underway in Brighton & Hove. However, this work will continue to be developed with victim feedback and monitoring being key to developing the service in the future. Good practice such as identifying vulnerable victims and ensuring they are adequately supported is in place within a number of agencies, although this practice still needs to be rolled out consistently across the city. The introduction of new tools and powers will present a challenge to local agencies that will be looking to adapt their working practices and train front line staff in their use.

Being able to maintain an overview of levels and patterns of anti-social behaviour and hate crime in the city is also important to inform service delivery and the best way of achieving this needs to be agreed and taken forward.

Following the consultation which ended in May 2011 and the Home Office have committed to publishing draft legislation by Spring 2012. The consultation described eighteen powers being replaced by five new simplified measures, one of which is a new statutory duty on local community safety partnerships to respond to issues raised through a 'community trigger'. Brighton & Hove is to be one of five areas around the country to pilot local implementation of the community trigger.

### **Links to other priority areas**

Anti-social behaviour is closely linked with a number of priority areas contained within the Community Safety Strategy. The needs analysis identified alcohol use as key to some of the work being undertaken in the city to tackle anti-social behaviour, including Operation Park which aims to reduce underage use of alcohol and anti-social behaviour and the work undertaken by CRI with street drinkers committing anti-social behaviour. A number of clients in the Casework Service will also be alcohol or drug dependent or have problematic use of substances which contribute to their anti-social behaviour.

The teams tackling anti-social behaviour within Brighton & Hove will often work directly with clients suffering from or perpetrating hate crimes or domestic violence. Another cross cutting priority area of work is that with children and young people who are worked with both as victims and perpetrators of anti-social behaviour. Also, the Family Intervention Project is key to tackling anti-social behaviour and improving outcomes for families through intensive support.

The condition of the physical environment is also a factor. The needs analysis highlighted the appearance of an area as an important aspect in preventing anti-social behaviour. Finally, anti-social behaviour links with those aspects of this Community Safety Strategy which deal with more serious crime. Research identifies that minor crime and disorder is a clear driver for more serious criminality and by tackling anti-social behaviour we can reduce the risks that a perpetrator will go on to commit more serious crime in the future.

### **Implications for equalities and sustainability**

The Community Safety Casework Service and its partner agencies play an integral part in the work taking place within Brighton & Hove to tackle hate crime. The team works with both victims and perpetrators of hate crime to reduce the harm caused by anti-social behaviour which is targeted at individuals because of their race, religion, gender, sexuality or disability.



In September 2011 the anti-social behaviour team and hate crime team merged and integrated their services to become the Casework Service focused firmly on implementing good practice casework approaches to reduce risk and harm. During 2012/13 there will be further consolidation and development of a robust service on offer to communities (including communities of interest).

The Casework Service also works with a number of vulnerable individuals including alcohol and drug users, homeless people, victims of domestic violence and people with mental health problems. Services to support these groups may be offered to them either as victims or perpetrators. In the case of perpetrators the team works to address the underlying causes of their anti-social behaviour and in the case of vulnerable victims the team support them to report incidents and to access services which will reduce the harm caused to them and their families by anti-social behaviour.

Sustaining work to tackle anti-social behaviour, and the serious harm it causes to communities and individuals within Brighton & Hove is vital. Services that make the city a safer place to live, enable individuals to peacefully enjoy their own homes and allow communities to make full use of their local amenities without fear, are key to making Brighton & Hove a desirable place to live.

### Parallel plans

- |   |  |
|---|--|
| • Brighton & Hove Housing Strategy 2008-13            | • Youth Justice Plan                     |
| • Brighton & Hove Turning The Tide Strategy 2009-2014 | • Single Homeless Strategy 2009-14       |
| • Brighton & Hove Parent Support Strategy             | • Local Policing Plan 2011-14            |
| • ESFRS Strategic and Borough Action Plans            | • Safeguarding Adults Board Plan 2011-13 |

### Key performance indicators

- A comprehensive range of performance management and quality assurance measures are developed.
- The number of police recorded incidents of anti-social behaviour.
- Public confidence in police and local council are dealing with anti-social behaviour and crime issues
- Percentage of people who think that ASB is a problem in their local area

Anti-Social Behaviour Action Plan
Area of work 1
<b>Reduce the harm caused to victims and witnesses of anti-social behaviour and ensure that measures are in place city-wide to identify and protect vulnerable individuals</b>
Actions
1.1 Work with partner agencies and community groups to continue to develop the victim and witness service standards in line with good practice and feedback from victims and witnesses. In particular, continue to develop our collective partnership focused on victim and witness risk assessment tool, in particular with registered social landlords, Sussex Police, environmental health (noise) and adult safeguarding agencies.

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1.2 With partner agencies develop qualitative data regarding the feelings of victims and witnesses of anti-social behaviour within Brighton & Hove and utilise this information in staff training and to develop city-wide services to support victims.
1.3 Collect and analyse relevant information to enable levels, types and patterns of incidents to be monitored, and the effectiveness of work undertaken to be measured. Use this information to inform future service development.
1.4 Encourage the reporting of anti-social behaviour by high risk groups including those with long term illness or disabilities. Work to develop and build on relationships with agencies and third sector organisations supporting high risk groups and increase reporting by raising awareness within the city and publicising successful outcomes.
1.5 The council's Road Safety Team to seek to reduce anti-social driving/speeding through working with relevant drivers on New Driver Awareness workshops.
<b>Area of work 2</b>
<b>Reduce anti-social behaviour and re-offending through partnership working and the provision of high quality casework services</b>
<b>Actions</b>
2.1 Resource and continue to develop high quality anti-social behaviour & hate incident casework services within Brighton & Hove in line with good practice and incorporating learning points from local and national serious case reviews.
2.2 Continue to develop and sustain work to tackle anti-social behaviour among the street population through the continued commissioning of anti-social behaviour street outreach services.
2.3 Ongoing and continual review of current partnership meetings and processes to ensure that they are fit for purpose and that the tackling of anti-social behaviour and hate incidents.
2.4 Ensure that staff within the anti-social behaviour team receive regular training in equalities issues and that strong partnerships are maintained with agencies and community groups working with and representing minority groups. Continue to provide training and support to front line staff tackling anti-social behaviour and hate incidents across Brighton & Hove.
2.5 Support registered social landlords and other partners within Brighton & Hove in the delivery of anti-social behaviour services to both victims and perpetrators.
2.6 Utilise data from Sussex Police and Brighton & Hove City Council to identify hotspot areas and target resources accordingly. Identify and monitor factors which contribute to anti-social behaviour amongst the anti-social behaviour team client group to aid early identification and the targeting of city-wide resources.
2.7 Continue to develop work with the BCRP and partner agencies including Sussex Police to tackle anti-social behaviour targeted at local businesses and within the night-time economy.
2.8 Where appropriate utilise restorative justice and community resolution with adults and young people committing anti-social behaviour, to assist perpetrators in understanding the harm their behaviour is causing and to provide positive outcomes for victims.
<b>Area of work 3</b>
<b>Work in partnership with agencies across Brighton &amp; Hove to ensure that the use of new tools and powers and recognised good practice is embedded city-wide.</b>
<b>Actions</b>
3.1 In partnership develop city-wide procedures for using new anti-social behaviour tools/powers and including an ongoing and effective dialogue with the Magistrates and County Court users groups.

3.2 Ensure front line staff are trained in the use of the new tools and powers to tackle anti-social behaviour and that partner agencies and third sector organisations are briefed on any changes taking place in the way anti-social behaviour is being tackled within Brighton & Hove.
3.3 Ensure that publicity and the showcasing of work to tackle anti-social behaviour is co-ordinated with partner agencies.
<b>Area of work 4</b>
<b>Ensure community concerns regarding anti-social behaviour are identified and addressed</b>
<b>Actions</b>
4.1 Continue to liaise with communities and communities of interest through Local Action Teams, city-wide forums and community meetings. Including active involvement in a community trigger pilot.
4.2 Feedback key performance monitoring information to local communities and communities of interest.
4.3 Work to strengthen relationships with minority groups and forums working to support minority groups within Brighton & Hove.
4.4 Engage local residents, community groups and third sector organisations in the development of anti-social behaviour services across Brighton & Hove.
4.5 Support individuals and communities to build the skills and capacity to work with agencies, third sector organisations and each other to tackle anti-social behaviour within their communities and to identify and provide support to victims and witnesses.
<b>Area of work 5</b>
<b>Reduce anti-social behaviour by young people and prevent first time entrants into the youth justice system</b>
<b>Actions</b>
5.1 Continue to work with partners such as the Family Intervention Project, Targeted Youth Support Service and Youth Offending Service to tackle anti-social behaviour by young people and prevent first time entrants into the youth justice system.
5.2 Ensure that the CAF process is embedded within anti-social behaviour casework services, including any emerging work arising from work with troubled families or families in multiple deprivation.

## Reducing Reoffending by Integrated Offender Management

**Outcome:** Reoffending by those offenders at high risk of repeat offending is reduced through a co-ordinated approach involving strengthened relationships between statutory and voluntary agencies, and the joint commissioning and delivery of services

**Sub-outcomes:**

- The nature and volume of crimes committed by the most prolific and priority offenders is reduced
- Those at risk of being prolific offenders in the future are prevented from becoming so
- There is less reoffending by offenders who are sent to prison for less than twelve months

### Why this is a priority

Nationally, it is estimated that 50% of crime is committed by 10% of offenders; the most prolific 0.5% commit 10% of crimes. Reducing the number of juvenile and adult repeat offenders and their rate and seriousness of offending is a central government requirement and a priority for Brighton and Hove.

The type of offences committed are often 'acquisitive crimes' (most frequently, burglary, theft and shoplifting) and the proceeds from these crimes often fund illicit drug use. These crimes have a significant impact on actual and perceived levels of safety by individuals and communities (including businesses). Reductions from successful actions to both prevent and reduce high rates of offending by prolific offenders not only brings about changes in the behaviour and drug misuse and improved life opportunities for individual perpetrators, but also brings significant benefits to communities in Brighton and Hove.

The Prolific and Priority Offender (PPO) scheme will continue to be managed so that the intensity of intervention matches the need of the individual PPO and maximum benefit is derived. Membership on the scheme is under regular review so that the scheme provides the most intensive management for those offenders who require it, increasing the positive impact on crime and local reoffending rates.

#### Main Partners

Reducing Reoffending Board  
Surrey & Sussex Probation Trust  
Sussex Police  
Partnership Community Safety Team  
Youth Offending Service  
Crown Prosecution Service  
Court and Prison Services  
Drug and Alcohol Action Team  
Public Health  
Sussex Partnership NHS Foundation Trust  
NHS Brighton & Hove  
Crime Reduction Initiatives  
Housing Services  
Business Crime Reduction Partnership  
Sussex Criminal Justice Board  
Inspire

## Reducing Reoffending

The PPO scheme has been the foundation for the development of a fully 'Integrated Offender Management' (IOM) approach to the management of those offenders who cause the most 'trouble' in the community. IOM is targeted at offenders who are at high risk of reoffending and whose needs profile justifies targeted interventions by a range of agencies with the purpose of reducing reoffending. These include those targeted from the following groups:

- Adult male and female prisoners who have been sentenced to less than 12 months custody and who sign an 'offender compact' accepting supervision for a period of up to six months post release
- Offenders aged 18-25 years (including those on Young Offenders Institution Licence)
- Women Offenders
- Other offenders who meet agreed targeting criteria. These include offenders presenting with one or more of the following factors: drug misuse; alcohol misuse; prolifically arrested; frequently breached.

There are five key principles of IOM. These are:

- All partner agencies tackling offenders together
- Delivering a local response to local problems
- Offenders facing up to their responsibilities or facing the consequences
- Making better use of existing programmes and governance
- All offenders at high risk of causing serious harm\* and/or reoffending are in within the scope of IOM.

Every offender who becomes an ex-offender means safer streets and fewer victims. Turning people away from crime means less pressure on the resources of the criminal justice system and its delivery partners. Offenders who stop reoffending get the opportunity to repay their debt to society and improve their own life chances as well as those of their children and families.

Repeat offenders are often some of the most socially excluded in society. They will typically have chronic and complex health and social problems, eg. substance misuse, mental health needs, homelessness, unemployment, finance and debt. The Safe in the City Partnership (SITCP) aims to tackle these issues in a targeted and informed way and to provide 'pathways' out of offending, breaking the inter-generational cycle of crime and associated family breakdown. By engaging with offenders in order to punish, help, change and control the SITCP provide them with an opportunity for successful reintegration in the community. In this way the SITCP seek to reduce reoffending and the harm this causes to their victims, their families and residents in the Brighton and Hove area.

Surrey & Sussex Probation Trust collects data on the profile and needs of offenders in Brighton and Hove. Of those offenders in the city in contact with the Probation Trust in 2009/10, 64% demonstrated needs around their thinking behaviour and 60% had needs around education, training and employment. 60% of offenders also had alcohol needs. However for the most high risk offenders drugs misuse was more of an issue than

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\*There are separate governance arrangements for serious high risk offenders under the auspices of Multi Agency Public Protection Arrangements (MAPPA)

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

alcohol. Overall, needs were greater for Brighton and Hove offenders than for those across the rest of Sussex. In 2012-13 a full 'intelligent' commissioning exercise will be completed on IOM to inform the direction of future investment in services.

The Policing and Crime Act 2009 formalised the requirements for Community Safety Partnerships to have statutory responsibility to develop and implement a strategy to reduce reoffending, although the Brighton & Hove Community Safety Partnership's (SITCP's) work in this area was well established before the legislation came into force.

### Current context

In December 2010 The Ministry of Justice published a Green Paper on Rehabilitation and Sentencing Reform (*Breaking the Cycle*). The key points from the Green Paper include:

- Criminals should face robust and demanding punishments, with local communities directly benefiting from the hard work of offenders.
- Reforms must result in a better deal for victims, with more offenders making financial reparation.
- There must be rehabilitation of criminals to reduce reoffending in order to protect the public and reduce the number of victims.
- Those intervening with offenders should be paid by results.
- Tackling offending by young people is crucial to stop them becoming the career criminals of tomorrow.
- Community Safety Partnerships, local people, voluntary and community sector all have a role to play in criminal justice.

In March 2012 the government published consultative documents in two key areas of justice reform. These are '*Punishment and Reform: Effective Community Sentences*' and '*Punishment and Reform: Effective Probation Services*'. Sentence reform includes proposals that every community order includes a punitive element. Reform of probation includes proposals to extend competition of offender services.

The election of the Sussex Police and Crime Commissioner (PCC) in November 2012 will transform the commissioning of a wide range of community safety and criminal justice interventions. The PCC will produce a 5 year Police and Crime plan. There will be a period of transition as we move from Police Authorities to Police and Crime Panels. The latter will scrutinise the work of the PCC. The PCC will set the budget for Sussex Police and determine the precept. PCCs will be able to use a percentage of their budget for wider community safety activities. The IOM needs assessment will be used to inform the PCC's future commissioning decisions. We will work with our colleagues in IOM schemes in East and West Sussex to ensure that this work is understood by the PCC and that wherever possible we collaborate on initiatives to improve our efficiency and outcomes. A Sussex IOM Steering Group has been established by the Sussex Criminal Justice Board and will assist this process.

The Health and Social Care Bill received parliamentary assent in March 2012. Locally GP led clinical commissioning groups have been created and will assume most of the commissioning responsibilities previously held by Primary Care Trusts (PCTs). The public health aspects of PCTs will be undertaken nationally by a National Commissioning Board and by Brighton & Hove City Council through the creation of a Health and Wellbeing Boards. Our local reducing re-offending strategy will include arrangements for the exchange of information with the Health and Wellbeing Board and Clinical Commissioning Groups on offender needs as it remains our priority to link



resource allocation of health and social care to local re-offending levels. Information about offenders gained from OASys and other offender related data will be fed into the Joint Strategic Needs Assessment. Our IOM Intelligent Commissioning will assist with this process.

Information exchange between the Health and Wellbeing Board, Clinical Commissioning Groups and the Police and Crime Commissioner must be a key priority for the future in order to link resource allocation of health and social care to reoffending levels locally.

### Where next?

The Integrated Offender Management team is now established at its delivery site in SSPT Probation Office in Grand Parade Brighton. The team benefits from being multi-agency and co-located for all or part of each week. The advantages of this approach are:-

- the opportunities it gives as a forum for multi-agency communication;
- adoption of an investigative approach to information sharing;
- the shared ownership of processes;
- a shared investment in outcomes;
- the effective matching of offenders with resources to maximise the impact of interventions and networking across all sectors to promote role clarity and inter-agency understanding.

The Safe in the City Partnership will extend the principles attached to integrated working by establishing a Safe in the City Delivery Unit in North Street Brighton. This will bring together Neighbourhood Policing Teams and the Partnership Community Safety Team. The anticipated radical changes to the delivery of public services provides us with opportunities for greater collaboration to improve outcomes for both citizens and offenders. The key opportunities identified for the next twelve months are:

- Intelligent Commissioning of Integrated Offender Management
- The introduction of integrated mental health, substance misuse and learning disability assessments at the Brighton Custody Suite and Magistrates Court and the development of pathways for associated interventions
- Restorative approaches to increase victim satisfaction and deal more effectively with perpetrators
- Tackling intergenerational crime in partnership with the Troubled Families Programme
- Adopting the 'recovery approach' in working with drug and alcohol misusers
- Increased community engagement.

### Links to other priority areas

Considerations of crime and disorder are at the heart of decision making across all local authority functions. Work to prevent offending and reoffending integrates with most other areas of this Strategy. The key areas are:- alcohol misuse, drugs misuse; anti-social behaviour and youth crime.

### Implications for equalities and sustainability

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High risk offenders can be some of the most socially excluded members of our community, and suffer from multiple disadvantages around health and wellbeing, finance, accommodation etc. The work in the following action plan seeks to support offenders to overcome these problems. Preventing young people from entering the criminal justice system and concentrating resources on those young people and adults who are committing high numbers of crimes has the potential to divert them from offending, improve their life opportunities and enhance the quality of life for residents and visitors in the city.

### Parallel plans

<ul style="list-style-type: none"><li>• SSPT Brighton &amp; Hove Local Delivery Unit Plan</li><li>• Children and Young Peoples Action Plan</li><li>• Alcohol Action Plans</li><li>• Drugs Misuse Action Plan</li><li>• Sussex Policing Plan</li></ul>	<ul style="list-style-type: none"><li>• Sussex Criminal Justice Board Strategic Plan</li><li>• Sussex Partnership Trust Dual Diagnosis Strategy</li><li>• Suicide Prevention Action Plan</li><li>• Anti Social Behaviour Action Plan</li><li>• FIP Business Plan</li></ul>
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### Measures of success

- Adult proven reoffending rate (based on 12 month rolling cohort)
- Reoffending by PPOs (previously NI30) – number of re-offences from those in cohort over 12 months
- Youth proven reoffending rate (based on 12 month rolling cohort)
- Successful completion of statutory offenders
- Successful engagement of non-statutory offenders
- Accommodation status at termination of order/licence
- In employment, training or education at termination of order/licence

Reducing Reoffending Action Plan
Area of work 1
Set a strategy for the development of Integrated Offender Management
Actions
1.1 Consider the findings from Sussex Universities comparative study between Kent Probation Trust and Surrey & Sussex Probation Trust (SSPT) to better understand the NI18 measure in respect of adult re-offending and act on the recommendations as agreed by the Reducing Reoffending Board.
1.2 Consider the findings of Sheffield Hallam University research and evaluation project on Integrated Offender Management provision across Sussex and implement the agreed recommendations.
1.3 Develop the stakeholder management and communication plan prepared by the Sussex Health and Criminal Justice Liaison and Diversion Steering Group.



1.4 Further develop the strategic and operational links between Brighton IOM Team and HMP Lewes Offender Management Unit and HMP Bronzefield Resettlement Unit IOM teams.
1.5. Explore options for a Payment by Results pilot in conjunction with the 'Troubled Families' initiative.
1.6 Undertake an IOM needs assessment and draw up an IOM Commissioning Strategy.
1.7 Review the INSPIRE women's project.
<b>Area of work 2</b>
<b>Pathways Development: Accommodation – Enable offenders to access and maintain suitable accommodation</b>
<b>Actions</b>
2.1 Consider the findings of the Sheffield Hallam University evaluation of Prevention of Accommodation Loss (POAL) scheme in HMP Lewes and implement the agreed. Recommendations.
2.2 Monitor and evaluate the contribution of providers to accessing and supporting offenders into accommodation:- Brighton Housing Trust; Sussex Pathways; POAL.
<b>Area of work 3</b>
<b>Pathways Development: Health – The health and well-being of offenders is improved and maintained</b>
<b>Actions</b>
3.1 Introduce health trainers into the Integrated Offender Management Team and monitor agreed outcomes.
3.2 Work in partnership with Sussex Police, Sussex Partnership NHS Trust, HMCTS to deliver on the objectives of the Sussex Criminal Justice Health Liaison and Diversion Scheme.
3.3 Develop pathways into primary care for offenders with mental health needs.
3.4 Commissioners to work in partnership with local and regional teams to ensure that people with learning disabilities in the criminal justice system have access to a full range of healthcare provision in line with legislation, policy and best practice, eg. Positive Practice, Positive Outcome 2011.
3.5 Increase confidence and skills amongst staff/frontline workers/practitioners to work with offenders with identified needs in the following areas: learning disability ;autism; personality disorder.
<b>Area of work 4</b>
<b>Pathways Development: Drug and alcohol misuse – Offenders are assessed and supported to recover from drug and alcohol problems</b>
<b>Actions</b>
4.1 Implement “test on arrest’ in Hollingbury Police Custody Suite from April 2012.
4.2 Check progress on the continuity of care for female prisoners leaving HMP Bronzefield and returning to Sussex.
4.3 Review the delivery of substance misuse programmes to ensure they focus on recovery and reintegration.

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<b>Area of work 5</b>
<b>Pathways Development: A Think Family approach is adopted by individuals working with offenders and services are mapped and aligned to ensure that gaps and duplication is eliminated wherever possible</b>
<b>Actions</b>
5.1 Monitor and review the 'postcard' scheme at Brighton Magistrates through which families may be signposted to local Children's Centre services, and offer a consent-based referral for one to one support for partners/families.
5.2 Contribute to the development, implementation and oversight of the 'Problem Families' programme.
<b>Area of work 6</b>
<b>Pathways Development: Support the development of a productive, stable, offence-free lifestyle with non-offending associates</b>
<b>Actions</b>
6.1 Provide mentoring services to offenders who are sentenced to less than 12 months and are subject to a compact upon release from prison.
6.2 Support offenders into education, employment or training.
6.3 Explore the extent of overlapping services via sample case information and service mapping.
6.4 Pilot an intervention with male offenders in partnership with 'abandofbrothers' focusing on mentoring and manhood.
6.5 Work in Partnership with East Sussex Fire and Rescue Service to develop programmes for intervention with offenders from the IOM cohort.

## Children, Young People and Families

**Outcome:** A city where teenage years are safe and rewarding, and where young people are supported to achieve their full potential.

### Sub-outcomes:

- Family and community stability is improved through early intervention services that enable parents, carers and young people to develop their relationships and behave in a responsible way.
- The resilience of young people, especially those who are vulnerable or at risk, is improved through advice and targeted early intervention services that increase their confidence, self-esteem and motivation, and also their ability to communicate and deal with conflict, adversity and the challenges of adult life.
- Young people have the opportunity to be active citizens, participate in community activities and shape the services that affect their lives so that values, expectations and responsibilities are shared and understood.
- Young people are able to enjoy their leisure time, using the opportunities on offer through open access youth provision and cultural, sports and other positive activities across the city, so that they are inspired and challenged.
- The harm caused to young people from misuse substances or involvement in crime and/or antisocial behaviour is reduced.

### Why this is a priority

Brighton & Hove values its young people. The city's strategies aim to create a safe environment to support young people to be successful learners, confident individuals and help them navigate the challenges they may encounter whilst making a successful transition into adulthood. The vast majority of young people in Brighton & Hove make a valuable contribution to their communities and to the city as a whole. Young people are the future community and city leaders.

In Brighton and Hove there are 55,100 children and young people aged 0-19 of which a third (18,000) are aged 13-18. The 2012 City, Equalities and Neighbourhood Profiles analysis estimates that around 4,320 (31%) of this 13-18 cohort, are at risk of poor outcomes due to substance misuse issues, an offending background, being a young carer, involvement with social care teams, teenage pregnancy, living in a deprived area or being not in Education, Employment or Training (NEET) (Aspire database).

The proportions of young people who are involved in different specialist services are small but significant:

- In 2011/12, 270 young people aged 11-17 were either First Time Entrants to the Criminal Justice System or repeat offenders over a 12 month period, a reduction from 400 in 2010/11

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- In 2011/12, a marginal projected reduction of 177 (1%) young people under 18 received substance misuse interventions compared with 170 (less than 1%) in 2010/11
- As of December 2011, 514 (3%) young people were either identified as having an initial assessment, being a Child in Need (CIN), being on a Child Protection Plan (CPP) or being Looked After in Care (LAC).

National evidence confirms that growing up in poverty, within intergenerational family unemployment, or being affected by social exclusion, are often the causal factors behind young people's behaviour. It can often be a young person's involvement in anti-social behaviour (ASB), crime or misuse of substances that brings these conditions to the attention of practitioners who can provide and support change.

### The local picture

Local intelligence, findings from the Intelligent Commissioning Alcohol Pilot Needs Assessment, Child Poverty Joint Strategic Needs Assessment (JSNA), Substance Misuse Needs Assessment, the needs assessment for the Services for Young People Joint Commissioning Strategy 2012-15 and the 2010/11 and 2011/12 performance reports of our specialist services show that:

- Brighton & Hove contains areas of significant deprivation and low ranking scores in the Child Well-being Index. In general these areas align to those in which youth offenders or young people within the Ru-ok substance misuse treatment services live.
- The young people involved in specialist services have a cluster of complex or multiple problems which include a combination of poor mental health, substance misuse, low or no educational attainment, homelessness, poverty, or that they are teenage parents and/or have experienced neglect or abuse and have had previous or current social services involvement.
- Young people's exposure to alcohol is above the levels recommended by the Department of Health who advise that no-one under 15 should have alcohol. In the 2011 Safe and Well School Survey (SAWSS Survey) 82% of young people age 14-16 reported that had tried alcohol and 37% had a drink in the last week. Of those who drink, 18% said they often drink to get drunk and 18% said they drink to get drunk every time. This is a reduction from the 2010 survey where 85% confirmed they had tried an alcoholic drink and 49% has a drink within the last week, although levels remain above national recommendations.
- In the same survey (SAWSS 2011), 25% of the young people said they had taken drugs that were not prescribed. Of these, 82% had used cannabis and of these 26% use cannabis most weeks (130 young people out of a sample of 500). This is a slight increase from the SAWSS 2010, survey, where 23% of the young people had taken drugs that were not prescribed and 26% had taken cannabis most weeks.
- Alcohol remains easily affordable and accessible and the concern now is that young people are drinking at homes and with parental / relative's awareness. In the SAWSS 2010 survey, 49% of the young people aged 14-16 drank at home, 39% drank at a friend's house, 34% drank at a party and 10% drank at a relative's house. In the 2011 SAWSS Survey, this question was changed to show who the young people were drinking with. For example, of those drinking at home, 39% drank with a relative and 10% drank on their own. Of those drinking at a friend's

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house 69% drank with a friend their own age and of those drinking at a relative's house, 31% drank with a relative. 67% of those drinking at a party drank with friends their own age.

- During the school year 2010/11 (September 2010 - July 2011) there were 52 smoking, drugs and alcohol fixed term exclusions with no permanent exclusions.
- There were 113 young people in Ru-ok, the Young People's Substance Misuse Treatment Service, from April to December in 2011, a slight drop from the same period in 2010 which was 127. Between October and December 2011, 42% used cannabis and 36% used alcohol as their main drug. The impact of this service showed that 84% of young people left treatment in a planned way and 28% of these young people were referred on to other services for on-going support and 29% referred back to original referrer. At the same time, there has been a parallel increase in the average length of time in treatment. So although there have been slightly lower numbers entering treatment, they have had more complex needs. These young people are more likely to be NEET (not in education, employment or training) and leave school without qualifications
- A national report '*Right time, right place: alcohol-harm reduction strategies with children and young people*', indicates that A&E attendances nationally have increased over recent years. Locally in 2011/12, 216 people attended A&E with drug/alcohol related incidents and were offered support, a slight decrease from 2010/11 where 223 young people attended A&E. Of the 2011/12 cohort, 33 received 'tier 2' support and 14 were offered specialist treatment, while in the previous year, 28 received 'tier 2' support and 12 received specialist treatment. So whilst the national picture appears to be increased, locally the figures have remained fairly static over this two year period.
- Between 2007/8 and 2010/11 the number of First Time Entrants (FTE) has reduced by 66% (from 498 to 170). Provisional data for 2011/12 anticipates roughly a further 50% reduction compared to the 2010/11 with around 90 FTEs. This is largely attributable to effective working relationships between the Youth Offending Service, Youth Service and the police. Of the crimes committed by children and young people under the age of 18, about three-quarters were committed by males. Theft is the most commonly committed type of offence which accounts for 25% of offences in 2011, with violence against the person the next prevalent (22%). 'Youth on youth' crime most frequently involves violence. In 2011/12, the anticipated number of custodial sentences is 13, a reduction on the previous year and 5% of all sentences. A measure of re-offending is now produced quarterly by the Ministry of Justice. The most recent statistical release (up to March 2010) shows that Brighton & Hove performs well regarding the proportion of young people re-offending, 30%, and the proportion of the young people population in the youth justice system. However, Brighton & Hove has a high average number of re-offences per re-offender at 3.7 offences per person compared to the national average of 2.7 offences, ranking poorly on this measure compared with other youth offending services in the country.
- The Youth Crime Prevention Team has reached nearly 600 young people since 2008, and the impact for 450 young people who have received a 1-1 intervention has been consistently monitored over the last 4 yrs. During 2010/11, 84% of young people who were referred as non FTEs did not go into the youth justice system, and 76% of the young people who had been referred as FTEs have not re-offended. The young people in cohort 2011/12 will be tracked for their re-offending rate. 52

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young people have been screened for substance misuse, 30 young people have received a CRI Drug Awareness intervention, 29 young people completed the sexual health screening tool and over 100 young people have taken part in the Positive Futures Programme of diversionary activities since October 2011.

### Current context

The UK is one of the world's most developed economies but nearly 4 million children are living in poverty, moving children and young people away from living in poverty is a priority. The Department of Health, Home Office and Ministry of Justice are encouraging a joint response locally to enhance the opportunities across police, local authorities, health and probation to work together to improve outcomes and use resources more effectively to reduce substance use and involvement in crime (including payment by results) and this is reflected in the local work described below.

#### **Education and personal, social and health education (PSHE)**

All schools (with the exception of the Academies) have Healthy Schools Status. However, there is local agreement that the quality of teaching and learning in drugs, alcohol and tobacco needs to be improved as do the systems for identifying vulnerable young people for the targeted prevention programmes. As a result, during 2011/12 a core programme of quality drug and alcohol education for Years 9 and 10 was agreed across all secondary schools, ACE, Patcham House, the Cedar Centre and 4 engagement programmes and its implementation has begun. As part of this programme, students who don't receive 50% of this program or who are identified as vulnerable are referred to the Reflect Group Work Program delivered by the council's Youth Service for targeted support.

There are some key health promotion messages and information to support the delivery of effective PSHE in schools for young people and families. Schools have also agreed to deliver every other year sessions directly to parents called '*Talking to your teens about...drugs and alcohol*'. All schools work jointly with the Healthy Schools Team to develop and deliver anti-bullying programmes, particularly focusing on reducing bullying which is motivated by racist/religious prejudice or homophobia/transphobia.

#### **Substance Use**

Local intelligence shows inconsistency between schools' policies on responses to the discovery of substances on school sites. Schools determine their own drug and alcohol policies, but it is a good time to explore with schools a city-wide policy on this as part of the work of the Behaviour Partnership.

Sustaining the effective delivery of treatment services is a priority. A cost benefit analysis report for the Department for Education found that the immediate and long-term benefits of specialist substance misuse treatment for young people are likely to significantly outweigh the cost of providing the treatment. In particular, it estimated a benefit of between £4.66-£8.38 for every £1 spent on young people's drug and alcohol treatment.

#### **Targeted Youth Support**

Since 2008, the Targeted Youth Support Service Crime Prevention Team has received referrals for young people raised for crime and anti-social behaviour (ASB) concerns. Young people are identified through the six Early Intervention Groups which have been established to cover local communities, and areas of ASB concern in Brighton and Hove. These partnerships include police, education services, housing, the Partnership Community Safety Team (including ASB Team and Family Intervention Project), youth services, and social care. This partnership has been effective in identifying young people at risk of becoming 'First Time Entrants', agreeing actions to address ASB where



appropriate and monitoring their offending behaviour. Early intervention programmes are agreed to address individual risk factors and reduce offending behaviour.

The Youth Crime Prevention Team operates on 3 levels: personal, family and community. Youth Crime Prevention workers focus the interventions on the individual needs of the young person (offending behaviour programmes, diversionary activities, Restorative Justice, ABCs and ABC plus), their family (Parenting Programmes, Break for Change, CAF/TAF (Common Assessment Framework/Team Around the Family), and Parenting Contracts/Orders), and the wider Community (Restorative Justice and the Positive Futures Programme).

To support the city's Youth Justice Plan, the commissioners and providers will undertake a Service Commissioning Review of the Youth Offending Service and the Youth Crime Prevention agenda.

### **Youth Offending**

The police and YOS are working together to develop a better aligned partnership approach to 'Deter Young Offenders', ie. to target those young people who are at highest risk of re-offending. Improved intelligence sharing on these high risk young offenders has led to joint planning and delivery around vulnerability and public safety as well as re-offending.

There has been an important culture change in the police response to low level crime through the introduction of Community Resolution. This disposal is victim-focused and restorative and takes place outside of court so the young person is diverted from receiving a criminal conviction. Community Resolution activities involve an apology that may take the form of a letter, a mediated meeting or even repairing damage which helps the young person to increase their own community and personal responsibility. This intervention is firmly embedded as a suitable diversionary outcome and has impacted positively on reducing the number of young people entering the youth justice system.

Involvement in substance misuse, crime or anti-social behaviour can cause physical, psychological and or social harm to the young people themselves, as well as to individuals, families and communities. It is also a negative cost to our city through the costs attached to police call outs, enforcement actions and implementing statutory social care responses. The young person's difficulties can spiral as their behaviours are often linked with criminal activity to fund illicit substance use. There is strong evidence from national studies that building resilience and increasing protective factors for young people and families reduces crime and substance misuse.

These factors and approached will be covered by the Services Review described above.

### **Sexual assault and sexual exploitation**

Drug facilitated sexual assault, including rapes in which drugs are mixed with alcohol, is a significant problem as confirmed by the Advisory Council on the Misuse of Drugs. Sexual assault and sexual exploitation remain a priority for the city and there is now an

#### **Main Partners**

BHCC Commissioning teams  
Public Health Team  
Children & Families Delivery Unit  
Health Promotion  
Police  
Anti-Social Behaviour Team  
B & H City Council Housing  
Temporary Accommodation Team  
Education  
Healthy Schools  
Job Centre Plus  
Substance Misuse Services  
CAMHS and Adult Mental Health Service  
Probation  
Various community and voluntary sector providers  
Residents and communities  
Young people and their families / carers

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established multi-agency steering group for sexual exploitation currently working with Sussex Central YMCA. Sussex Police also lead the work to deal with serious sexual assaults with the CPS supporting and commissioning the development of local support services for victims of sexual assault.

### **Families**

National reports confirm that parental or guardian problematic drug use causes serious harm to children and young people at every age. In Brighton and Hove, the complex needs of families are addressed by a range of 'tier 3' services including social work, Functional Family Therapy (FFT), Family Intervention Project (FIP) and the Parents Of Children At Risk project (POCAR). The needs of families will often include a complex mixture of domestic violence, substance misuse, poor parenting, mental health issues, adult learning difficulty, worklessness, poverty, child neglect, and behavioural difficulties. Often a family member will be in prison or hospitalised for mental health issues for a period of a young person's life. Some children or young people growing up within these families will meet safeguarding thresholds, and are therefore subject to formal children in need, child protection plans or care proceedings. Some young people themselves are likely to become involved in offending or misusing substances.

Local safeguarding information shows a steep increase in past years in the numbers of children on a Child Protection Plan. However, more recently, the number of children subject of a child protection plan has fallen from a peak of 440 in March 2011, to 335 in February 2012, a 24% decrease, with service managers attributing this decrease to Children in Need Plans being seen as a more robust option. Domestic Violence/Abuse and Physical Care/Neglect issues were the most frequent underlying causes for the plans.

Local intelligence from practitioners and service user groups suggest that families in fact delay seeking treatment for their substance use because of the fear attached to social work intervention. A proactive response to engage families where the risks are potentially high for the children has been implemented with the work at Oasis and the young carer's project. Here, support is provided directly to the children of women in treatment. There is also a multi-agency response to reduce offending linked to Integrated Offender Management (IOM) for families of prisoners, which include family days out and family support in children centres and the community.

National evidence confirms that family-based approaches implemented in line with the family CAF improve family stability and functioning. There are a number of successful evidence based family interventions available in the city. The FIP project works with families engaged in ASB, children and young people at high risk of offending, women offenders and children entering or at risk of entering the care system. FFT provides intensive family support to reduce offending, ASB and prevent children coming into care. POCAR is a joint partnership approach to working with families where the adult is in substance misuse treatment and the children are involved with social care teams. These projects are consistently achieving positive outcomes for the families with specific reductions in children entering care, and in the parent's involvement in crime and substance misuse. The Children's Services Value for Money (VfM) project is focusing on prevention and strengthening processes in respect of the number of Looked After Children needing high cost and/or long-term interventions. The Prevention workstream's objective is to manage preventative services effectively in order to reduce referrals to social work and the number of Looked after Children. A robust VfM action plan is in place which includes a multi-agency response across the social work, school nursing, health visiting services and youth services to strengthen the CAF process and to manage cases that redirected at the entry and exit points from the social work to community services. In 2010/11 the Prevention workstream exceeded its savings target



by 199% and saved the council £740k and in 2011/12 it is projected to exceed its target by 137% equating to savings of £1.35 million.

Break4Change is a Brighton & Hove multi-agency city-wide programme for families where young people are abusive towards their parent(s)/carer(s), eg. hitting, name calling, making threats, stealing money or damaging possessions in the home. The project focuses on changing the values, beliefs and actions of participants by; improving internal control, offering clear alternative strategies, increasing critical reasoning and enhancing empathy. The programme is currently undergoing an evaluation in order to become a fully accredited youth programme.

### Where next?

Joint commissioning and partnership working between Brighton & Hove City Council, health, police, the Safe in the City Partnership and Community Voluntary Sector is successfully improving the outcomes for children and young people through reducing crime and substance use amongst young people and families.

During 2012/13, there will be two priorities

- Completion of the Service Review of the Youth Offending Service and Youth Crime Prevention agenda with recommendations implemented via the Youth Justice Plan
- Implementation of the Services for Young People: Joint Commissioning Plan 2012-15.

### Links to other priority areas

The work described here around young people and families will also have an impact on safeguarding children and young people and domestic violence within families.

### Implications for equalities and sustainability

Young people and their families who misuse substances and need treatment or who become involved in crime or ASB are often some of the most socially excluded members of our community and suffer from multiple disadvantages including employment, health, finance and accommodation. The work in the following action plan seeks to support young people and their families to overcome these problems.

Preventing young people from entering the criminal justice system or misusing substances and concentrating resources on those young people and adults who are committing high numbers of crimes has the potential to divert them from offending, reduce the impact on their health from misusing substances and improve their life opportunities and enhance the quality of life for residents and visitors in the city.

### Parallel plans

- |   |  |
|---|--|
| • Youth Justice Plan (includes: music mentoring scheme, arrest diversion scheme and partnership work on release from custody. | • Domestic Violence Action Plans   |
| • Services for Young People: Joint Commissioning Strategy 2012-15.  | • Recommendations of the Local Children Safeguarding Board and Review findings |
| • Anti-Social Behaviour Action Plans  | • Schools improvement strategy   |
| • Young People's Substance Misuse Treatment Internal Compact  | • Workability strategy   |
| • 14-19 Partnership (including plans attached to raising the age of   | • Young people's risk and resilience business plan to be developed during      |

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

education).	2012
<ul style="list-style-type: none"> <li>Family Intervention Project Action Plan</li> <li>Parents of Children at Risk (POCAR)</li> <li>Child and Adolescent Mental Health Services (CAMHS) Strategy</li> <li>Healthy schools work in secondary schools</li> </ul>	<ul style="list-style-type: none"> <li>Joint working on parental substance misuse and its impact on families.</li> <li>Alcohol Strategy and Action Plan</li> </ul>

### Key performance indicators

- Number of children/young people entering the care system
- The numbers of first time entrants to the criminal justice system
- The percentage of YOT offenders who re-offend in a 12 month period
- The number of young people within the criminal justice system receiving a conviction in court who are sentenced to custody
- Number of Key Stage 4 school students reporting that had 'ever taken drugs that were not prescribed for you or available at a chemist'.
- Planned exits from substance misuse treatment as a proportion of the total treatment population for under 18s
- Number of vulnerable young people screened for substance misuse across youth services, hostels, social care and CAMHs
- EET amongst young people engaged in YOT / substance misuse treatment
- Youth Crime prevention compared to general youth population.

### Children and Young People Action Plan

This action plan is the commissioning business plan and performance will be reported against each area of work using a score card

#### Area of work 1

#### Implementation of a city-wide Services For Young People Joint Commissioning Strategy

##### Actions

1.1 Jointly commission services for young people across the council's commissioning teams, the community safety partnership and health to ensure that resources are pooled and targeted effectively via the Youth Joint Commissioning Group.

1.2 Commission youth work and youth provision across the city. Address any issues that arise as part of the review of the Youth Offending and Youth Crime Prevention Services.

1.3 Revise and amend the care pathway across services for young people at risk, improve resilience and increase protective factors.

1.4 Agree and implement a consistent standard and quality of approach across all commissioned / delivered services for young people, attached to participation and engagement.

1.5 Procure services in a fair and transparent way.

#### Area of work 2

#### Reduce the harm caused to young people by substances use

##### Actions

## Children, Young People and Families

2.1 Continue to deliver an effective treatment service that ensures young people have left treatment in a planned way when their treatment is completed.
2.2 Improve resilience amongst young people, especially those who are vulnerable or at risk due to substance use.
2.3 Identify service and information gaps and issues regarding dual diagnosis in conjunction with commissioner for mental health and seek to address these.
2.4 Consider the options available for developing an effective substance misuse treatment intervention for young people aged 18-25 where the primary substances of choice are alcohol and cannabis, and consider whether there is a need to develop a Transitions Service
<b>Area of work 3</b>
<b>Improve the outcomes for young people involved in crime or ASB</b>
<b>Actions</b>
3.1 Implement the Youth Justice Plan 2011/12
3.2 Conduct a service needs assessment for Youth Offending and Youth Crime Prevention Services
3.3 Implement a transformational plan through the Youth Justice Plan and include in the 2012/13 plan
<b>Area of work 4</b>
<b>Improve formal and informal education for young people attached to substance use and sexual health (as part of implementing the Teenage Pregnancy and Substance Misuse Action Plan)</b>
<b>Actions</b>
4.1 The Healthy Schools programme to support schools to deliver a core programme of quality drug and alcohol education and to monitor attendance and referral to targeted support of the PSHE programme across all secondary schools, ACE, Patcham House, Cedar Centre and 4 engagement programmes for Year 9 and 10
4.2 Healthy Schools to support schools to deliver <i>'Talking to your teens about...drugs and alcohol'</i> sessions every two years
4.3 Healthy Schools to revise and disseminate guidance on dealing with drug related incidents and searching in schools.
4.4 All schools to complete a Safe and Well at School Survey annually
4.5 Transfer this core program delivery approach to the provision of youth services in the community, whether contracted with or delivered by the council.
<b>Area of work 5</b>
<b>To reduce the harm caused to families where substance misuse is an issue</b>
<b>Actions</b>
5.1 All delivery of secondary schools Triple P Parenting program to deliver a model on talking to young people and sexual health and substance misuse.
5.2 Implement the VFM agenda across children services.
5.3 Review and implement a joint working protocol across children's and adult services for working with families where substance misuse is an issue. Support year one with training across services and review learning via action learning sets aimed at managers.

## Children, Young People and Families (Family Intervention Project)

**Outcome:** Reducing harm in neighbourhoods whilst improving outcomes for families with complex/acute needs

**Sub-outcomes:**

- There is improved quality of life in neighbourhoods that have experienced the impact of persistent anti-social behaviour
- The risk factors associated with young people's offending are reduced
- Families stay together (where safe to do so)
- There is improved health (mental, physical and sexual)

### Why this is a priority

There are a few families in the city that cause a disproportionate amount of disruption and damage within their neighbourhoods which can cause significant harm to individuals. These families have a complex range of issues themselves that can lead to them becoming socially excluded or homeless. There is increased risk of the children offending, becoming highly vulnerable, being placed on child protection plans or at times being taken into care by the local authority. Apart from the emotional and, at times, physical harm this behaviour has on individuals, it is hugely costly to our city – police call outs, enforcement actions, statutory social care interventions are all highly expensive.

The Family Intervention Project (FIP) works with families that have complex/acute needs often reflected in the prevalence of domestic violence, substance misuse, poor parenting, mental health issues, adult learning difficulty, worklessness, poverty, child neglect, poor school attendance and behavioural difficulties.. Of the 60 referred families accepted by the FIP between Jan 2010 and Dec 2011, 90% (53/60) had had some involvement with children's social services. Within these families, there were 166 children of whom 55.4% were on Child Protection

#### Main Partners

Family Intervention Project Team  
Children & Families Social Care  
Police  
Parenting Team  
Youth Offending Service  
Anti-Social Behaviour Team  
B & H City Council Housing  
Temporary Accommodation Team  
Registered Social Landlords  
Inspire Project  
RISE  
Brighton Women's Centre  
Targeted Youth Support Services  
Education  
Job Centre Plus  
Probation  
Various health agencies  
Adult Social Care

Plans either at referral or at some point during the intervention.<sup>7</sup>

Our evidence-based approach looks at: children, young people and families who are engaging in persistent anti-social behaviour; children/young people at high risk of offending; women offenders; and children entering (or at risk of entering) the care system. This tells us which families to target and demonstrates the cost effectiveness of using the FIP model.

Using a national model (the Family Saving Calculator) for the calculation of cost effectiveness, it is estimated that Brighton and Hove FIP team has saved organisations in the region of £243,000 through intensive work with just two families.

### Current context

Targeted parent and family support continues to play an important part in delivering the Coalition Government's commitment to supporting families with multiple problems. On the 15<sup>th</sup> December 2011 the Prime Minister and Communities Secretary announced plans to radically transform the lives of 120,000 of the country's most 'troubled families' by the end of this Parliament. Almost £450 million has been made available. A new Troubled Families Team based within the Department for Communities and Local Government has been established. Funding has also been provided for a national network of Troubled Family 'trouble-shooters' who will be appointed by local councils.

Complaints of anti-social behaviour are collated and reviewed regularly. The number of ASB complaints against FIP families<sup>8</sup> in the three months prior to their case being closed reduced by 97% compared with the three month period prior to the families' initial referral. Data are now being collated on offending by FIP 10-17 year olds both during the intervention and in the months following the closure of a case and will be reporting in the coming months. FIP work will have contributed to the ongoing drop in the number of first time entrants to the youth justice system (from 171 in 2010/11 to 64 in the period from April to December 2011). 74% of families and 100% of agencies reported that the overall situation for the FIP family had improved as a result of the FIP intervention.

### Where next?

The Government has introduced a Troubled Families programme which is a 'payment by results' model for local partnerships to improve the lives of those families who have long standing problems and which can lead to children repeating the cycle of disadvantage. The families that are expected to be within the target group, are characterised by there being no adult in the family who is working, children not being in school and a family member being involved in crime and/or anti-social behaviour. It is expected too, that other problems will also need to be addressed – domestic violence, mental and physical health problems, isolation, and so on. The way of working that is recommended, recognises the success of the model of interventions pioneered by Family Intervention Projects, and the Community Safety Partnership is therefore fully involved in the scoping and development exercise for the new Troubled Families initiative. The outcome of this will also determine the future positioning of the Family Intervention Project, its vision and the service it delivers.

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<sup>7</sup> The FIP referral process changed during 2011 and it is now FIP policy to accept only referrals from CYPT (with a small number of exceptions). This means that this percentage of children with a CPP will increase over time, although there are still a number of long-standing cases open where there is no child protection element.

<sup>8</sup> For those cases closed during the first six months of 2011/12

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This group will take into consideration the continued successful outcomes achieved by using the FIP model and the evidence of providing 'value for money'.

### Links to other priority areas

FIP is closely linked to a number of priority areas contained in this Community Safety Strategy, for example, targeting families who are engaging in persistent anti-social behaviour requires a close working relationship with the Anti-Social Behaviour/Hate Crime Casework Team. Sharing information and making use of enforcement tools where necessary plays a crucial role in FIP's work with families. In addition, domestic violence is a key issue for those families referred to FIP and for families with children on child protection plans. Alcohol and substance misuse are also an issue for family members, increasing the risk of (re)offending, committing anti-social behaviour and children entering the care system. FIP also have a link with the Casework Team, with family members on occasions being a perpetrator or victim of a hate crime. FIP also targets families where a parent is offending, particularly mothers, where a high percentage of the children of women who enter prison are in care. Finally, FIP targets families where children who are at high risk of offending, and having a family member that is offending increases that risk, and therefore FIP have strong links with priority areas that are linked to crime.

### Implications for equalities and sustainability

Families who are engaging in persistent anti-social or offending behaviour affect the quality of lives of a number of individuals living in the neighbourhoods where these families reside. By working with these families (who themselves have complex/acute needs) intensively, using an evidenced based model, getting to the root causes of the problems not only improves the lives of those individuals affected by their behaviour but improves the outcomes/life chances for all family members engaging in FIP, whilst providing a cost effective way of engaging and supporting families who make the highest demand on services.

Within their work FIP deal with a number of issues (eg. domestic violence, poverty, debt, disability, substance/alcohol misuse, learning difficulties, etc.) and priority has been given to training in order to ensure that workers are well equipped to address these effectively. FIP have undertaken an Equalities Impact Assessment and the identified actions are incorporated within the team's service delivery plan.

### Parallel plans

<ul style="list-style-type: none"><li>• Brighton &amp; Hove Children &amp; Young People's Plan</li><li>• Brighton &amp; Hove Youth Justice Plan</li><li>• Brighton &amp; Hove Parenting Support Strategy</li></ul>	<ul style="list-style-type: none"><li>• Brighton &amp; Hove Housing Strategy</li><li>• Brighton &amp; Hove Turning the Tide Strategy</li></ul>
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### Key performance indicators

NB. The following indicators may change depending on the outcome of the forthcoming work linked to Families with Multiple Disadvantages.

- % of families and referring agencies who feel that the situation with the family has improved as a result of the work of the Family Intervention Project
- Percent change in ASB complaints against FIP families



## Children, Young People and Families (FIP)

- Percentage of children and young people of families entering the care system during the FIP intervention
- Percentage of FIP children and young people who have offended

Family Intervention Project Action Plan	
NB. The following Action Plan may change depending on the outcome of the forthcoming work linked to Families with Multiple Disadvantages.	
Area of work 1	
<b>Effective structures and processes in place that enable staff to confidently deliver FIP interventions within a supportive framework that safeguards them and their clients</b>	
Actions	
1.1	A clear entry and exit point for working with families set up and disseminated to all FIP staff and stakeholders
1.2	Good quality, regular supervision in place along with individual performance reviews
1.3	Staff training needs are identified and addressed (including health & safety, child protection, lone working and personal safety)
1.4	A FIP manager available to FIP Keyworkers during work hours and duty rota set up for evenings (for staff working later)
1.5	Ensure all staff have knowledge of and use the Carelink lone working scheme
1.6	Staff have access to regular peer supervision sessions
1.7	Clear systems in place for recording work with families
1.8	Keep staff up-to-date by holding regularly team meetings to disseminate information and share practice
1.9	Ensure a multi-agency context at strategic and operational level
Area of work 2	
<b>FIP Keyworkers to effectively implement the FIP model for families who have complex/acute needs (and engaging in ASB, at high risk of offending or have children at risk or entering the care system)</b>	
Actions	
2.1	All members of staff to have an excellent working knowledge of the FIP model and demonstrate this within their practice
2.2	FIP staff to work in partnership with the family and collate information from multi-agency sources (including Initial/Core assessments and child protection reports) to inform the assessment of need (using the Family CAF) for the whole family – signed off by the keyworker's line manager
2.3	FIP staff to work alongside the social worker to ensure an holistic, wide-reaching child protection (CP) plan is in place and implemented for the families they are working with
2.4	FIP staff to support the social worker in bringing together a 'Team around the Family' that will help meet the needs of the families worked with
2.5	FIP staff to support the implementation of the CP plan by completing the FIP interventions established in the CP Conference/Review or core groups
2.6	FIP staff to support the social worker in regularly reviewing progress made against targets via the families core group and CP conference reviews

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

2.7 Where FIP families are coming off CP plans, the keyworker will ensure there is an updated Family CAF and plan in place and will support the identified lead professional and team around the family to sustain progress made
2.8 Within FIP staff's casework with families, provide a variety of interventions that will support the CP plan including those identified in area of work 3, 4, 5 & 6
<b>Area of work 3</b>
<b>A varied, evidence based group work programme that meets the needs of families with complex/acute needs</b>
<b>Actions</b>
3.1 Integrate the Living Without Violence (LWV) Programme within FIP, maintaining the two current group work programmes and ensuring it retains its Respect accreditation
3.2 Continue to co-ordinate and support the facilitation and development of the Break for Change (B4C) programme alongside partner agencies
3.3 Continue to work with Brighton Women's Centre to support the co-ordination, facilitation and development of the BOOST programme
3.4 Continue to work with the Parenting Team and Senior Parenting Practitioner to support the co-ordination and facilitation of Triple P (level 4 & 5) programmes
3.5 Continue to work in partnership with education and other agencies to facilitate and develop the ASDAN Boxing Awards for young people disengaged from education
3.6 FIP staff to continue organising Art groups for families during school holidays
3.7 FIP to work with partner agencies to regularly review the needs of families and endeavour to identify gaps in services which in turn will lead to supporting the development/facilitation of additional group work programmes
3.8 Provide training for staff facilitating any group work programme supported by FIP
3.9 Ensure there is adequate supervision/support available to staff facilitating group work programmes supported by FIP
3.10 Ensure there are robust processes in place to record and monitor outcomes of any group work programme supported by FIP and regularly review their cost effectiveness
<b>Area of work 4</b>
<b>Support family members that are perpetrating or affected by domestic violence</b>
<b>Actions</b>
4.1 All FIP staff are at least CAADA trained and further develop skills and knowledge for working with family members around DV, working within the DV National Occupational Standards
4.2 All families are consistently screened for domestic violence both current and historical
4.3 DV risk assessment (DASH) completed and referral made to MARAC where appropriate
4.4 FIP to work closely, seeking advice and joint working where appropriate with RISE, LWV manager and the Independent DV Advisors
<b>Area of work 5</b>
<b>A robust pathway in place for family members working with FIP that are not in education, employment and training</b>
<b>Actions</b>
5.1 The assessment to include identification of family members needs around education, training or employment



## Children, Young People and Families (FIP)

5.2 Where required a plan/pathway back into education, training or employment negotiated with family members, supported by partner agencies
5.3 Further develop links within statutory education, further education programmes, Gateway projects and Job Centre Plus, joint working where appropriate
5.4 With support from parents/carers provide interventions that will support children/young people to address behaviour difficulties within school
5.5 Where required, attend multi-agency meetings at Brighton Aldridge Community Academy (BACA) for high risk pupils
<b>Area of work 6</b>
<b>Improving the health of families working with FIP</b>
<b>Actions</b>
6.1 The assessment to include identification of family members' needs around health, including using agreed screening tools
6.2 Further develop good links with a range of health services and negotiate fast track referral system where appropriate
6.3 Ensure health services are represented on the FIP steering group
6.4 Where necessary/appropriate, FIP staff to provide practical support to family members to enable access to health services
6.5 Work with the FIP Health Trainer to identify and prioritise health related group work programmes (e.g. smoking cessation, health eating, fitness etc)
6.6 FIP staff to support the FIP Health Trainer to develop and facilitate health related group work programmes
6.7 FIP staff to refer appropriately onto specialist health related services
<b>Area of work 7</b>
<b>Ensure the views of family members involved with FIP and stakeholders are heard and findings inform the development of the service</b>
<b>Actions</b>
7.1 Develop a vigorous process that invites families and partner agencies to offer their views of the service they received and seek advice on any areas of development
7.2 Collate views on the service and draw on these to review service delivery
7.3 Ensure all families are aware of the council's complaints procedure
7.4 Continue with the multi-agency FIP steering group where partner agencies and commissioners have an opportunity to offer advice, and guidance, in addition to feedback their views
7.5 Invite two service users to attend the steering group
<b>Area of work 8</b>
<b>Ensure FIP are properly servicing the community's diverse population and that services are accessible to all</b>
<b>Actions</b>
8.1 In addition to data already collected, collect data and monitor family member's sexual orientation, gypsies/travellers and religion/beliefs.
8.1 Collect data and monitor family member's sexual orientation, gypsies/travellers and religion/beliefs.

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8.2 Increase the team's knowledge around race/ethnicity, social power issues, women offenders, gypsies/travellers and religion/beliefs, learning difficulties and mental health issues
8.3 Increase knowledge and confidence in working with family members around diversity issues
8.4 Consistently screen family members for domestic violence and learning difficulties
8.5 Good access to translators
<b>Area of work 9</b>
<b>Preventing evictions due to persistent anti-social behaviour</b>
<b>Actions</b>
9.1 Ring-fenced provision for housing providers commissioning FIP, where families do not have children on CP plans but they are committing persistent ASB, causing disruption/harm to individuals/communities and their tenancy is at risk
9.2 Clear referral route into the service and support housing providers to prioritise referrals
9.3 FIP keyworker to take on the role of Lead Professional, initiate Family CAF process (if not already in place), working in partnership with the family and bring together the agencies that can support the family
9.4 FIP keyworker to take a lead in negotiating a family CAF Plan
9.5 FIP keyworker to work intensively with the family, provide a variety of interventions that will support the Family CAF plan including those identified in area of work 3,4,5 & 6
9.6 FIP staff to review the Family CAF plan regularly
9.7 FIP to ensure close working links with housing providers both strategic and operational
<b>Area of work 10</b>
<b>Provide a service that prevents intensive services such as FIP and children and families social care team being required by supporting the embedding of the Family CAF process in the city</b>
<b>Actions</b>
10.1 Family CAF mentor to be available to provide advice and guidance to any professional carrying out the CAF process.
10.2 Family CAF mentors to provide an enhanced mentoring service in cases that fall below the threshold for social services but have complex aspects of support need. This enhanced mentoring will include sourcing the TAF, chairing initial meetings, liaising with families and assisting in completing the assessment and family plan.
10.3 Family CAF mentoring co-ordinator to work alongside the family CAF team to embed successful practice in community services and agencies by attending team meetings and professional events, and providing team supervisions where applicable.
10.4 Family CAF mentoring co-ordinator to have a role in development and delivery of training provision around the use of the Family CAF.
10.5 A robust recording system to be put in place to evidence successful outcomes within the Family CAF process.
10.6 Family CAF mentoring co-ordinator to co-ordinate use of FIP workers as Family CAF mentors.
10.7 Family CAF mentoring co-ordinator to report to the Family CAF team, and the Value for Money prevention workgroup successes and challenges encountered in Family CAF mentoring delivery.

# Domestic Violence

**Outcome: Residents and communities to be free from domestic violence by increasing survivor safety, holding perpetrators to account, decreasing social tolerance and increasing people's ability to have healthy relationships.**

## Sub-outcomes:

### Prevention

- Increased awareness and knowledge of domestic violence and its impact and a decrease in its tolerance and acceptance
- Increased knowledge and skills of children, young people and adults about forming and sustaining safe, equal and violence-free relationships
- Increased awareness of options and rights to access services by individuals and communities

### Early intervention

- Adults, children & young people feel safe to disclose domestic violence, and are listened to, believed and not judged
- Survivors and perpetrators have improved knowledge of services available to access help when required
- Increased safety of survivors and increased responsibility by perpetrators to manage and reduce the risk they pose

### Provision

- Improved physical safety and freedom from harm for survivors
- Improved emotional safety through improved supportive, violence-free relationships, resilience and self-esteem
- Safe and supportive contact arrangements for survivors and children, post-separation
- Reduced risk posed by perpetrators through timely safeguarding and justice system interventions

### Definition:

The local and national definition of domestic violence, for monitoring purposes is: 'Any incident of threatening behaviour, violence or abuse, [psychological, physical, sexual, financial or emotional], between adults who are or have been intimate partners or family members, regardless of gender or sexuality. This includes issues of concern to Black and minority ethnic (BME) and other communities such as so-called 'honour based violence'<sup>9</sup>, female genital mutilation (FGM)<sup>10</sup> and forced marriage<sup>11</sup>.

<sup>9</sup> Forced marriage affects people from many communities and cultures: Black, minority ethnic and refugee communities; lesbian, gay, bisexual and transgender people; and disabled people. It involves a marriage in which

### Why this is a priority

Domestic violence in the city, as elsewhere, is widespread. It occurs across all communities, irrespective of deprivation, education, age, sexuality, ethnicity or ability. Originating from a sense of entitlement and rooted in patriarchy, the vast majority of domestic violence is experienced by women, and perpetrated by men. A significant minority of men also experience domestic violence; it is experienced by transgender people, and occurs in heterosexual, lesbian, gay and bisexual relationships.

If not prevented, domestic violence often escalates in intensity and severity, and can lead to the victim's death. Nationally, two women a week on average are killed by a current or former male partner. It is the gender of both victim and perpetrator that influences the type of violence used, the associated risk, and severity of harm caused. Additional factors that increase the risk of homicide include the presence of rape, stalking and controlling behaviour; the co-occurrence of child abuse; isolation and barriers to accessing services; separation, and child contact disputes. In 2009/10 in the city, 125 victims were assessed as being at very high-risk of homicide, and in 2010/11 197 referrals were considered at a Multi-Agency Risk Assessment Conference where the victims were assessed as being at high-risk of homicide.

The British Crime Survey 2010/11 found that 7.4% of women and 4.8% of men aged 16-59 reported being a victim of domestic abuse<sup>12</sup> in the last year. If extrapolated to the Brighton & Hove population, this equates to an estimate of 6,200 women and 4,100 men within this age group. However, this estimation does not take into account the pattern of ongoing, repeat violence which often characterises the coercive nature of domestic violence. Research shows that women are much more likely to experience repeat domestic violence than men. It is therefore estimated that over 25,000 women

### Main Partners

Rise

Living Without Violence Programme

Partnership Community Safety Team

Family Intervention Project Team

Sussex Police

Crown Prosecution Service

HM Courts Service

Surrey and Sussex Probation Trust

Brighton & Hove City Council

(Children, Youth and Families Service; Adult Social Care Service; Housing Services)

NHS Brighton & Hove

Drug and Alcohol Action Team

Survivors Network

Inspire Project

Youth Offending Service

Domestic Violence Commissioners Group

Brighton & Hove Domestic Violence Forum

Domestic Violence & Housing Working Group

LGBT DV&A Working Group

Sexual Violence Reference Group

Local Safeguarding Children Board

Local Safeguarding Adults Board

Health & Wellbeing Board

Stronger Communities Partnership

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one or both spouses do not, or cannot, consent to the marriage and duress is involved, which can include physical, psychological, financial, sexual and emotional pressure.

<sup>10</sup> So-called 'honour-based violence', a term applied to different forms of violence, mainly but not exclusively against women, is used to control behaviour within families and communities to protect perceived cultural or religious beliefs and/or 'honour'. The concept of 'honour' is a motive for violence, or a constraining factor preventing victims from leaving the abuse, rather than a specific form of violence. It cuts across all cultures, nationalities, faith groups and communities, and transcends national and international boundaries.

<sup>11</sup> Female genital mutilation (FGM) involves all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. The practice, which is illegal in the UK, has serious health consequences, both at the time when the mutilation is carried out and in later life. The age of mutilation ranges from girls a few days old to adolescence - before marriage - and occasionally on pregnant women and on widows.

<sup>12</sup> includes partner or family non-physical abuse, threats, force, sexual assault or stalking

and nearly 2,000 men living in Brighton & Hove could, at some point in their lives, experience 4 or more repeat incidents of domestic violence as adults. From limited national research, the estimated prevalence for lesbians, gay men, bisexual and trans people is thought to roughly the same as that for the heterosexual population.

In 2010/11, 3,671 domestic violence crimes and incidents were reported to the police in Brighton & Hove, an increase of 312 on 2009/10. Of these, 1,259 were recorded as crimes, and 391 (31%) resulted in a charge. In the same period, there were 341 finalised domestic violence prosecutions, of which 227 (67%) were successful, compared with 71% success rate in 2009/10.

Domestic violence causes significant health problems, including physical injury, self-harm, eating disorders, sexually transmitted infections, attempted suicide, depression, anxiety, and other mental health problems. Women experiencing domestic violence are 15 times more likely to misuse alcohol and 9 times more likely to misuse drugs than non-abused women. In 2010/11 Rise provided services to 1,120 survivors (an increase of 12% on 2009-10), of which 779 were from the Brighton and Hove area. Between April - December 2011, 859 referrals were made to RISE services in Brighton & Hove and support was provided to 835 local survivors; of these, 225 survivors were assessed as high risk of serious harm/homicide. In the same period, RISE domestic violence helpline received 1769 contacts with or on behalf of 529 clients, and a further 617 contacts were made with professionals and members of the public.

Other consequences of domestic violence include poverty, unemployment and homelessness. In 2010/11 358 homeless applications were made due to domestic violence. Domestic violence also impacts on employers and the local economy by limiting victims' ability to access education, training and employment; decreasing the productivity of employees, and increasing absenteeism and staff turnover.

Domestic violence also harms children and young people. Three quarters of children living with domestic violence witness it and half are directly abused. As of March 2011 in Brighton & Hove, 36% of child protection plans identified domestic violence as an underlying cause for having a plan. Teenagers also experience domestic violence in their own relationships, which disproportionately affects girls, and there are links between domestic violence, youth offending and teenage pregnancy.

Domestic violence has a serious and lasting impact on survivors' safety, health, wellbeing and autonomy, and can severely restrict survivors' ability to fully participate in society. In Brighton & Hove, the individual, economic and social cost of domestic violence is estimated to be £132 million per annum.

### Current context

Nationally, reducing and preventing domestic and sexual violence is a government priority with cross-party support. Its prevention is central to agendas on public health; reducing crime and the harm caused by serious violent crime; safeguarding children and adults with support needs; promoting education, learning and skills development; and promoting equality. Government recognises the gendered pattern of violence against women and girls needs to be understood and acknowledged, whilst also recognising that men and boys can be victims of violence and that it can affect whole families. Men also have a key role in challenging violence and helping to change the attitudes and actions of their peers. The vision of the government is for:

*“.....a society in which no woman or girl has to live in fear of violence. To achieve this vision, society needs to **prevent** such violence from happening by challenging the attitudes and behaviours which foster it and intervening early where possible to*

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

*prevent it; **provide** adequate levels of support where violence does occur; work in **partnership** to obtain the best outcome for victims and their families; and take action to **reduce the risk** to women and girls who are victims of these crimes and ensure that perpetrators are brought to justice.” (HM Government, *Call to End Violence Against Women and Girls*, 2010)*

The government’s 2012/13 action plan ‘*Call to End Violence Against Women and Girls: Taking Action – the next chapter*’ sets out the following outcomes:

- Society believes violence against women and girls is unacceptable and is empowered to challenge violent behaviour
- Fewer victims of sexual and domestic violence
- Frontline professionals (like. teachers, doctors, police and prosecutors) are able to identify and deal with violence against women and girls
- Employers recognise and support victims of domestic and sexual violence
- VAWG victims receive good and consistent levels of service
- Statutory agencies and NGOs get the response right the first time
- High quality commissioning and service provision at a local level
- Better support for victims and their families in statutory and voluntary sectors
- Working together to share information and agree practical action
- Improved life chances of victims overseas
- VAWG is an international priority
- Increase confidence of women and girls to access the criminal justice system
- Improve criminal justice outcomes for victims of VAWG, including conviction rates
- Rehabilitate more offenders
- Reduce multiple incidents of violence by using appropriate risk management tools

In Brighton & Hove domestic violence was the subject of one of three ‘intelligent commissioning’ pilots during 2010/11. By working with partners across services and communities, a comprehensive needs analysis, and services and investment mapping, provided a more informed understanding of the needs of residents and local communities, the demand for services, what works, and what needs to change. This informed the development of a domestic violence outcomes framework and joint commissioning strategy.

We have the foundation for delivering a coordinated community response to domestic violence locally: the city has independent domestic violence advocacy and support services for survivors and programmes for perpetrators and their partners; a Multi-Agency Risk Assessment Conference (MARAC) system; and an accredited Specialist Domestic Violence Court Programme, which is a model for effective criminal and civil justice intervention, working in partnership with public, community and voluntary sector services. However, the Needs Assessment found more work needs to be done.

Domestic violence continues to be significantly under-reported locally. It is estimated that only around a quarter of domestic violence is reported to the police, and whilst there are many victims and perpetrators in contact with services other than the justice system, many do not disclose that domestic violence is taking place. Consultation with



survivors locally found that they welcomed and highly valued the support offered by specialist domestic violence services in the city. However, there was room for improvement in the way in which a number of public services identified and responded to their needs and ways needed to be found to increase the confidence that survivors had in these services.

The 2010/11 service mapping found that specialist independent domestic violence services are most effective in meeting survivors' holistic needs, but are unable to meet the increasing demand for their services. At the same time, statutory services do not know the extent to which service users are experiencing or perpetrating domestic violence. Comprehensive systems are not yet in place to effectively identify, record, and respond, particularly if survivors have complex needs or if the abuse involves sexual violence, emotional abuse, forced marriage or female genital mutilation. Few services know if they are successful in increasing survivor and child safety and in holding abusers to account when they work with individuals and families affected by domestic violence.

The investment mapping found that, in contrast to the significant cost of domestic violence to the city, the level of direct investment into prevention, early intervention, and the provision of specialist support services for survivors and perpetrators is relatively low. Money spent across universal and mainstream services is focussed on picking-up the pieces after domestic violence has happened, and responding to very high risk cases at the expense of investment into early intervention and prevention.

The Safe in the City Partnership is taking the lead in ensuring residents and communities are free from domestic violence in future, by prioritising activity focussing on increasing the safety of survivors (adults and children); reducing the risk posed by perpetrators and holding them to account; decreasing social tolerance and approval of domestic violence, and increasing people's abilities to form and sustain healthy, equal, non-violent relationships.

### Where next?

The Domestic Violence Intelligent Commissioning Pilot concluded that from 2011, domestic violence must be seen as 'core business' for city services and partnerships, because preventing domestic violence cannot be left to a single, statutory body or local partnership alone. We need to focus on reinvestment and resource pooling so that prevention and early intervention is prioritised alongside crisis and high-risk responses. During 2011/12, in addition to prioritising the strengthening of specialist independent support services for survivors, the foundations have also been laid to deliver, from 2012, a coordinated work programme on domestic and sexual violence prevention in schools; a multi-agency Domestic Violence Coordinated Community Group programme for children and young people; work to increase the capacity of Black and minority women's groups in the city, and deliver a modular training programme and revise procedures to improve the responses of public services. In 2012 we also aim to roll out the Identification & Referral to Improve Safety (IRIS) early intervention programme with GPs; improve responses to domestic violence amongst Gypsy and Traveller communities; coordinate a publicity strategy; and deliver targeted service improvements across children's services, adult services, housing services and health services.

It is important that future work to address domestic violence in the city is also integrated with strategic and operational responses to sexual violence and other forms of violence against women and girls in accordance with national priorities.

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The Domestic Violence Commissioning Plan will focus on delivering the domestic violence outcomes framework, which includes city-wide strategic outcomes and service-level outcomes across three types of activity (prevention, early intervention and provision of ongoing support), for identified stakeholders (survivors, children and young people, perpetrators, and communities). Together this provides a framework of accountability that focuses on how well services are identifying, responding to and preventing domestic violence, and creating positive change for local people.

### **Links to other priority areas**

In addition to the 'reducing crime and improving safety' priority in the Sustainable Community Strategy, other citywide priorities which are most directly supported by our work in this area are: improving health and wellbeing; strengthening communities and involving people; promoting enterprise and learning; improving housing and affordability, and providing quality advice and information services. Addressing domestic and sexual violence is a priority identified in the local Joint Strategic Needs Assessment 2011; in the Children and Young People's Plan priority to strengthen safeguarding and child protection, early intervention and prevention; and in the city's Housing Strategy priorities to create a healthy city, reduce inequality, improve neighbourhoods, partnership and deliver value for money. Work to address other areas in this Strategy, such as alcohol harm and drug misuse, sexual violence and abuse, anti-social behaviour, hate crime and integrated offender management, will also impact positively on reducing and preventing domestic violence.

### **Implications for equalities and sustainability**

Domestic violence is both a cause and consequence of gender inequality; women and girls are more likely to be victims than men and boys, and young women in particular suffer higher levels of victimisation. It is rooted in patriarchal traditions and supported by sexist, racist, disablist, homophobic, biphobic, transphobic and other discriminatory attitudes, behaviours and systems that maintain and reproduce inequality. Addressing domestic violence effectively through delivery of this action plan is therefore central to the delivery of gender, as well as other equality duties. Domestic violence is also a significant factor in promoting and sustaining health inequalities in the city.

The incidence of domestic violence varies only marginally when analysed by geography, class, age, ability, sexuality, ethnicity and nationality, although the experience of survivors from marginalised or excluded groups is compounded by additional barriers to seeking help. Many services are inaccessible and/or unable to respond effectively to survivors with diverse or complex needs, because of their identity or life experience. Survivors' experiences are compounded by the additional discrimination faced by some groups, particularly women and those from Black, minority and refugee communities, including Gypsy and Traveller communities and amongst women seeking asylum; disabled people; older or younger people; LGBT people; and people with mental health needs or who have problematic substance use. Belonging to one or more of the aforementioned groups makes help-seeking more complex and can reduce the number of services available.

Delivery of the action plan will also address sustainability issues by contributing to building sustainable communities; managing the environment and resources; contributing to the health and wellbeing of local residents; promoting a more sustainable local economy, social equity and opportunity for local residents.



## Parallel plans

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|--|---|
| <ul style="list-style-type: none"> <li>• Brighton &amp; Hove Domestic Violence Needs Assessment and Commissioning Strategy 2011</li> <li>• Brighton &amp; Hove Joint Strategic Needs Assessment 2012</li> <li>• Brighton &amp; Hove Alcohol Needs Assessment 2010/11</li> <li>• Brighton &amp; Hove Drug Related Deaths Needs Assessments</li> <li>• Brighton &amp; Hove Child Poverty Needs Assessment</li> <li>• Brighton &amp; Hove Sustainable Community Strategy</li> </ul> | <ul style="list-style-type: none"> <li>• Brighton &amp; Hove Divisional Policing Plan 2010-13</li> <li>• Brighton &amp; Hove Housing Strategy 2009-14</li> <li>• Single Homeless Strategy 2009-14</li> <li>• Brighton &amp; Hove Turning The Tide Strategy 2009-2014</li> <li>• NHS Brighton &amp; Hove Strategic Commissioning Plan</li> <li>• Brighton &amp; Hove Children and Young People's Plan 2009-12</li> <li>• Safeguarding Adults Board Plan</li> </ul> |
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## Key performance indicators

- Percentage of referrals to a Multi-Agency Risk Assessment Conference (MARAC) who are repeat clients
- Percentage of domestic violence crimes solved
- Percentage of finalised prosecutions with resulting in a conviction
- % of MARAC domestic violence victims reporting feeling safer at the point of leaving the IDVA service

Domestic Violence Action Plan
Summarised from the Domestic Violence Commissioning Plan
<b>Prevention</b>
<b>Area of work 1</b>
<b>Measures designed to raise awareness and knowledge of local communities, and enhance the capacity of communities, family and friends, to respond effectively.</b>
<b>Actions</b>
1.1 Increase knowledge through provision of information and resources targeting family and friends, and through workshops, meetings and outreach targeting communities.
1.2 Support the development of discussion groups amongst different communities and build the capacity of community groups to respond to domestic violence.
1.3 Support and build capacity of Black and minority women's groups locally to improve responses to women's safety and well-being and improve community responses to domestic violence
1.4 Support the development of community-led awareness raising of forced marriage through professional and community engagement and outreach programmes.
1.5 Support the development of community-led outreach work on issues of female genital mutilation with young people and women from communities at risk.
1.6 Raise awareness of the support needs of Gypsy and Traveller communities and how to meet these needs effectively
1.7 Continue to explore how culture and arts organisations, and how commissioning for cultural activity, can help contribute to prevent domestic violence

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1.8 Integrate domestic violence awareness raising work amongst communities with actions to achieve the 'white ribbon city status' as part of the Violence Against Women and Girls Strategy

### Area of work 2

#### Targeted and universal domestic violence publicity campaigns, and workplace policies

##### Actions

2.1 Develop and sustain a city-wide media and communications strategy to deliver universal and targeted awareness campaigns targeted at perpetrators, survivors, young people and the public (informed by national best practice toolkits). Promote national guidance for journalists on reporting violence against women across local press and media.

2.2 All services to publicise domestic and sexual violence, the help available, and how their agencies can respond, and to create safe environments to encourage disclosure.

2.3 Develop workplace domestic violence policies and campaigns (informed by national best practice toolkits) and implement these across the private, public, community and voluntary sector.

2.4 Review and publicise the council Domestic Violence Workplace Policy and Procedures to ensure it incorporates best practice and incorporate into the council's new People Strategy for 2012/13, and roll out training for managers on its delivery.

2.5 Coordinate and support the annual *Brighton & Hove 16 Days* programme of events to mark the international 16 Days to end violence against women (November 25<sup>th</sup> - December 10<sup>th</sup>), to include supporting a *Stand-Up to End Violence Against Women* organised by *Charity Chuckle*.

### Area of work 3

#### Prevention, education and skills development

##### Actions

3.1 Provide a whole school approach to domestic & sexual violence prevention across all schools in Brighton & Hove, in partnership with specialist services (informed by best practice evidence of what works) and to include independent domestic violence support for children and young people.

3.2 Incorporate domestic and sexual violence into sex and relationships education (SRE) and Personal, Social and Health Education (PSHE) lessons.

3.3 Ensure services that deliver healthy relationships work with children, young people and families incorporate domestic and sexual violence as part of service delivery.

3.4 Develop and deliver programmes to increase resilience of survivors, children and young people that includes: accredited women and girls self defence classes; programmes that address domestic violence in teenage relationships; and work on child-to-parent abuse (Break4Change programme) through multi-agency partnership with specialist domestic violence services.

3.5 Develop and deliver a survivor involvement programme to encourage co-production at all stages of the commissioning and service delivery process and includes training survivors in the development and review of services, training and research.

### Early intervention

#### Area of work 4

#### Training for professionals and front line staff to spot early signs and risk factors of all forms of domestic and sexual violence.

##### Actions

4.1 Develop and train local trainers to deliver a modular training programme on domestic and sexual violence awareness and skills for intervention, for all front line professionals (housing services, adult services, children's services, schools and education services, health services, criminal justice services) which includes risk assessment, effective response and safety planning, and referral on disclosure.
4.2 CAF and PPP training to include identification of the presence and risk of domestic violence to children as well as to adults assessed, undertaken safely and separately with parents to ensure that the needs of both adult survivors and their children are fully met.
4.3 Promote delivery and monitor take-up of the new national e-learning training course for GPs on violence against women and children.
4.4 Organise and secure attendance at training on domestic and sexual violence for local dental clinicians (as recommended by B&H LINK)
<b>Area of work 5</b>
<b>Fully accessible universal/targeted/specialist services so that survivors and perpetrators face minimal barriers to seeking help and to accessing the support they need.</b>
<b>Actions</b>
5.1 Implement policies on the safe use of interpreting services in cases of domestic and sexual violence for all agencies, and support specialist services to enable access to interpreting services.
5.2 NHS and council services to publicise that services are accessible for survivors and children whatever their immigration status, if they have experienced violence and abuse.
5.3 Local arrangements to ensure that survivors and their children with insecure or temporary immigration status are supported while they access safety and the violence is prevented, and/or while their case for indefinite leave to remain in the UK is developed and considered nationally.
5.4 Build the capacity of BMER, disability and LGBT organisations to work alongside specialist domestic violence services to support survivors, children and perpetrators.
5.5. Monitor the impact on domestic violence survivors of changes to housing benefit rules in terms of access to safe, secure and affordable housing in the city (single people aged from 25 to 34 will only be entitled to the Housing Benefit shared accommodation rate)
<b>Area of work 6</b>
<b>Early identification and response procedures for all aspects of domestic violence through routine and selective (safe) enquiry and improved initial response to disclosure across public services – for survivors, children and perpetrators.</b>
<b>Actions</b>
6.1 Review and update (and develop where there are gaps) domestic violence service delivery procedures across council and health services that adhere to national occupational and service standards
6.2 Safe, selective enquiry to be implemented in healthcare settings, children's services and adult services, in accordance with national best practice models.
6.3 Audit services that exercise public functions in relation to safeguarding children and adults with support needs to ensure implementation of the national statutory guidance on forced marriage, and national multi-agency guidance on FGM.
6.4 Building on the LES 2011/12, ensure GP practices/Optometrists/Pharmacists to deliver selective enquiry and response to domestic violence.

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

6.5 Develop targeted early intervention in GP practices by delivering the nationally evaluated IRIS (Identification and Referral to Improve Safety) programme to enable targeted GP practices to deliver early help through training, selective enquiry and improved responses with clear pathways for referral to an independent domestic violence advocate/educator and domestic violence support and advocacy services on disclosure.

6.6 Increase resilience by developing and delivering the nationally evaluated multi-agency DV Coordinated Community Group programme for children and young people and concurrent group for mothers who have experienced domestic violence (to be delivered through multi-agency partnership).

6.7 Healthcare, children's and adult services professionals to be trained in early identification and response to perpetrators.

### Area of work 7

**Targeted early identification and intervention work with groups who possess certain risk factors, across all forms of domestic violence.**

#### Action

7.1 Targeted early intervention (routine enquiry and response) with clients at particular risk of repetitive and escalating violence and/or where it is known that domestic violence starts or escalates, based on clients' identify or life experience.

7.2 Substance misuse services to services to develop domestic violence guidance in accordance with national best practice guidance, including ensuring awareness of domestic violence is part of the information provided to alcohol and drugs workers in custody suites.

7.3 Domestic and sexual violence to be mainstreamed into sexual health and teenage pregnancy services and policy, and all sexual health and genito-urinary medicine clinics should introduce routine enquiry with all young women under the age of 18.

7.4 Young people's services to embed the importance of healthy relationships and respect and to use materials on teenage relationship abuse in their work with young people, teachers and schools

### Area of work 8

**Improve identification of and response to domestic and sexual violence amongst Gypsy and Traveller communities**

#### Action

8.1 Ensure any new site development addresses the safety needs of women and children in its design, development and management

8.2 Dedicated Gypsy & Traveller domestic and sexual violence advocacy post co-located in local specialist services; to be co-designed with Gypsy and Traveller women and expertise from Gypsy and Traveller DV/SV services.

8.3 Domestic and sexual violence procedures to be reviewed to ensure they address Gypsy and Traveller needs; and new procedures and training programme developed for Traveller Liaison Team, Traveller Education Team, early years/children's services, Traveller site staff.

8.4 Consult with Gypsy and Traveller women about their health, support and safety needs; and develop community capacity building to facilitate and support the promotion of gender equality, to bring about greater educational, health, economic and social inclusion.

8.5 Integrate work of Traveller Education Team with Healthy Schools Team work on gender equality and domestic and sexual violence whole school prevention work,

8.6 Domestic and sexual violence awareness campaigns to be publicised amongst Gypsy and Traveller communities; communications should include targetting perpetrators about the criminal justice penalties associated with domestic violence, rape and sexual violence

8.7 Explore how to deliver targeted interventions for Gypsy and Traveller perpetrators alongside required partner safety work; and identify and engage with Gypsy and Traveller male 'champions' to challenge the acceptance of gender-based violence and influence change

### Provision

#### Area of work 9

**Fully accessible universal and targeted services by trained, skilled staff equipped to identify and respond effectively to all aspects of domestic violence, including supporting survivors and families with multiple and complex needs.**

#### Action

9.1 All public services to integrate domestic violence training and procedures (see 6.1) and appropriate interventions to ensure any agency is able to deal with identification, risk assessment and management, and provide safe and appropriate interventions – with a focus on children & family services; adult social care services; housing services; community safety services; health and substance misuse services; and criminal justice services.

9.2 All public services and delivery units to appoint a lead professional to hold expertise on domestic violence, to advise on implementing the procedures and on identification, safe interventions and referral routes, monitoring requirements for victims and perpetrators.

9.3 Ensure domestic violence services and interventions are central to the holistic model for intervention for families with multiple and complex needs, involving mental health and substance misuse approaches, which also includes clear identification and referral pathways to community perpetrator programmes to ensure safety and reduce risks for non-abusing family members and children.

9.4 Improve the effectiveness of services working with 16 to 18 year old young people who are or have been affected by domestic violence, to support their transition from children to adult services

#### Area of work 10

**Provision of independent, specialist domestic violence services for survivors, perpetrators, children and young people that ensure safe separate provision for men and women, and are accessible to deal with all forms of domestic violence.**

#### Actions

10.1 Expand Rise's Domestic Violence Helpline making it more accessible for survivors and professionals to access specialist information, help and support.

10.2 Sustain Rise's refuge based support and resettlement service, and safe housing options including the Sanctuary Scheme; review LGBT survivors' access to safe housing options in the city; and include safety measures for domestic violence survivors in the commissioning framework for emergency and temporary accommodation contracts.

10.3 Sustain and develop the Rise IDVA service to ensure city-wide independent domestic violence advocacy for all survivors irrespective of risk, which includes targeted and intensive advocacy for high-risk survivors linked to the MARAC and SDVC; and the development of the health-based advocacy service (see below) to ensure it links to acute, specialist and primary care services in the NHS, extending to mental health and GP practices. Develop advocacy services for survivors using the family justice system.

10.4 Develop the domestic violence LGBT independent advocacy service, working with specialist domestic violence services and LGBT voluntary and community organisations.

10.5 Sustain and develop Rise's community outreach support, counselling and advocacy services for survivors needing a range of support within the community, in their own home or through drop-in centres; and build the capacity of the Inspire Project domestic violence pathway to enable improved access to support from domestic violence services.

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10.6 Sustain and develop Rise's specialist domestic violence support service for children and young people.
10.7 Develop and deliver safe, supervised child contact facilities for domestic violence survivors, children and young people and their non-resident parents.
10.8 Ensure the continuation of sexual violence support services (including ISVAs) that provide a range of specialist services, including Sexual Assault Referral Centres, for victims of rape or other forms of sexual violence, whether as an adult or a child.
10.9 Continue to support accredited interventions with domestic violence perpetrators and associated partner support, within and outside the justice system.
10.10 Integrate the Living Without Violence (LWV) Programme within the Family Intervention Project Team, maintaining two annual group work programmes and retaining Respect accreditation in 2012.
10.11 Ensure domestic violence interventions within other targeted services (like Brighton Oasis Project and the Family Intervention Project) work closely (seeking advice and joint working where appropriate) with RISE services and the Living Without Violence Programme.
<b>Area of work 11</b>
<b>Improved health service response to domestic violence</b>
11.1 Every NHS service should have a single designated person to advise on appropriate services, care pathways and referrals for all survivors of violence and abuse; and national evidence for domestic violence good practice in health care settings should be integrated into the local health safeguarding mechanisms to enable accountability for reducing and preventing domestic violence.
11.2 Sustain and develop the health-based independent domestic violence advocacy service partnership between BSUH and Rise in A&E, midwifery and urgent treatment service and ensure this links to early intervention work with GP services to be developed (IRIS Programme – see 6.5).
11.3 Domestic and sexual violence interventions to be mainstreamed into teenage pregnancy services, policy and practices.
11.4 Continue training midwives, health and early years visitors to ensure they are skilled to recognise domestic violence, respond and offer support, and signpost to other services.
11.5 Provide information to mothers from communities which practise FGM, during the antenatal assessment, as part of an integrated local pathway of care for FGM.
11.6 Mental health services should provide specialist targeted psychological support for survivors of current or past domestic violence, and integrate psychological support and treatment for survivors and their children into mainstream health services in primary and secondary care and in specialist agencies. Include domestic violence within Improving Access to Psychological Therapies training and competencies.
11.7 Continue (in readiness for Care Quality Commission registration) to embed the lead safeguarding role in GP practices with responsibility for maintaining awareness of child protection, adult safeguarding and domestic violence, and ensure domestic violence policies and procedures are understood and followed.
<b>Area of work 12</b>
<b>Effective specialist domestic violence court programme, Multi-agency risk management systems and integrated systems across other court services, including support for survivors using the criminal, civil and family court services.</b>
<b>Actions</b>
12.1 Support the continued delivery of the specialist DV court programme; and national and pan-Sussex guidance on SDVCs continue to be implemented.



12.2 Convene a Scrutiny Panel bringing members of the voluntary and community sector together with CPS lawyers and independent legal advisors to jointly review and scrutinise a random selection of domestic violence cases to highlight good practice.
12.3 Continue to support the Multi-Agency Risk Assessment Conference (MARAC) system to reduce harm to survivors of domestic violence, supported by a full-time MARAC Coordinator, and ensure high-risk victims have access to independent DV advocacy and that there are effective links to MAPPA, safeguarding children and vulnerable adults.
12.4 Improve family court monitoring and outcomes where domestic violence is prevalent.
12.5 Implement the domestic violence homicide review process and align with serious case reviews.
12.6 Guidance on Stalking and Harassment, on prosecuting FGM, on Investigating and Prosecuting Rape and Domestic Violence should be implemented effectively and be subject to compliance monitoring by the police and CPS.
12.7 Local arrangements are in place so that those who report to the police are linked in to independent support agencies; that the booklet CPS Policy for Prosecuting Cases of Rape should be widely available to all victims and should be given as a matter of routine to all rape survivors who have decided to report the rape to the police; that measures are introduced to routinely measure and review victim satisfaction with the CJS.
<b>Area of work 13</b>
<b>Workable structure for co-ordination and delivery of a domestic violence strategic action plan, including improved workforce skills and knowledge.</b>
<b>Actions</b>
13.1 The city domestic violence strategy to be aligned with a strategic approach addressing all forms of violence against women and girls crime types; and its delivery to be supported by a DV Commissioners Group and Operational Group for delivery, reviewing progress and making recommendations for improvement (alongside a process for involving survivors – see 3.5).
13.2 Domestic violence to be considered core business for city services and partnerships – domestic violence outcomes to be included in performance compacts and into partnerships strategies and action plans
13.3 Effective joint commissioning and pooling of resources to achieve the co-ordinated community response model, and the outcomes framework and commissioning priorities identified in the DV Needs Assessment and Commissioning Plan, in adherence with the principles set out in the needs assessment and to national minimum standards for domestic violence services.
13.4 Ensure B&H DV Forum and associated working groups are resourced and supported.
13.5 Local domestic violence workforce strategy to ensure professionals across public services are appropriately competent; training needs to be mapped to the Domestic Violence National Occupational Standards (NOS) developed for practitioners working with survivors and perpetrators.
<b>Area of work 14</b>
<b>Agreed recording and reporting against city-wide minimum data sets on domestic violence, within and across partner agencies.</b>
<b>Actions</b>
14.1 Consistent and practical data standards to underpin the analysis of quality, activity, outcomes and performance management by commissioners, NHS and third sector providers.
14.2 Record and monitor domestic violence data on victims and offenders by gender (male, female, transgender people) and relationship, ethnicity, disability and sexuality (lesbian, gay, bisexual).
14.3 Ensure compliance with statutory and legislative requirements in relation to domestic violence.

## Sexual Violence, Abuse, Exploitation, and Trafficking

### Outcome: Sexual violence and abuse is reduced

#### Sub-outcomes:

- Increased awareness and knowledge of sexual violence and its impact
- Improved physical safety and freedom from harm
- Increased knowledge and skills of children, young people and adults about forming healthy relationships
- Raised public awareness about risk factors and promotion of personal safety; and healthy relationships based on mutual respect
- Victims feel safe to disclose, are listened to, believed and not judged
- Victims of sexual violence and abuse are supported through the criminal justice process and post sentencing
- Re-occurrence of offending behaviour is minimised by the strengthening of mechanisms and procedures for assessing and managing the risk posed by sex offenders
- Enhanced assessment of risk and therapeutic support services for children
- Enhanced and better integrated support services for victims and survivors of sexual violence and abuse
- Better information on services available and how to access them
- Improved physical, emotional, social and personal well-being

#### Definition:

Sexual violence and abuse is *'any behaviour perceived to be of a sexual nature which is unwanted and takes place without consent or understanding'*. This includes: rape and sexual assault; sexual violence and abuse (by partners, family members and by strangers); sexual harassment; sexual exploitation and child sexual abuse.

The definition includes all of those affected by such violence, including women, men and children, but also recognises the strong associations between sexual violence and gender-based violence which represent a significant cause and consequence of inequality for women.

The United Nations definition of trafficking, which includes trafficking for prostitution or sexual exploitation, is as follows: *Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.*



### Why this is a priority

Sexual violence and abuse has a devastating impact on victims, families and society as a whole. The effects of sexual violence and abuse can be wide-ranging and can include long-lasting physical, mental and sexual health problems. The Safe in the City Partnership has an important role to play in the prevention of rape and sexual violence, by providing services to better protect victims in bringing perpetrators to justice.

Much rape and sexual violence occurs in families, where children and young people are the victims, and most rapes are carried out by someone the victim knows. Nationally, around eight per cent of all recorded rape cases is a rape of a man, and research shows that men find it less easy to identify as victims and ask for help. Although men, women and children can all experience sexual violence, women are disproportionately victims, and as such sexual violence is recognised as both a cause and consequence of gender inequality.

Nationally, it is estimated that about 10,000 women will be sexually assaulted and 2,000 women will be raped in one week. Nearly a quarter of women have been stalked since the age of 16, and 18% of stalking leads to rape or sexual assault. Home Office research estimates that in the region of 3.7 million women in England and Wales have been sexually assaulted since the age of 16; and across the UK there are upwards of five million adult women who experienced some form of sexual abuse during childhood. Home Office research into prostitution also suggests that as many as 85% of women in prostitution report physical abuse in the family, with 45% reporting familial sexual abuse. Between 50-75% of women in prostitution entered before they were 18, and up to 75% of women in prostitution began when they were under 18 years of age.

Other research into trafficking across Europe found that 95 per cent of women trafficked into prostitution suffered physical and sexual abuse, with the same number experiencing symptoms of trauma similar to those suffered by torture victims.

Research tells us that women have a greater fear of rape or sexual assault than any other crime; women's routine decision making is organised around personal safety and minimising the risk of rape and other forms of violence, and this can significantly constrain their lives and restrict their ability to fully participate in society. Locally, the 2010 Citizens Panel survey showed that 13% of women, compared with 2% of men are very or fairly worried about being sexually assaulted. Preventing and reducing the incidence of sexual violence and abuse is therefore essential if we are to comply with gender equality duties. This does not mean that we are not concerned with other types of sexual

#### Main Partners

Survivors Network  
Mankind (Newhaven)  
Sussex Police (Rape & Serious Sexual Assault Steering Group)  
Crown Prosecution Service  
HM Courts Service  
Surrey and Sussex Probation Trust  
Brighton & Hove City Council  
(Children, Youth and Families Service; Clermont Centre; Adult Social Care Service; Housing Services)  
NHS Brighton & Hove  
Local Safeguarding Children Board  
Adult Protection Board  
Rise  
Inspire Project  
Brighton Women's Centre  
Brighton Oasis Project  
Sussex Central YMCA  
Sexual Violence Reference Group  
Sex Workers Strategy Group  
Sexual Exploitation Steering Group  
Domestic Violence Commissioners Group  
Domestic Violence Forum  
Alcohol Strategy Group  
Sussex Criminal Justice Board

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violence that do not come under the definition of gender-based violence. We recognise the complexity and different ways in which sexual violence is perpetrated in other groups such as men, young people, LGBT and BAMER communities. We are committed to tackling all forms of sexual violence through linking with partners who represent these diverse groups.

The individual, economic and social cost of sexual offences is higher than any other type of crime. The overall cost of sexual offences in Brighton and Hove in 2009/10 was estimated to be in excess of £61 million.

### Local picture

In Brighton and Hove in 2010/11 there were 346 police recorded sexual offences, and 240 recorded between April – December 2011. The actual number of sexual offences in the city is likely to be far greater than police statistics show. The 2007/8 British Crime Survey found that just 11% of victims who had experienced serious sexual assault since the age of 16 had reported their most recent experience to the police and 40% had told no-one at all about it. Research suggests that those who have suffered rape are less likely to report than those who have suffered a sexual assault, and those victimised by partners are less likely to report, as are men, disabled people, people from Black and minority communities, and those involved in the sex industry.

In Brighton & Hove in 2010/11 an estimated 2,085 women and 429 men aged 16-59 years are estimated to have experienced rape or sexual assault, and 3,419 women and 2,746 men are estimated to be victims of stalking. In the city 15,512 women and 2,145 men aged 16-59 years are estimated to have experienced sexual assault, and 15,095 women and 8,065 men are estimated to be victims of stalking since the age of 16<sup>13</sup>. These figures would be higher still if all the city's population and all types of sexual violence and abuse is considered.

Childhood sexual abuse and that experienced by young people is also included within the definition of sexual violence and abuse, but not in the above statistics. The *Cross Government Action Plan on Sexual Violence and Abuse, 2007* cites data from an survey of 18-24 year olds where 21% of females and 11% of males reported sexual abuse as a child. In Brighton & Hove during 2008 and 2009 45% of police recorded sexual violence offences against women were committed against 15-24 year olds. 11% of police recorded serious sexual offences between April and December 2011 in Brighton & Hove were committed against children under the age of 16.

Nationally and locally, there is a strong correlation between sexual violence and alcohol. Victims of rape and sexual violence may experience problematic alcohol use as a response to the violence and as an early predictor of post-traumatic stress disorder development. Although rape and sexual violence happens at any time of day, local data of reported rape and sexual violence indicates links to the night time economy both in terms of a city centre geographical hotspot and peaks in offences occurring on Friday and Saturday nights. Possible reasons for this association include perpetrators using alcohol as an excuse, the targeting of victims because alcohol consumption is perceived to make them more vulnerable and less likely to be able to consent to sex, or remember details of the attack. However, rape and sexual assault survivors are never responsible for the attack or the perpetrator's behaviour, no matter how much alcohol was consumed. Responsibility lies with the perpetrator.

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<sup>13</sup> Prevalence data based on table 3.01 in Home Office report '*Homicides, Firearm offences and Intimate Violence 2010/11*', HOSB 02/10, and applied to Brighton & Hove 2010 mid-year population estimates

Nationally, conviction rates for sexual offences are too low, despite being at their highest level for ten years. The Sussex Sexual Assault Referral Centre (SARC) based in Crawley combines forensic and clinical services for people who have been raped or sexually assaulted. The SARC aims to increase the quality of evidence collected and victim's ability to support prosecutions against perpetrators. This statutory service is complemented by local independent rape crisis, advocacy and counselling services. In 2010/11, the SARC supported 70 Brighton and Hove clients. Between April - December 2011, Survivors Network supported 100 local survivors through its independent sexual violence advocacy service, 52 of whom were referred via the SARC.

Mankind, a local agency that offers support to men who have experienced sexual abuse, assault and/or rape reports that about 50 of their clients come from Brighton & Hove each year. This gives some idea of the amount of under reporting that exists in the male population. Sexual violence is traumatic regardless of gender, but due to the way men are socialised in our society, men can find it more difficult to acknowledge victimisation and its effects. This can make it more difficult for a man to come forward and seek help. Men face specific barriers to disclosing sexual violence including being believed, fears around confidentiality, being judged as gay and/or not being a real man for letting the incident happen. In order to make reporting for men a viable option, we need to understand more about the barriers and create specific services and pathways that are sensitive to these.

People in the sex industry are amongst those who are at higher risk of victimisation of sexual violence and are less likely to report incidents. While Brighton & Hove does not have visible 'on street' prostitution, a significant number of women in prostitution are based in sex parlours in the city. A local survey revealed that 58% of those surveyed who were involved in the sex industry reported that they had experienced violence or abuse and, of those, only 13% had reported those incidents to the police.

### Current context

In November 2010, the government launched their Violence Against Women and Girls Strategy, identifying sexual violence and abuse as a government priority. The strategy emphasises the importance of preventative work, challenging the attitudes and behaviour which foster violence against women and girls, and the importance of intervening at an early stage to prevent violence from occurring. The strategy's accompanying action plan emphasises the importance of partnership working so that the best outcomes for victims and families can be obtained.

The government's 2012/13 action plan '*Call to End Violence Against Women and Girls: Taking Action – the next chapter*' sets out the outcomes to be achieved. Details of these can be found in the section on domestic violence

In response to the 2007 Sussex-wide Barnardos '*Tipping the Iceberg*' and the University of Brighton '*Out on My Own*' reports, the WISE (What is Sexual Exploitation) project has been funded to work with the safeguarding board to develop a support pathway, run assertive outreach with young people, train organisations and raise awareness in the local community about young people and sexual exploitation. It also runs the 'eyes and ears' campaign to help young people to communicate messages to other young people.

Sexual violence and abuse has been a priority for our partnership since 2008. In June 2010, Brighton and Hove's overview and scrutiny panel highlighted gaps in the provision of support to victims and made a series of recommendations. Since this time, Sussex-wide joint commissioning arrangements established a Sexual Assault Referral Centre

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and commissioned counselling, rape crisis and Independent Sexual Violence Advisor services provide improved outcomes for victims.

### **Where next?**

This strategy and action plan seeks to sustain the progress made in the previous plan around the work of the Sexual Assault Referral Centre and local rape crisis and support service. At the same time it identifies important additional areas of work to deal with the seriousness of sexual violence. Those new areas include initiatives which will reduce related risk factors, increase confidence to report, provide support through the criminal justice process, enhance services for children and young people, and increase knowledge about how to form healthy and not abusive relationships. Targeted work is also included for those at particular risk such as those working in the sex industry. There are also actions aimed at reducing fear, especially among women. We recognise the added value of co-ordinating actions across city services to provide holistic services which provide the best service to victims and accord with good practice.

In 2011/12, in addition to prioritising the strengthening of specialist independent sexual violence services for survivors, foundations have also been laid to deliver a coordinated work programme on domestic and sexual violence prevention in schools; work to increase the capacity of Black and minority women's groups in the city, and deliver a modular training programme and revise procedures for public services. In 2012 we also aim to improve responses to domestic and sexual violence amongst Gypsy and Traveller communities; work more closely with the universities on addressing sexual and domestic violence amongst students and university staff; and coordinate a publicity strategy to contribute to early intervention.

### **Links to other priority areas**

Work around sexual violence and abuse links to a wide range of other areas in this Community Safety Strategy. There are clear links with domestic violence, alcohol misuse, drugs misuse, preventing reoffending, children and families and the physical environment, infrastructure and quality of life strategies and action plans.

Partnership work around sexual violence and abuse also contributes to a number of the priorities in the Brighton and Hove Sustainable Community Strategy, including: reducing crime and improving safety; improving health and well-being; strengthening communities and involving people; and providing quality advice and information services. The work to address sexual violence and abuse will also be incorporated within a new Violence Against Women and Girls Strategy for the city from 2012.

### **Implications for equalities and sustainability**

Reducing the incidence of sexual violence and abuse, as well as the fear of victimisation, is essential to the physical and mental well-being of Brighton and Hove residents, and therefore the social and economic sustainability of the city.

Sexual violence is both a cause and consequence of gender inequality; women and girls are more likely to be victims than men and boys, and young women in particular suffer higher levels of victimisation. Work towards achieving the prevention and reduction of sexual violence and abuse must address existing gender inequalities which can give rise to the behaviour of perpetrators. Vulnerable and marginalised groups are often at increased risk and are less likely to report sexual violence and access help. This work is therefore central to the delivery of gender, as well as other equality duties.

### Parallel plans

- Brighton & Hove Domestic Violence Needs Assessment and Commissioning Strategy 2011
- Brighton & Hove Joint Strategic Needs Assessment 2011
- Brighton & Hove Alcohol Needs Assessment 2010/11
- Brighton & Hove Divisional Policing Plan 2010-13
- Sussex Police: Rape, Sexual Violence and Serious Sexual Offences Strategy
- Reports and Action Plans of the Adult Safeguarding Board
- Reports & Action Plans of the Local Children Safeguarding Board
- Sex Worker Strategy and Action Plan
- Brighton & Hove [Sustainable Community Strategy](#)
- National Violence Against Women and Girls Strategy 2011

### Key performance indicators

- Number of police recorded serious sexual offences
- Percentage of sexual assault victims who are eligible for a SARC referral who go on to receive a service at the SARC
- Percentage of SARC referrals to independent support services who receive support
- Number of serious sexual offences detected/solved
- Percentage of finalised court cases resulting in a conviction
- Percentage of referrals to i) the SARC or ii) other specialist agencies who are repeat clients

## Sexual Violence, Abuse and Exploitation, the Sex Industry, and Trafficking Action Plan

### Area of work 1

#### Achieve an understanding of the nature and prevalence of sexual violence in Brighton & Hove and of actions that will decrease attrition rates

#### Actions

- 1.1 Continue to identify the nature and prevalence of sexual violence in Brighton & Hove, recognising the variety of contexts in which it can take place and the different profiles and circumstances of victims and offenders. Draw on findings from the Strategic Assessments of Sussex Police and the Sussex and Glasgow Caledonian Universities Research (2010)
- 1.2 Strategies, working groups and services to gather information about the nature and prevalence of sexual violence within their domain and information to be aggregated within partnership analysis documents to inform service development.
- 1.3 Improve partnership data on sexual violence and abuse by improving identification and data collection systems within adult social care services, health services, children's services and housing services.
- 1.4 Maintain a multi-agency data capture system that includes information from voluntary and statutory agencies including the police, sexual health and other appropriate services.



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1.5 Introduce integrated IT solutions which would enable extraction of information when a victim and offender is perceived 'Under the Influence' by the police.
<b>Area of work 2</b>
<b>Prevent sexual violence through increased awareness of its nature and prevalence in all contexts and of the practical measures that can be taken to reduce risks and opportunities</b>
<b>Actions</b>
2.1 Develop and implement a communications strategy that targets perpetrators and potential perpetrators about the criminal justice penalties associated with rape and sexual violence, and incorporate the association between perpetrators drinking and sexual violence within alcohol prevention publicity/education programmes, which promote safe drinking practices and the message that alcohol is no excuse for perpetrating rape or sexual abuse.
2.2 Raise awareness of rape and sexual violence and the help available amongst students in the city and on university campuses (utilising 'student nights' and fresher week events) which includes targeting perpetrators and promoting the consequences of rape in terms of sentencing.
2.3 Improve the universities' responses to rape, sexual violence and sexual harassment by: identifying routes for students to report sexual violence and improve their access to help and support; supporting the delivery of training for key university staff and student support services; developing methods for collating and analysing data on sexual violence from universities; and delivering a prevention programme which includes publicity targeting perpetrators and workshops challenging cultural attitudes that condone sexual violence.
2.4 Contribute to the work of the Sussex Rape Prevention Steering Group led by the police, and ensure local priorities and actions are reflected in its work programme.
2.5 Contribute to and ensure effective links with the LSCB sexual exploitation subgroup.
2.6 All strategy groups, including those which are addressing domestic violence, to incorporate information about rape and sexual violence in their publicity.
2.7 Incorporate preventative measures, targeting potential perpetrators of rape and sexual violence, within the good practice initiatives which are led by the Licensing Strategy Group and alcohol-related crime and disorder groups.
2.8 Develop improved outcomes for young people who display sexually harmful behaviours through commencing a series of activities which identify and disseminate a model of inter-agency working based on existing practices and available research evidence; focus on effective arrangements around transition from child protection/youth justice to adult processes; identify inter-agency and multi-disciplinary training needs; and disseminate best practice information.
2.9 In recognition of the association between stalking/harassment and incidents of sexual violence and abuse, work with specialist third sector and criminal justice partners to develop an effective community based response stalking and harassment, linked to the domestic violence action plan.
2.10 Explore how culture and arts organisations and commissioning for cultural activity can contribute to preventing sexual violence. Support the coordination of the annual <i>Brighton &amp; Hove 16 Days</i> programme of events to mark the international 16 Days to end violence against women (November 25 <sup>th</sup> - December 10 <sup>th</sup> ), to include supporting a <i>Stand-Up to End Violence Against Women</i> organised by <i>Charity Chuckle</i> .

<b>Area of work 3</b>
<b>Increase reporting of sexual violence through improved public confidence in the criminal justice system and lower rate of attrition which is well publicised</b>
<b>Actions</b>
3.1 Support Sussex Police in the delivery of their Rape, Sexual Violence and Serious Sexual Offences Strategy which aims to improve the investigation, detection and prosecution of cases, identifying appropriate partnership and support action for the Safe in the City Partnership
3.2 Raise awareness of the role of the police Sexual Offence Liaison Officers and develop integrated response services with the Sexual Assault Referral Centre and independent rape crisis, counselling and Independent Sexual Violence Advisor services.
3.3 Continue to publicise the national handbook: <i>'From Report to Court: a Handbook for Adult Survivors of Sexual Violence'</i> which meets the needs of victims and witnesses.
3.4 Target information towards groups who are most at risk and/or least likely to report recognising issues such as gender and gender identity, ethnicity, sexuality, disability, age, religion and belief.
<b>Area of work 4</b>
<b>Improved victim care and support services which meet survivor needs, and also assist police investigations and prosecutions and support improved attrition rates.</b>
<b>Actions</b>
4.1 Jointly commission <sup>14</sup> and participate in the Management Board of the Sussex Sexual Assault Referral Centre and ensure effective arrangements for the care and support of victims in the city.
4.2 Sustain support for and build capacity of the local independent rape crisis service which provides independent support, counselling and advocacy for victims, and which meeting national rape crisis service standards (published in 2012)
4.3 Sustain support to the Independent Sexual Violence Advisor service who, together with SARC services, provide support, risk assessment and safety planning for victims of rape or other forms of sexual violence, whether as an adult or a child. Link with the specialist DV and criminal courts where appropriate and support clients through statement taking, pre-court visits and trials, also referring clients to health, housing and childcare services.
4.4 Build the capacity of the Inspire project sexual violence pathway to enable improved access to specialist support from independent sexual violence services, according to national standards.
4.5 Raise awareness of the support needs of Gypsy and Traveller communities and how to meet these needs effectively in relation to rape and sexual violence. To include: ensuring any new site development addresses the safety needs of women and children in its design, development and management; a dedicated Gypsy & Traveller domestic and sexual violence advocacy post co-located in local specialist services; consulting with Gypsy and Traveller women about their health, support and safety needs; and publicising information on rape and sexual violence amongst Gypsy and Traveller communities including targeting perpetrators about criminal justice penalties
4.6 Training for professionals who may come in to contact with victims, including those who may deal with first disclosures (GPs, A&E providers, health visitors, mental health providers, youth workers, voluntary sector agencies, community groups).

<sup>14</sup> The joint commissioning and management arrangements also links with NHS sexual health strategies and public health delivery plans.

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4.7 Ensure compliance with gender and other equality duties, particularly around the provision of appropriate services for victims of crimes where the majority of victims are women. Pilot a service to identify appropriate approaches for male victims of sexual crimes which is delivered in an accessible and appropriate environment.
4.8 Ensure local arrangements are in place so that those reporting sexual violence to the police are linked to independent support agencies; make the CPS booklet <i>Policy for Prosecuting Cases of Rape</i> widely available to all victims and ensure it is given to all rape complainants reporting to the police as a matter of routine. Measure and review victim satisfaction with the CJS as a routine.
4.9 Integrate responses to sexual violence within work to address the support needs of families with multiple and complex needs (which often involve historical or current sexual violence), ensuring specialist sexual (and domestic) violence services are central to that model. Ensure clear identification and referral pathways to support services for survivors and criminal justice/offender programmes for perpetrators.
<b>Area of work 5</b>
<b>Support for the work programme of the Sex Workers Steering Group which seeks to reduce risks and provide routes out of prostitution and related circumstances.</b>
<b>Actions</b>
5.1 Continue to take forward the Sex Workers Steering Group work programme and further develop a strategic approach to rape and sexual violence of those involved in the sex industry
5.2 Support and respond to police led operations to identify trafficked women and their traffickers. Aim to ensure that local victims of trafficking from within the UK and from abroad have access to safety, support and protection.
5.3 Encourage the active and increased use of the 'Ugly Mugs' or 'Dodgy Punter' schemes, and other national good practice initiatives, which include challenging demand for prostitution, increasing safety of and support for those in prostitution, providing safe routes out of prostitution, and identifying perpetrators and bring them to justice.
5.4 Continue to target those most at risk by maintaining relationships with individuals in the sex industry, ensuring they get increased access into drug and alcohol services, domestic and sexual violence services, alternative housing and employment options in accordance with their needs.
5.5 Sustain support services for women in the sex industry and at risk of commercial sexual exploitation. Monitor the success of work that supports women to safely exit from prostitution.
5.6 Develop a programme of work to challenge demand by men who buy women for sex, which includes identifying offending associated with prostitution and bringing offenders to justice.
<b>Area of work 6</b>
<b>Reduce fear and raise awareness of the reality of rape and sexual assault for women, increase women's ability to report and/or seek help, and publicise any improvements in attrition rates and sentencing</b>
<b>Actions</b>
6.1 Ensure all work aimed at improving public perceptions of levels of crime and disorder and reduced fear of crime particularly addresses serious sexual offences, sexual assault and rape and others which are of most concern to women.
6.2 Ensure publicity and communications relating to rape and sexual violence avoids victim-blaming messages; avoids reinforcing a false distinction between 'genuine' and undeserving victims; recognises that women's routine decision-making is informed by the fear of sexual violence and that many victims who experience sexual violence do not report it; and that publicity needs to target communications to specific groups.



6.3 Raise awareness of and promote compliance with national guidelines on reporting sexual violence amongst local communications and press teams and the local media (violence against women guidelines for journalists due to be published in 2012).
<b>Area of work 7</b>
<b>Safeguard and build the resilience of children and young people to sexual assault and exploitation and respond to the threat of it</b>
<b>Actions</b>
7.1 Continue to deliver the Every Child Matters outcomes particularly the 'Staying Safe' and 'Be Healthy' work programmes overseen by the Local Safeguarding Children Board. These include actions to reduce the risks linked to unsupervised internet use by children and young people.
7.2 Implement a whole school approach to sexual violence prevention (linked with domestic violence prevention approaches in schools). Education programmes targeted towards young people and in schools, which address alcohol/drug misuse, sex/relationship education, teenage pregnancy and other risks, to include awareness raising of the association with sexual violence, issues of coercion and consent, the consequences for perpetrators and services for victims.
7.3 Reduce sexual and sexist bullying in schools -Work with schools to prepare for Ofsted inspections by working on the key area of inspection that focuses more strongly on behaviour and safety, including bullying. Inspectors will look for evidence of how much bullying there is in schools and how well it is dealt with.
7.4 Implement the findings of the <i>Joint Agency Audit into the Incidence, Recording and Outcomes of Child Sexual Abuse</i> investigations in Brighton & Hove.
7.5 Identify appropriate and effective early interventions for young people who sexually abuse or are at risk of abusing and support the delivery of those interventions.
7.6 Explore how agencies undertaking generic work with children and young people, such as CAMHS, include classifications of sexual abuse in their initial assessments.
7.7 Continue to support the WISE project and further implementation of the findings of <i>'Tipping The Iceberg – A Pan-Sussex Study of Young People at Risk of Sexual Exploitation and Trafficking'</i>
7.8 Support compliance as appropriate with 'Special Measures' in courts (compliance with 'Speaking Up for Justice' and Youth Justice and Criminal Evidence Act 1999) which offers enhanced protection for child witnesses
<b>Area of work 8</b>
<b>Work towards the development of a holistic strategy for tackling rape and serious sexual offences and violence which accords to national good practice, builds on existing plans and expertise together with a structure which supports multi-agency delivery of an agreed work programme</b>
<b>Actions</b>
8.1 Continue to support the multi-agency Sexual Violence Reference Group which receives reports from and co-ordinates the actions of individual working groups as identified in this Strategy.
8.2 The city sexual violence strategy to aligned with a strategic approach addressing all forms of violence against women and girls. The SV/VAW Commissioners Group and Operational Group to support delivery, monitor progress and make recommendations for improvement.
8.3 Deliver a programme to enable survivors to feed into all stages of the commissioning and service delivery process, including training survivors in the development and review of services, training and research.
8.3 Integrate sexual violence strategy and awareness raising work with actions to achieve the 'white ribbon city status' as part of the Violence Against Women and Girls Strategy.

## Hate Incidents and Crimes

**Outcomes: A reduction in incidents and crimes which are motivated by hostility or prejudice and in the harm caused to individuals and communities**

**An improvement in the trust and confidence of all minority communities and disabled people in services**

**Definition:**

Hate incidents are defined as any non-crime incident which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on:

- a person's race or perceived race (includes colour, ethnic origin, nationality or national origins, and culture),
- a person's religion or perceived religion (includes lack of faith),
- a person's sexual orientation or perceived sexual orientation,
- a person's disability or perceived disability,
- a person's gender identity - i.e. against a person who is transgender or perceived to be transgender.

Hate crime is 'any criminal offence which is perceived, by the victim or any other person, as being motivated by a hostility or prejudice based on a

Tackling harassment based on the grounds of race, religion, disability, sexual orientation and gender identity are amongst the various legal duties, which public bodies must comply with.

- The Equality Act 2010 provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all. Race, religion, disability, sexual orientation and gender identity are five of the nine identified 'protected characteristics'; people are protected from discrimination on any of these grounds.
- The equality duty (section 149 of the Equality Act) requires public bodies to eliminate unlawful discrimination, harassment & victimisation, actively promote equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not.
- The Crime and Disorder Act 1998 requires the Community Safety Partnership (CSP) to do all it reasonably can to prevent crime and disorder in its area. The Act also creates a number of specifically racially and religiously aggravated offences, which have greater maximum sentences than their non-racially or non-religiously aggravated equivalents.
- Section 146 of the Criminal Justice Act 2003 imposes a duty upon courts to increase the sentence for any offence aggravated or motivated by hostility based on the victim's actual or presumed disability, sexual orientation or gender identity.

- Developments in legislation (The Autism Act, 2009) and policies (Valuing People Now, 2009; National Autism Strategy, 2010) mean that there is a requirement to ensure that people with learning disabilities or an Autism Spectrum Condition can live in safe environment free from hate crimes, have improved access to redress and justice, and live in a society where people understand, respect and accommodate difference.

In 2010 the coalition's 'Programme for Government' made a commitment to improve the recording of hate crime. The government's Equality Strategy (December 2010) reiterated its commitment to tackle all hate crimes and violence. '*Challenge it, Report it, Stop it*', the government's plan to tackle hate crime published in March 2012, sets out three key objectives:

- prevent hate crime happening by challenging attitudes that underpin it, and early intervention to prevent escalation of incidents;
- increase the reporting of hate crime by building victims' confidence and improved access to support; and
- improving the operational response to hate crime.

The plan recommends a 'more effective end-to-end process, with agencies identifying hate crimes early, managing cases jointly, and dealing with offenders robustly'. The plan intends to:

- improve the evidence base regarding the scale, severity and causes of the problem;
- deal with hate crime in sport and on the internet; and
- promote good practice.

The government will provide appropriate advice and guidance to schools to tackle all forms of bullying, and through work with voluntary sector partners will provide resources and projects to schools to tackle prejudice based bullying.

The government has also launched a consultation in January 2012 '*Getting it right for victims and witnesses*'. This proposes that the forthcoming Police and Crime Commissioner may become the local commissioners of victims' services and, if so, when commissioning services they need to take account of the needs of victims of hate crime.

Locally, the Safe in the City Partnership is committed to dealing with and reducing levels of hate incidents and crimes and tackling prejudices that fuel such incidents. We are committed to building on our existing work and will address inter-sectionality (where people may be targeted for a number of identities), integrate considerations of gender and age within our work (older people scrutiny recommendations), and strengthen the inter-relationship between reporting of hate incidents and safeguarding of vulnerable adults and children. Following the Pilkington case review, there has been a shifting emphasis to a harm-based approach, identifying and supporting vulnerable and repeat victims, individuals and communities.

### Links to other priority areas

Work around hate incidents and crimes cross cuts other priority areas contained in this Strategy. There are connected concerns and services between the different strands of hate incidents, as well as with domestic and sexual violence, anti-social behaviour, alcohol related crime and disorder, children and young people, and older people. Additionally, there are wider links to safeguarding children and vulnerable adults, adult

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social care, housing, healthcare, and mental health services, as well as feeding into broader work around equalities and community cohesion. Work to tackle racist and religiously motivated incidents also links to 'Building Resilience' or the Prevent strategy which aims to stop people becoming terrorists or supporting terrorism and is part of the counter-terrorism strategy, CONTEST.

### **Implications for equalities and sustainability**

Hate incidents have a significant adverse effect on the health, wellbeing and quality of life of individuals and families. They also have a cumulative impact on minority communities, increasing fear of crime and undermining community cohesion.

Community cohesion is achieved where cultural diversity is encouraged, strong and positive relationships exist between people from different backgrounds, and where people trust one another and have trust in local institutions to act fairly. It is important for the social and economic sustainability of the city that all communities feel safe and participate fully in the city life.

The economic cost of hate incidents is yet to be ascertained in terms of damage to property and the physical environment, health expenditure, potential loss of employee productivity, and policing. Research has shown that hate incidents, if unchecked escalate over time. Tackling incidents early therefore prevents more serious crimes occurring in the future.

Legislation and policy emphasise a human rights based approach to hate incidents and crime, which is what we have adopted in Brighton and Hove. By nature, our work is with individuals and communities whose quality of life and trust in public bodies is undermined due to targeted incidents, harassment and violence. Our work pursues equality, empowerment and social inclusion for minority and disadvantaged groups in our society. In working to reduce hate incidents, we promote equality of opportunities for victims, witnesses and minority communities. We undertake Equality Impact Assessments and have integrated actions arising from the assessments in our action plans as set out in the sections which follow.

## Racist and Religiously Motivated Incidents and Crimes

**Outcome:** A reduction in racist and religiously motivated incidents and crimes and in the harm caused to the individuals and communities.

**Sub-outcomes:**

- There is increased reporting of racist and religiously motivated incidents, particularly from at risk and marginalised groups
- Repeat victimisation is identified, prevented and reduced
- There are improved outcomes for the victims and witnesses
- There is improved trust and confidence by minority communities in services

**Definition:**

*'A racist or religiously motivated incident is any incident which is perceived to be racist or religiously motivated by the victim, witness or any other person.'*

This includes incidents that occur through association with a person of a racial/ religious group, as well as where an individual is targeted due to a presumption that they are from a racial/religious group. Religiously motivated incidents also include incidents based on lack of faith.

### Why this is a priority

It is estimated that the Black and Minority Ethnic (BME) population in the city has increased to 9% of the total population. Tackling racist and religiously motivated incidents is an important priority both locally and nationally. Evidence suggests under reporting of racist and religiously motivated incidents. Evidence also suggests that anti-Muslim hate incidents have increased both in terms of numbers and severity, and continue to be under-reported.

The impact of racist and religiously motivated incidents is higher on Black and Minority Ethnic (BME) victims compared with victims of other crimes, and there is significant harm caused to the individuals and their families. Incidents may also impact collectively upon communities, increasing fear of crime, and lowering confidence in the criminal justice system. This means that BME community

### Main Partners

Racial Harassment Forum  
Refugee Forum  
BME, faith, and refugee community groups and businesses  
Gypsy and Traveller communities and support organisations  
Sussex Police  
Partnership Community Safety Team  
NHS Trusts  
Children, Youth and Families Services  
Social housing providers  
Crown Prosecution Service  
HM Court services  
Surrey & Sussex Probation Trust  
Adult Social Care  
Local Safeguarding Boards

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members who experience racist<sup>15</sup> incidents do not always seek or receive the support they need. The most damaging effect is that these prejudices are 'normalised' which prevents the creation of inclusive, cohesive, and resilient communities.

The level of recorded racist incidents continues to decline locally, but it is difficult to be confident that the extent of the decline seen in the data reflects the numbers actually taking place and being reported in the city to various partners. Analysis has identified that certain groups experience increased risk and that there is a strong link between risk and actual victimisation. Age, gender, ethnicity, religion, being visible or identifiable as a member of a minority community, type of occupation, and living in deprived areas, or areas where BME communities do not have a long history of residence are all found to be risk factors. Individuals, their property, and religious institutions were found to be targets of incidents. Communities also at an increased risk of targeted incidents or crimes and under-reporting, include Gypsies, Irish travellers, Roma, refugees, asylum seekers, migrant workers, overseas students, BME businesses, and those who work in front line occupations, particularly health service workers, food and retail outlets, and bus and taxi drivers. Disabled and LGBT members of BME communities may experience multiple disadvantages if they are targeted for reasons of their ethnicity as well as disability /sexual orientation. Analysis also shows that peaks in reported incidents correlate with international and national events and tensions, religious festivals, and racist discourse in the media, politics and public domain.

### **Current context**

In Brighton and Hove, the Safe in the City Partnership has a lead responsibility for tackling and reducing hate incidents and has consistently prioritised work in this area. We have an established history of using a structured, victim-centred, and multi-agency approach to tackling racist and religiously motivated incidents and supporting victims and communities. These provide the full range of criminal and civil justice remedies to resolve safety issues, reduce harm, protect victims and, where appropriate, bring offenders to justice. Our focus has been to empower victims and communities to increase reporting through developing accessible information and accessible means of reporting by working in partnership with the BME, community, voluntary and statutory sectors. Risk-assessment tools have been trialled in the city to identify risk and harm to the victims, and a multi-agency case management system and risk assessment conferences are being used to deliver improved responses to high risk victims. Sussex Police have introduced new policies, procedures and training, to improve recognition, recording of and response to hate incidents. We continue to develop effective partnership responses to support victims city-wide (for example, protocols to protect vulnerable victims), integrate safeguarding work with the reporting of hate incidents, and disseminate good practice through training.

### **Community engagement, trust and confidence**

The Partnership supports the Racial Harassment Forum (RHF), a multi-sector partnership identified as a key good practice initiative in the Stephen Lawrence Inquiry report. The RHF is consulted on and is a partner in developing the strategic priorities and comprehensive actions to reduce racist and religiously motivated incidents and crimes in the city as set out below. The RHF also monitors progress on the Strategy, scrutinises reports on levels and trends of incidents, and scrutinises the statutory agencies' responses to the victims of racist incidents through its four working panels. We continue to respond to the community safety concerns of at risk and excluded

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<sup>15</sup> From here onwards the term racist is used to encompass religiously motivated incidents too, for the sake of brevity.



## Racist and Religiously Motivated Incidents and Crimes

groups through specific projects. We continue to monitor, and analyse tensions and carry out reassurance work with communities to reduce risks, as appropriate. We have a variety of routes to engage with the community and link in with a number of faith-based, inter-faith and non-denominational forums as well as our diverse BME and refugee communities. Our aim is to access diverse sections of these communities including women, older people and younger people. These direct relationships enable us to address the concerns of communities and deliver solutions which further protect them. Tackling racist and religiously motivated hate incidents is identified as a high priority by the community to reduce harm and in maintaining trust and confidence. Additionally, consultation has identified further priorities of tackling rising Islamophobia, tackling under reporting of racist incidents by women, and tackling right-wing extremist groups' activities and marches in the city.

### Where next?

Whilst we are committed to reducing racist and religiously motivated incidents and crimes and the harm caused to individuals and communities, we recognise that many racist incidents are not reported and that religiously motivated incidents are on the rise. Only by increasing reporting from at risk and vulnerable groups and those subject to religiously motivated incidents, can we gain a better understanding of the extent of hate incidents and crimes, bring the perpetrators to justice, and support victims and communities effectively. There is a strong case for maintaining and strengthening casework services to support victims and witnesses and work with perpetrators in the city.

The Safe in the City Partnership will build on its existing work and specifically respond to the recent consultations and concerns as outlined above. We aim to prevent and reduce racist incidents through developing effective partnership responses and will continue to support the Racial Harassment Forum in its review, in implementing the changes. We will also continue to work with communities to celebrate our commonality, and to reduce risks and community tensions.

### Parallel plans

- |   |  |
|---|--|
| • The Equality Act, 2010, and the Equality Duty | • Challenge it, Report it, Stop it. The Government's Action Plan on Hate Crime, March 2012 |
| • Equality Strategy, 2010                       | • Safeguarding Adults Board Plan 2011 - 2013   |
| • National DCSF guidance: 'Safe to Learn'       | • Brighton & Hove's Equality and Inclusion Policy  |

### Key performance indicators

- Number of racist and religiously motivated incidents recorded including those reported by at risk groups
- Number of police recorded incidents and crimes
- Percentage of police recorded crimes detected/solved
- Percentage of finalised prosecutions resulting in a conviction
- Number of repeat victims
- No. or % of victims who feel that their safety has increased, harm has reduced and who feel supported
- No of (effective) interventions with the offenders of racist incidents

Racist and Religiously Motivated Incidents and Crimes Action Plan	
Area of work 1	
<b>Increased reporting of racist and religiously motivated incidents and crimes, improved responses and services to those reporting</b>	
Actions	
1.1	Promote greater reporting and consistent recording of racist and religiously motivated incidents in the city. Improve identification of hate incidents within the Safeguarding Adults At Risk (SAAR) procedures and anti-social behaviour reporting. Mainstream reporting mechanisms amongst the partner agencies and communities. Monitor and keep under review changing practices to ensure that we meet our strategic objectives and provide equal access to victims, witnesses and minority communities.
1.2	Increase reporting from at risk and vulnerable groups through targeted publicity, outreach work and support to raise awareness, through partnership work and specific initiatives. Translated information to be made available on support services and at first contact.
1.3	Enhance facilities to report and access services by creating reporting centres.
1.4	Increase reporting from the community, voluntary and statutory sectors, especially from the health sector and young people's settings. NHS Trusts to devise measures to increase reporting and embed it within their policies & practice. Statutory partners should integrate equality considerations in commissioning contracts and allocating funding that will promote reporting and tackling of all hate incidents by those contracted or funded.
1.5	Deliver a consistent high quality casework service to those reporting incidents; provide a second tier of intervention and support to victims of: critical incidents, cases that have a high community impact, cases that are significant to sustaining the victims and communities confidence in the public services, and where there is an identified gap or unmet need.
1.6	Further develop and test suitability of the risk assessment tools vis-à-vis victims of racist and religiously motivated incidents, and monitor numbers. Prioritise work with repeat victims (people who have reported more than one incident in any 12 month period) to support them and their families to prevent further victimisation. Prioritise work with high risk victims to reduce risk and harm caused.
1.7	Further develop the capacity of the multi-agency risk assessment conference to improve responses to high risk, vulnerable and intimidated victims and witnesses of racist incidents, to take enforcement action against the persistent offenders, and monitor numbers. Explore how the Black and Minority Ethnic, faith and refugee communities will be informed and involved in the conference.
1.8	Conduct client satisfaction surveys and act on feedback from the client in relation to the standards of service provided to them. Develop evaluation systems that will enable the services to measure the improvement in outcomes: increased feelings of safety, reduction in harm, incidents are prevented from escalation, and people feel supported etc. Undertake small research into victims' experiences of reporting racist incidents and adjust services according to findings.
1.9	Publicise reporting centres, reporting schemes and support services. Target distribution in response to the hotspot analysis, monitoring of trends, and according to needs. Review web-based information for accessibility and implement changes according to feedback. Translate information and make it widely available, as required.
1.10	Ensure clients are aware of statutory sector complaint procedures e.g. Council, Police, NHS, CPS, Probation and learn from complaints made.
1.11	Review, build on and mainstream learning from national and local research to ensure best practice.



## Racist and Religiously Motivated Incidents and Crimes

<b>Area of work 2</b>
<b>Effective monitoring systems to develop crime reduction strategies and improved accountability / reporting to minority communities and partners</b>
<b>Actions</b>
2.1 Develop and maintain a city-wide monitoring system of racist incidents, this data will enable us to direct future prevention and development work.
2.2 Produce regular reports on levels, trends and patterns and distribute them to the relevant forums and partners, make reports available on our website, further address their concerns.
2.3 Map and analyse hotspots for racist incidents to assist in problem solving, to assess the effectiveness of work undertaken, and to target resources appropriately.
2.4 All statutory partners including the Safeguarding Adults Board, police, social housing providers, and other key agencies to ensure that their systems are capable of disaggregating and monitoring number of different strands of hate incidents including racist and religiously motivated incidents, record and report information on the ethnicity, religion, age, gender ... or the protected characteristics under the Equalities Act.
<b>Area of work 3</b>
<b>Prevention and deterrence of offenders, reduced repeat offending and offenders brought to justice whenever appropriate through improved rates of detection, prosecution and court outcomes</b>
<b>Actions</b>
3.1 Monitor police and other criminal justice agency records to ensure early identification and tagging of racist and religiously motivated incidents, improved first response and quality of investigation. Monitor and assess the effectiveness of new procedures and training, and implement changes according to feedback to improve the experiences of victims and witnesses.
3.2 Develop and monitor tracking of criminal cases to check progress and provide feedback to the victims and communities.
3.3 Monitor the number of racist and religiously motivated crimes recorded and detected along with the number of arrests, cautions, prosecutions and convictions. Improve recording of outcomes in relation to religiously motivated crimes. Increase the number of successful prosecutions and reduce the number of discontinued cases. Monitor the use of special measures to the victims of hate incidents. Monitor the sentence uplift in the courts.
3.4 Develop a mechanism to identify and manage risk presented by offenders of racist & religiously motivated incidents. Review policies and practices relating to the recording and referral of issues relating to repeat offending, and prevent repeat offending.
3.5 Monitor and review effectiveness of the community resolution and other restorative justice interventions with regard to outcomes both for the victims and the perpetrators, report to the communities and act on their feedback to improve communities' confidence in the use of these remedies.
3.6 Work with known perpetrators and their families to address their prejudices by effective intervention and referral to appropriate services. Ensure that victims and those supporting victims and their families are able to input in the process and there is a two way flow of communication.
3.7 Work towards developing an Early Intervention Programme with young people in young people's settings.

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Area of work 4
<b>Deliver targeted initiatives, including specific projects, which aim to increase the safety of those vulnerable to particular risks and which contribute to the wider aims and objectives within the Strategy</b>
Actions
4.1 Council and Housing to continue to develop appropriate and specific policies and procedures and work with other social landlords and the private sector to minimise potential risk of vulnerable people from Black and Minority Ethnic, Faith and Refugee communities being housed in vulnerable locations.
4.2 Housing to develop strategy action points to combat racist and religiously motivated incidents and harassment, and ensure consistent responses are delivered to all reported incidents.
4.3 Develop specific projects/initiatives in partnership with communities and statutory partners to respond to specific concerns.
4.4 Set up a subgroup to assess the gap between experiences and reporting of racist and religiously motivated incidents by women in the community, take actions to narrow the gap between experience and reporting, monitor and evaluate the actions to assess its impact in terms of increased reporting.
4.5 In partnership with the colleagues from the Learning Partnership, set up a subgroup involving communities and key stakeholders to understand the implications of the national changes on reporting and tackling of racist and religiously motivated incidents in schools and make recommendations for the local arrangements (with regard to schools reporting to the Council, the Racial Harassment Forum and minority communities).
Area of work 5
<b>Promotion of an anti-racist/ anti-discriminatory attitude within communities, increased knowledge, skills and ability of the city's workforce to respond. Promotion of local community cohesion and engagement between existing and new communities, building bridges and links across all ethnic groups and faiths.</b>
Actions
5.1 Develop and support the Racial Harassment Forum following the conclusion of its review, develop links with external agencies/individuals from around the UK to bring inspiration and expertise to the RHF. Explore ways of engaging youth with the RHF. Review RHF publicity and refresh accordingly.
5.2 Statutory providers to consult and engage with BME, faith and refugee communities in developing priorities, services, and good practice with regard to i) racist and religiously motivated incidents ii) other services.
5.3 Deliver a rolling programme of training to key statutory, voluntary and community partners to raise awareness, improve recognition, mainstream the use of reporting forms, clarify referral pathways, help develop effective interventions, and link organisations to the multi-agency risk assessment conference (MARAC). Seek to involve communities in training wherever possible.
5.4 Prioritise promotion of clear and consistent anti-racist/discriminatory messages and raise awareness of racist bullying in young people's settings, particularly schools, using a variety of young person friendly media and training.
5.5 Work with English language schools, higher education establishments, universities, and host families to raise awareness of risks and reporting mechanisms among students including overseas students and address their safety concerns. Examine this process and ensure that it is targeted at the right people.

## **Racist and Religiously Motivated Incidents and Crimes**

5.6 Assess and respond positively to emerging tensions and potential conflicts. Monitor tension risk information in the city and carry out risk assessments as required, and particularly in response to international and national incidents or events. Engage BME, faith and refugee groups, voluntary and community organisations, respond to issues to minimise impact on communities and community cohesion, and prevent escalation, as appropriate.
5.7 Engage with refugees, asylum seekers, migrant workers, faith and BME communities and address their safety concerns.
5.8 Ensure statutory sector staff are trained in RRMI and BME, faith and refugee issues (particularly CPS and Probation). Examine how to involve the community in training staff and offender intervention programme.
5.9 Develop a proactive communications strategy to raise the profile of the anti-racist/discriminatory work, respond to negative publicity, publicise successful prosecution and to promote respect for diversity.

## Building Resilience and Preventing Extremism

**Outcome:** Build long-term resilience to all forms of extremism<sup>16</sup> amongst individuals, institutions and communities, reduce harm and increase trust and confidence.

**Sub-outcomes:**

- Individuals vulnerable to being drawn into extremist activities are identified at an early stage and supported to reduce risk
- Vulnerable institutions (such as schools, colleges, universities, places of worship, community centres, internet cafés, etc.) are supported to help manage risk
- The risk of harm caused to individuals and communities is reduced

**Definition:**

The national Prevent Strategy aims to 'stop people becoming terrorists or supporting terrorism'<sup>17</sup>.

The new national Prevent Strategy has three main objectives:

1. respond to the **ideological challenge** of terrorism and the threat faced from those who promote it;
2. **prevent people from being drawn into terrorism** and ensure that they are given appropriate advice and support ; and
3. work with **sectors and institutions** where there are risks of radicalisation which we need to address.

These objectives are also described as the three I's: Challenging **Ideology**, supporting vulnerable **Individuals**; and supporting vulnerable **Institutions**.

### Why this is a priority

The aim of the United Kingdom's strategy for countering international terrorism (Contest: July 2011) is 'to reduce the risk to the UK and its interests overseas from international terrorism, so that people can go about their lives freely and with confidence'. The government's plans to achieve this aim are set out within four main workstreams, which are: Pursue, Prevent, Protect, and Prepare. The Prevent

<sup>16</sup> Extremism is defined in the Prevent Strategy as 'vocal or active opposition to British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. In defining extremism, the Prevent Strategy also includes 'calls for the death of the [UK] armed forces, whether in the UK or overseas'.

<sup>17</sup> The current UK definition of terrorism is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

workstream requires a partnership approach between local authorities, a range of statutory and third sector organisations in localities and most importantly, local communities. The policy framework places communities at the heart of delivering this work. The local response to Prevent should be focused and proportionate, i.e. based on an assessment of threat, vulnerability and risk, shared by partners and communities. With regard to its objective of challenging ideology, the strategy states, 'it must not pass judgement on faith or suggest only a particular kind of faith is acceptable'. Greater emphasis is placed on evaluation of progress and monitoring of performance within a framework of value for money.

Although work on Prevent remains a national priority, the government's commitment to 'localism' gives greater flexibility to the local authorities and communities in making decisions. The Brighton & Hove approach has been to identify vulnerabilities and signs of extremism in order to support individuals who are at risk, and their families through care based interventions, to protect and divert them away from risks.

Analysis reveals that there is no single route to violent extremism/ terrorism nor is there a simple profile of those who become involved. The decision of an individual to become involved in violent extremism may reflect a complex interplay of the following causes: exposure to an ideology that seems to sanction violence; exposure to people who persuasively articulate that ideology and then relate it to an individual's life circumstances; a personal or identity crisis, including experiences of racism, discrimination, deprivation and other criminality (as victim or perpetrator); family breakdown or separation; and a range of perceived grievances, to which there may seem to be no credible and effective non-violent response. The Communities and Local Government Select Committee Report (March 2010) suggests that emphasis needs to be placed on politics, policy, and socio-economic factors rather than just ideological factors. The Home Affairs Committee (December 2011) found grievances and distrust in democratic institutions to be key drivers.

The nature of threat has diversified and is constantly evolving. The internet has emerged as a key resource in radicalisation process with some direct personal contact. Young people are found to be at an increased risk as digital content is made very attractive and persuasive that can be quickly and widely shared. The Home Affairs Committee identified education, greater awareness and interaction with other ethnic or religious

groups, and economic stability as important factors in resisting involvement with *Al-Qaida* influenced terrorism. The Demos report, '*Inside the EDL*' (November 2011), found that significant English Defence League (EDL) activity takes place on-line. Its on-line supporters were predominantly men, older (28% over 30 years old), and further educated (30% with college/university and 15% with a professional qualification) than previously thought. People can be drawn to right-wing terrorist ideology through the

### Main Partners

Sussex Police

Partnership Community Safety Team

Brighton & Hove Muslim Forum

Brighton & Hove Muslim Women

Sussex Bangladeshi Association

Universities (Brighton & Sussex)

Further Education Colleges

Al-Medinah & Al Quds Mosques

Children, Youth & Families

BHCC Communications

Brighton & Hove Interfaith Group

Student Unions and Societies

NHS Trusts

Learning Partnership

Probation

Communities of Places and Interests

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rhetoric and language of apparently non-violent right-wing extremist groups. Recently, Islamophobia and immigration have become important mobilising planks of extreme right wing ideologies.

### **Current context**

The Prevent Strategy 2011, has widened its scope to address all forms of terrorism including the extreme right wing. However, resource allocation is according to the nature of threat; the government identifies that the most serious threats to the UK are from *Al Qa'ida* and its affiliates. Therefore, this remains a principal focus nationally. The strategy identified the complicated relation between terrorism and extremism whereby terrorist ideology often draws upon or exploits extremist ideologies, and some people engaged in terrorist related activity have previously participated in extremist organisations. Preventing people becoming terrorists will require a challenge to extremist (and non-violent) ideas. The strategy recognises that Prevent will depend on a successful integration and community cohesion programme. However, it makes clear distinctions between measures to prevent terrorism from work to promote integration. Prevent and Integration strategies (work led by the Communities and Local Government) are linked through work to tackle extremism and intolerance by establishing a 'robust response to threats, whether discrimination, extremism or disorder, that deepen and increase tensions'. The Home Office will continue to develop Prevent centrally and continues to fund 25 priority local authority areas. Brighton and Hove is not a priority area, but we can draw upon wider Prevent infrastructure ie. the Sussex wide and Brighton & Hove Police Prevent lead, and dedicated Police Prevent Engagement officers in the city.

With dedicated staff and resources (local authority, police and key partners), we have built on and successfully expanded our engagement and outreach work to a wide section of the community and educational establishments including the universities. Involvement of local Muslim communities and key partners in the design, delivery and scrutiny structures through the Prevent Partnership Group and finance subgroup has fostered a shared ownership of the Prevent agenda locally. A city-wide supporting vulnerable individual process that uses the existing mainstream processes has been developed in line with the changed strategy. Through our work on hate incidents we have been effectively dealing with the grievances and causes of extremism. A small scale study to understand the needs, concerns and priorities of local Muslim communities has been completed and findings disseminated to influence mainstream program. A number of community projects have been funded, providing activities and safe spaces for young people and women. We continue to increase communities' capacity, through training and delivering projects in partnership to promote a positive understanding of Islam and to challenge extremist ideologies. Community members and key partners requested a clear communication strategy to proactively deal with negative publicity that adds to the grievances or causes of extremism or fuels prejudices. There is clear commitment amongst the statutory partners to take decisions in an informed, transparent and open manner, with clear accountability to local communities.

### **Where next?**

We intend to build on our existing best practice and ensure that Prevent work is mainstreamed. We will continue to support and build the capacity of communities and develop effective partnership responses. We will continue to prioritise supporting individuals vulnerable to extremism and terrorism, further develop risk assessment, information sharing protocols, and intervention. We will identify and support vulnerable institutions, work with the educational sector to develop 'safe' spaces, improve reporting of online extremist material and hate incidents, improve internet safety programme to



## Building Resilience & Preventing Extremism

highlight the dangers of online radicalisation, and to build resilience. We will revise our communication strategy, develop a shared understanding of the nature and causes of extremism and terrorism, including right wing terrorism, and identify solutions to mitigate risks and prevent its escalation. Jointly with our police colleagues, key partners and communities we will regularly identify levels of threat, risks and vulnerabilities and develop our action plan to be flexible and responsive to tackle specific risks and emerging threats. Next year, we will facilitate the Sussex Prevent Partnership Strategic Board, which will provide strategic oversight, monitor the action plan progress in the county, and develop and disseminate good practice.

### Links to other priority areas

There are connected concerns and services between Prevent and other strands of hate incidents, youth crime, safeguarding children and vulnerable adults, healthcare, mental health services, schools, colleges, universities and policing. Work in this priority area also feeds into broader work around equalities and community cohesion.

### Implications for equalities and sustainability

Stopping people from resorting to violence or terrorist action is fundamental to the security and wellbeing of all citizens. Whilst front line policing and intelligence are vital to countering terrorism, allocating resources exclusively to these activities alone will not address its root causes. That is why the communities themselves must be at the centre of an effective response to reducing violence, extremism and tackling disaffection.

### Parallel plans

- |  |   |
|--|---|
| • CONTEST 3 Strategy, July 2011                                | • CLG Select Committee Review (March 2010)  |
| • Prevent Strategy, June 2011                                  | • Community Development Commissioning 2012  |
| • National DCSF guidance: 'Safe to Learn'                      | • Sussex Police Prevent Plan, 2012  |
| • DCLG, Creating the Conditions for Integration, February 2012 | • House of Commons Home Affairs Committee – Roots of Violent Radicalisation, January 2012 |

### Key performance indicators

- Number of referrals
- Number of interventions
- Number of training sessions to increase understanding of extremism amongst frontline staff.
- Effectiveness of projects and partnerships supporting vulnerable institutions.

Building Resilience and Preventing Extremism Action Plan	
Area of work 1	
Understanding of, and engagement with, Muslim and other communities locally	
Actions	
1.1 Identify and map vulnerable communities in order to inform and implement an effective and inclusive engagement and empowerment strategy.	

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1.2 Further engage and improve our strategic communication with young people, women, men and other excluded and at risk groups in local communities. Support activities for young people and link them to mainstream services.	
1.3 Revise our communication strategy. Strengthen our relation with influential community groups, key opinion formers, mosques, other places of worship, and institutions to share issues and concerns around extremism and grievances that drive them.	
1.4 The Partnership Community Safety Team to ensure that the needs and concerns of the Muslim community are disseminated throughout the Safe in the City Partnership and influence mainstream work programmes as necessary to affect improved service delivery. Feed back the findings of the needs assessment to communities and partners to develop priorities, and a shared vision.	
1.5 Continually work to develop shared values by initiating events which increase understanding of faiths and create inter-community dialogues, particularly of the positive perspectives of the Muslim faith and our local Muslim communities, and challenge Islamophobia. The People's Day event is one such initiative and is organised with the B&H Muslim Forum and other faith organisations. Taking the lead from community leaders in the city, and together with members of inter-faith groups, celebrate significant religious festivals.	
1.6 Continue to build the capacity of Muslim women and facilitate the delivery of the parenting project.	
1.7 Work with Sussex and Brighton universities and with colleges to enhance the positive profile of Muslim communities within the student population. In particular, support the pastoral role of a dedicated Imam with a view to giving guidance and undermining extremist ideology, and develop an enrichment and mentoring scheme.	
1.8 Re-visiting and re-building the stakeholder structure and network to ensure that we have effective relationships and partnerships to take forward Prevent activity. Build the capacity of the Prevent Partnership Group so that it can fully represent the spectrum of community, faith and Inter-faith perspectives, support dialogue, initiatives and develop effective partnership responses.	
<b>Area of work 2</b>	
<b>Knowledge and understanding of the drivers and causes of extremism and the Prevent objectives to support work to tackle extremist ideology</b>	
<b>Actions</b>	
2.1 Keep abreast of and disseminate national good practice so that it informs the work of all partners and the Prevent Partnership Group.	
2.2 Develop a shared understanding of the causes of extremism and terrorism, including right wing extremism, and solutions to prevent its escalation. Provide leadership to the city in this respect and particularly of shared values.	
2.3. Provide training for front line staff across all key partners and community members to help increase understanding of faiths and local communities, increase confidence and capacity to identify vulnerabilities, clarify referral pathways and support vulnerable individuals. Increase understanding of the narratives used by extremists and terrorists (including right wing extremists) and how to challenge those narratives.	
2.4 Agree clear risk assessment processes and further develop information sharing protocols, particularly with colleges and the higher education sector. Formalise the process and systems for record keeping and tracking risk assessment.	



## Building Resilience & Preventing Extremism

2.5 Following national good practice ( <i>Learning Together to be Safe</i> and others), develop and deliver a programme of work for schools, children and young people, which increases the confidence and capacity of schools to understand: how the extremist narrative and ideology can be challenged; how to prevent harm and manage risks; how to support vulnerable individuals; how to increase the resilience of pupils and school communities; and how to use curriculum opportunities to air and resolve grievances through conflict resolution and active citizenship.	
<b>Area of work 3</b>	
<b>Development of a risk-based Prevent Action Plan, in support of delivery of the Prevent objectives</b>	
<b>Actions</b>	
3.1 Jointly with our police colleagues, key partners and communities regularly identify level of threat, vulnerabilities and risks and include within the action plan activities which will target and reduce those specific risks. Police to review the Counter Terrorism Local Profile commissioning process to produce a reactive threat and vulnerability document for the county.	
3.2 The Partnership Community Safety Team to monitor community tensions and carry out risk assessments, as required and particularly in response to international and national incidents or events. Respond to issues to minimise impact on communities and community cohesion, and prevent escalation, as appropriate.	
3.3 Brighton & Hove police to sustain opportunities for community and faith leaders to raise grievances and to manage partnership responses which effectively address those grievances.	
3.4 The Partnership Community Safety Team to continue to develop and deliver its work to address racist and religiously motivated incidents and crimes and to build trust and confidence within the Black and Minority Ethnic, Muslim and other faith-based communities.	
3.5 Provide opportunities and safe spaces for discussions and debates, particularly for young people, to address grievances that ideologues are exploiting. Continue the dialogue on foreign policy between the local communities and government officials.	
3.6 Build capabilities of the local communities, including young people and women, to develop leadership and confidence to challenge extremist ideologies. Ensure positive messages are targeted at vulnerable individuals to refute extremist messages.	
3.7 Continue to develop the city-wide supporting vulnerable individual process for individuals at risk of radicalisation and being recruited to the causes of violent/extremism. Identify and develop a range of care based interventions to support vulnerable individuals. Develop models of positive and productive partnership with local communities and other partners to support young people through one-to-one/interpersonal communication, mentoring opportunities and through other interventions.	
3.8 Identify vulnerable institutions; develop processes and activities that focus on strengthening them, creating a hostile environment for those who promote violent extremism, and building resilience. Increase understanding of the needs of our diverse communities and pupils amongst school staff and other practitioners, including challenging Islamophobia. Support City College and local communities to work in partnership to address issues of under-achievement of Bangladeshi pupils. Training for <i>Imams</i> , management committees and administrators of the mosques and Arabic school.	
3.9 Develop measures to effectively tackle cyber-terrorism and counter online propaganda and narrative. Work with the educational sector to develop 'safe' spaces, improve reporting of online extremist material and hate incidents, improve internet safety programme to highlight the dangers of online radicalisation, and to build resilience.	
<b>Area of work 4</b>	

## Community Safety, Crime Reduction and Drugs Strategy 2011-14

### Effective oversight, delivery and evaluation of projects and actions

#### Actions

4.1 The Partnership Community Safety Team to manage monitoring of effectiveness of action plan delivery within the performance management frameworks of the Safe in the City Partnership. Put in place systems and processes to evaluate local projects and measure the impact of activities, assess what is working well and use findings to adjust future programme of action.

4.2 The Prevent Partnership Group to maintain oversight of the delivery of the action plan and to assess progress.

4.3 Continue to involve community members in scrutiny structures and take decisions in an informed, open and transparent manner with clear accountability to local communities. Prevent Finance subgroup to scrutinise performance reports of the Prevent funded projects and activities.

4.4 Facilitate the Sussex Prevent Partnership Strategic Board to provide strategic oversight, monitor the action plan progress in the county, and develop and disseminate good practise.

## LGBT Hate Incidents and Crimes

**Outcome:** Hate incidents and crimes motivated by an offender's prejudicial views or hatred of sexual orientation or gender identity are reduced

**Sub-outcomes:**

- The safety needs of marginalised and vulnerable groups within the LGBT population are understood and reflected in the partnership's work
- Multi-agency and inter sector LGBT-led partnerships are strengthened and sustained
- Community engagement with LGBT groups, services and individuals is improved, building trust and confidence
- Awareness of best practice informed by research and service data is maintained and findings are further embedded and mainstreamed into the work of partners
- Joint working and capacity for responding to LGBT community safety issues among LGBT groups and services continues to develop
- LGBT community safety is mainstreamed across all services provided in the neighbourhoods where LGBT people live

**Definition:**

Homophobic, transphobic and biphobic hate incidents are defined as any incident which is perceived by the victim, witness, or any other person to be motivated by a hostility or prejudice based on a person's sexual orientation or perceived sexual orientation, or a person's gender identity, or perceived gender identity.

### Why this is a priority

Brighton & Hove has an estimated LGBT population of 40,000 people, and the city presents culturally as being socially inclusive and tolerant of sexual diversity. LGBT residents and visitors migrate to Brighton & Hove believing it to be a safe and tolerant city, but some may find that this is not always the case.

In response to the Count Me In Too survey conducted in 2006 almost three-quarters of lesbian, gay, bisexual or transgender respondents reported experience of crimes or

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negative behaviours<sup>18</sup> towards them in the previous five years (ie. between 2001 and 2006) because of their sexual or gender identities. (Not all of those experiences necessarily took place in our city.) At the time of the Count Me In Too study only 25% of those who had experienced an incident had reported it. In 2009/10 there were 88 hate incidents and crimes against lesbian, gay, bisexual or transgender people recorded by the police and this number has been declining steadily since 2006/7 when there were 218 recorded. Professionals working with the LGBT community do not perceive that there has been a decrease in trust and confidence which would account for this reduction.

However, a level of under-reporting will still exist and the LGBT community needs to have trust and confidence in services to effectively deal with hate crime. Poor outcomes for victims will undermine trust in the whole criminal justice system and we need to continue to provide the services to victims that they require and also continue our work to encourage reporting through other means.

LGBT hate incidents have a significant effect on the health, wellbeing and quality of life of individuals, as well as impacting on the wider LGBT community, increasing fear of crime and undermining community cohesion. Furthermore, Count Me In Too research highlighted the disproportionate impact LGBT hate crimes and incidents can have on vulnerable, excluded or marginalised groups within the LGBT community.

The Count Me In Too research showed that transgender & bisexual people, as well as those who self defined in a category other than lesbian, gay, bisexual or 'queer', young people (under 26), people who are isolated, and those who live in social housing are more likely to experience certain types of hate crime.

Data recording mechanisms around LGBT hate crimes and incidents across partner agencies are insufficient to allow in-depth analysis, and improving reporting is therefore a key priority. Analysis of police recorded LGBT hate crimes, however, has shown that hotspots for reported crimes remain in the city centre wards, and there are late-night peaks in offences. About 7 out of 10 victims of police recorded crimes were male. However, the Count Me In Too survey found that there was no difference in the likelihood of experiencing hate incidents between the genders. This suggests that there may be less likelihood that females are reporting to the police.

### Current context

The government has made a clear commitment to more effectively measure and tackle hate crime, promote better recording and encourage those who experience hate crime to report it. In specific relation to LGBT hate crime, the government's Equality Strategy states its commitment to supporting schools to tackle homophobic and transphobic bullying, including new forms of harassment such as that which occurs on-line. The government also commits to working with governing bodies of different sports to tackle transphobia and homophobia in sport.

#### Main Partners

Sussex Police  
Partnership Community Safety Team  
Crown Prosecution Service  
Courts service  
Primary Care Trust  
Housing services  
Brighton & Hove City Council Tourism and Leisure  
Children and Young People's Services  
Terrence Higgins Trust  
Brighton & Hove LGBT Switchboard

<sup>18</sup> The list of negative behaviours respondents were prompted with included negative comments, verbal abuse, teasing, harassment, physical violence, bullying, criminal damage, sexual assault and other.

Following the Pilkington case review, there has been a shifting emphasis to a harm-based approach, identifying and supporting vulnerable and repeat victims, individuals and communities and this approach is being followed locally.

Efforts have been made to increase reporting of incidents, with specific initiatives focused at increasing capacity within third sector organisations, such as developing a third party reporting system with LGBT Switchboard and working closely with the Terrence Higgins Trust in public sex environments (PSEs). Operation Reagan, a successful multi-agency project which is specifically focused on reducing violent crime in hotspot areas during the summer months, continues to take place. This has been strengthened with targeted outreach sessions from LGBT identified police officers directed at geographical LGBT communities and hard to reach and at risk communities, such as younger LGBT people, and men who have sex with men.

Locally, the previous Strategy saw the creation of multi-agency LGBT working groups, including a Casework Panel and an LGBT Community Safety Working Group, with standing groups around topics including mental health, housing and domestic violence and abuse. These groups have been instrumental in providing improved partnership solutions to reducing hate crime and incidents and mainstreaming LGBT concerns across front line services. One example is the weekly Trans drop-in sessions by The Clare Project, which are facilitated by LGBT PC officers and/or community safety officer to address issues for the Trans community.

During 2011 Partnership Community Safety Team casework services for hate crime and anti-social behaviour have been merged into a single team. As well as making effective use of resource, this has resulted in the availability of a PCST casework service to victims of LGBT hate incidents.

### Where next?

Whilst we remain committed to reducing LGBT hate incidents and crimes, and making Brighton and Hove a safer place for LGBT people, it is critical that we address under-reporting, and encourage those from at risk and multi-marginalised groups to report. This will enable a better understanding of the extent of LGBT hate incidents and crimes so we can bring perpetrators to justice, and improve outcomes for victims and communities.

There is still insufficient information being reported on LGBT hate incidents, meaning that repeat victimisation is likely, whilst opportunities to introduce good practice measures which educate, prevent and deter perpetrators are lost. Improved reporting, recording and monitoring of hate incidents is therefore identified as a key priority. We will seek to increase opportunities for third-party reporting through a common framework of shared reporting systems. We will be training partners and groups in the new hate reporting forms and helping them to identify different forms of hate incidents and encouraging reporting of incidents. This will allow us to carry out analysis on data collected across all agencies, focussing on areas such as criminal justice and offending patterns.

Our work to identify vulnerable individuals and communities and support them will continue. We will also seek to increase the involvement of identified multi-marginalised LGBT groups (BME, disabled, older people, etc.) in new initiatives, and work with our partners to introduce further inclusive cultural initiatives and projects which build civic capacity.

We will strengthen the link with democratic processes through working with the newly established LGBT Community Safety Forum. When appropriate, or requested we can support them in the development of work which would benefit reporting mechanism in

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the city and exploring ways of increasing both transparency and feedback into the development of city services to victims of LGBT hate crime. Through working more closely with neighbourhood teams across services within neighbourhoods we can also strengthen these links.

We will continue to develop our community engagement processes and increase the level of community capacity encouraging smaller groups to build partnerships with community and business partnerships where possible. We will also continue to support the community and organisations who give their time and expertise to help deliver work around LGBT community safety, including the work programme set out within this Strategy and action plan.

With the introduction of the Sussex Police and Crime Commissioner, we need to make sure that potential candidates are aware of LGBT (and other hate crime) issues in Brighton & Hove and we will be making briefings available on the LGBT communities' history, the community's needs and expectations.

At a strategic level, we will continue to contribute to partnership work which helps build community cohesion.

Effective use of the education system, (through schools, colleges, universities, and youth service) to promote better understanding of LGBT issues will be progressed. We will also closely liaise with housing services from the perspective of the victims of LGBT hate motivated incidents and make recommendations for improved service delivery.

We will continue to support victims and witnesses with the delivery of good practice casework, co-ordinating effective multi-agency responses and remedies. We will report to communities on the levels and trends of hate incidents, and carry out reassurance work with communities to reduce risk. Targeted work for communities under duress or temporary tensions are also appropriate ways of reassurance and building trust. We will respond to the safety needs of multi-marginalised people and support counselling services for survivors. This will also involve sustaining development work on LGBT mental health, domestic violence, anti-bullying and sexual offences. We will work to improve our services to individual victims in the transgender community to ensure there is comprehensive understanding on how to handle such cases.

### Parallel plans

<ul style="list-style-type: none"><li>• Domestic Violence Strategy</li></ul>	<ul style="list-style-type: none"><li>• Brighton &amp; Hove's Equality and Inclusion Policy</li></ul>
<ul style="list-style-type: none"><li>• Housing Strategy</li></ul>	<ul style="list-style-type: none"><li>• CPS 'Delivering Simple, Speedy, Summary Justice' policy document</li></ul>
<ul style="list-style-type: none"><li>• Brighton &amp; Hove's Children and Young People's Plan (2009-12)</li></ul>	<ul style="list-style-type: none"><li>• Brighton &amp; Hove Strategy for the Visitor Economy 2008/18</li></ul>
<ul style="list-style-type: none"><li>• Brighton &amp; Hove Alcohol Strategy – SDG3</li></ul>	

### Key performance indicators

- Levels of confidence and satisfaction reported in bespoke online survey – devise measurement and collect baseline data



## LGBT Hate Incidents and Crimes

- Number of active and effective LGBT partnerships with a community safety element.
- Number of police recorded LGBT hate incidents and crimes
- Percentage of crimes detected/solved
- Percentage of finalised prosecutions resulting in a conviction

LGBT Hate Incidents Action Plan	
<b>Area of work 1</b>	
<b>Awareness raising and community capacity to respond to LGBT hate incidents</b>	
Actions	
1.1	Increase knowledge about LGBT hate incidents through provision of information and resources targeting family, friends and communities, and through workshops, meetings and outreach work.
1.2	Support the development of specialist groups amongst different communities.
1.3	Support the development of community-led awareness raising of LGBT hate crimes and incidents through professional and community engagement and outreach programmes.
1.4	Support the development of community-led outreach work on LGBT hate crimes and incidents with young people and identified marginalised individuals from communities at risk
1.5	Work closely with transgender groups to improve reporting of transphobic crime and the impact of transphobic abuse of all types.
1.6	Build new working partnerships each year, in a sustainable model to ensure both reengagement with the democratic process and inclusion of community safety elements in partnership working.
<b>Area of work 2</b>	
<b>Directional and comprehensive communications</b>	
Actions	
2.1	Develop a sustained city-wide media and communications strategy to deliver universal and targeted awareness campaigns targeting perpetrators; survivors; young people and the public
2.2	Minimum standards for all agencies to publicise LGBT hate crime and incidents, the help available, and how agencies can respond, accompanied by creating safe environments to encourage reporting.
2.3	Workplace homo, bi & transphobia policies and campaigns (informed by national best practice toolkits) to be developed and implemented across the public and community and voluntary sector
2.4	Development of positive awareness campaign for visitors to the city in partnership with local businesses and transport providers.
<b>Area of work 3</b>	
<b>Work with younger LGBT people around safety and bullying</b>	
Actions	
3.1	Ensure services that work with children, young people, and families deliver best practice work that incorporate LGBT hate crime and transphobia awareness as part of service delivery.
3.2	Support a whole school approach to LGBT anti-bullying across schools in Brighton & Hove (informed by evaluated best practice)

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<b>Area of work 4</b>
<b>Improve consistency and clarity in the monitoring of LGBT hate incidents</b>
<b>Actions</b>
4.1 Consistent and practical data standards to underpin analysis and performance management by commissioners, NHS and third sector providers.
4.2 Compliance with statutory and legislative requirements in relation to LGBT hate crime recording.
4.3 Development of partnership-wide agreed standards of recording of homophobic, biphobic and transphobic hate crime and incidents.
<b>Area of work 5</b>
<b>Increased reporting and improved responses and services to those reporting</b>
<b>Actions</b>
5.1 Develop, distribute widely, and mainstream the use of the LGBT Hate Crime Reporting Form to increase reporting of incidents.
5.2 Expand web-based and on-line reporting opportunities.
5.3 Working with the newly convened community city LGBT Community Safety Forum and LGBT HIP (Health Improvement Project), develop robust baseline indicators to measure levels of trust and confidence.
5.4 Increase reporting in the community, voluntary and statutory sector.
5.5 Enhance facilities to report and access services within neighbourhoods
5.6 Conduct client satisfaction surveys and act on feedback from the client in relation to the standards of service provided to them.
5.7 Deliver a consistently high quality service to victims from wherever they access support. Prioritise work with repeat victims to support and protect them and their families from further victimisation.
5.8 Publicise reporting centres, reporting schemes and support services.
5.9 Increase reporting from vulnerable groups & provide targeted publicity and support to raise awareness about reporting and enable easy access to hate crime services.
5.10 Ensure clients are aware of statutory sector complaint procedures eg. Council, Police, NHS, CPS, Probation and learn from complaints made.
<b>Area of work 6</b>
<b>Prevention and deterrence of offending</b>
<b>Actions</b>
6.1 Review policies and practices relating to the recording and referral of issues relating to repeat offenders.
6.2 Monitor records to ensure early identification and tagging of LGBT hate motivated incidents.
6.3 Monitor the LGBT hate reporting process within Sussex Police and the Crown Prosecution Service to identify gaps in the system and develop a plan to address them.
6.4 Develop and monitor tracking of criminal cases to check progress and provide feedback to the victims and communities.
6.5 Map and analyse hotspots for LGBT hate crime and incidents to assist in problem solving and to assess the effectiveness of work undertaken.



## LGBT Hate Incidents and Crimes

6.6 Develop and support city-wide centralised monitoring system of LGBT hate crimes and incidents, produce regular updates on trends and patterns for monitoring to direct future preventative and development work.

### Area of work 7

**Targeted initiatives which aim to increase the safety of those vulnerable to particular risks and which contribute to the wider aims and objectives within the Strategy**

#### Actions

7.1 Housing Management to continue to develop appropriate and specific housing policies and procedures and work with registered social landlords and the private sector to minimise potential risk of vulnerable people from LGBT communities being housed in unsuitable locations.

7.2 Housing to ensure consistent response to all reports of LGBT hate crime and incidents.

7.3 Targeted domestic violence resources for lesbians, gay men, bisexual and trans people continue to be distributed by the community safety team.

### Area of work 8

**Develop community cohesion and engagement**

#### Actions

8.1 Develop links with external agencies/individuals from around the UK to bring inspiration and expertise to local LGBT communities.

8.2 Judge and respond positively to emerging tensions and potential conflicts.

8.3 Statutory providers to consult and engage with LGBT communities in developing good practice of priorities and services with regard to LGBT hate motivated crimes and incidents and other services.

8.4 Develop links with other minority communities in the city and support the LGBT community to share their expertise & learn from the experiences of other marginalised communities.

### Area of work 9

**Support LGBT sexual assault victims and LGBT people at risk of sexual exploitation**

#### Actions

9.1 Work in partnership with the LGBT Sexual Exploitation Working Group and partner agencies to support and develop services available to LGBT victims.

## Disability Motivated Incidents and Crimes

**Outcome:** A reduction in disability hate incidents and crimes and in the harm caused to the individuals and communities.

**Sub-outcomes:**

- There is increased reporting of disability hate incidents from all disabled people, from at risk and marginalised groups, and from carers
- There is a reduction in repeat victimisation and repeat offending
- There are improved outcomes for victims and witnesses
- There is improved trust and confidence of disabled people, their carers, and organisations supporting disabled people

**Definition:**

Disability hate incidents are defined as: *‘Any incident which is perceived by the victim or any other person, to be motivated by a hostility or prejudice based on a person’s disability or perceived disability.’*

The definition also includes incidents that occur through association with a disabled person, for example, where family members or carers are targeted due to their link with a disabled person; and where an incident is perpetrated on someone presuming that they are disabled.

The social model of disability distinguishes between ‘impairment’ (functional limitations of the mind, body or senses) and ‘disability’ (disadvantage or restrictions of activity placed by the society). A key concept of the social model is that society disables people by the way things are arranged. Organise things differently, and people are enabled – although the impairment hasn’t changed.

Disabled people include:

- people with physical disabilities or who find it difficult to move around
- people with sensory disabilities or who cannot hear or see, or who find it difficult to hear or see
- people with a learning disability
- people with mental health illness, and
- people with long term conditions.

### Why this is a priority

National evidence shows that targeting and harassment of disabled people is a serious issue, there is significant under-reporting, reported incidents are not appropriately recorded, and a culture of disbelief surrounds disability hate incidents. Disabled people are more likely to fear for their safety, are more likely to experience hate incidents and crimes and they are less likely to report it. It remains an important priority both locally and nationally.

Hate incidents can have a disproportionate impact on disabled people's daily lives, threaten their sense of wellbeing, and increase fear of crime. They often restructure their lives to minimise risk: they avoid going to particular places, change their routines, move homes, transfer schools, and some change their jobs. Many come to accept it as 'inevitable' or 'part of life'; this in turn inhibits people from reporting hate incidents, seeking support and redress. Under-reporting of incidents also means that actions are not taken to address disabled

people's needs and concerns and this has a significant impact on social inclusion, opportunities and freedom for all disabled people. The impact is wider still, as incidents also impact on family members, carers and cumulatively on other disabled people.

Certain types of disabled people experience increased risk and victimisation. People with learning disabilities and/or mental health conditions have increased risk of hate incidents and experience higher levels of victimisation. Similarly, people with visible disabilities and those with an Autism Spectrum Condition are also at an increased risk.

Disabled people may be targeted because of their other identities (for instance: ethnicity, faith, sexual orientation) or due to their age and gender. Disabled people may therefore experience incidents due to an intersection/ overlap of identities resulting in multiple-discrimination or compounding of harm. For example, a disabled person may be targeted due to their age and ethnic background. An accumulation of risks factors, for example, having learning disability, being South Asian, being LGBT, living in social housing or in a deprived area, heightens the likelihood of victimisation. Different identities interact in highly complex ways with demographic and situational characteristics to increase risk of hate incidents and harm caused.

Disabled people can experience hate incidents in the context of other abuse in domestic or residential care settings. Perpetrators can be 'friends' or 'carers', and people with learning disabilities are often 'befriended' by the perpetrators. Neighbours may be amongst those who harass people with mental health issues. The relationship between the victim and the perpetrator (including the power relationship) and a fear of reprisal may deter reporting of hate incidents. Criminal justice responses and satisfaction with the system have also been identified as barriers to reporting.

### Main Partners

Advocacy groups of disabled people  
Adult Social Care  
Learning Disability Partnership Board  
Sussex Police  
Partnership Community Safety Team  
NHS Trusts  
Children, Youth and Families Services  
Social housing providers  
Crown Prosecution Service  
HM Court services  
Voluntary organisations supporting disabled people  
Local Safeguarding Boards

### Current context

The national context surrounding hate incidents and crimes in general is described on page 88. With regards to disability hate incidents specifically, Crown Prosecution

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Service guidance (March 2010) distinguishes between hostility and vulnerability; disabled people are not inherently vulnerable, it is circumstances that make them vulnerable and can provide opportunity for an offender to demonstrate hostility based on disability. The investigation and prosecution focus therefore needs to enforce disabled victims' rights and scrutinise the offender's behaviour.

Responding to the Winterbourne View case, in spring 2012 the government plans to set out measures in a cross government disability strategy to improve the protection of people with learning difficulties in care. Also, a disability hate crime action plan will be developed to respond to the Equality and Human Rights Commission's inquiry into disability related harassment. The government's action plan to tackle hate crime *Challenge it, Report it, Stop it*, has several specific actions to enhance sentencing for disability hate murders, to assess the need for new specific offences similar to racially or religiously aggravated offences, and to assess if there is a case for changing the law on incitement to hatred on the grounds of disability.

Legislation and policy emphasise a human rights based approach to working with disabled people, and describe the support people should get to enact their rights, including right to complain, enjoy equal opportunities, dignity, and respect. This has been adopted locally and our work aims to improve outcomes in terms of social inclusion, empowerment (greater choice and control) and equality for disabled people, people with learning disabilities and autism, their families and their carers. Further, the use of public sector equality duties to foster good relations, challenge negative attitude and promote positive attitude towards disabled people is encouraged by the government.

There is limited evidence on the nature and extent of hate incidents locally. Changes to reporting and monitoring systems have constrained our ability to build the evidence base, monitor and disaggregate information on disability hate incidents and we are seeking improvement in these areas. Despite a local publicity campaign, very low numbers (33 in 2010/11 and 23 in 2011/12 up to December) of disability hate incidents were recorded on the central database in the city. Additionally, schools and the Safeguarding Adults Board recorded a number of bullying and discriminatory abuses respectively. Sussex Police and the Crown Prosecution Service also have disability hate crime monitoring schemes, but very low numbers of disability hate crimes are recorded on the police database (9 recorded since April 2009 to date), while ten successful prosecutions (out of 12) were recorded by the CPS for Brighton & Hove from 2009/10 to date. Both in terms of numbers of cases and case outcomes, disability hate incidents are a serious challenge. Local consultation with disabled people and support organisations identified the following priorities: improved safety for people with learning disability in the community; hate incidents and safety of disabled people on the public transport; and increased awareness amongst public, disabled people and staff of the public services of disability hate incidents.

Increased reporting of disability hate incidents and the provision of a flexible and responsive casework service remains a high priority. To empower victims and communities through developing accessible information, we launched a publicity campaign with the involvement of disabled people to increase public awareness and reduce social tolerance of hate incidents. In partnership with advocacy and support organisations of disabled people, we have created third party reporting centres to increase accessibility. Risk-assessment tools have been trialled in the city to identify risk and harm to the victims, and a multi-agency case management system and risk assessment conferences are being used to deliver improved responses to high risk victims. Sussex Police have introduced new policies, procedures and training, to improve recognition, recording of and response to disability hate incidents. We continue

to develop effective partnership responses to support victims city-wide (for example, protocols to protect vulnerable victims), integrate safeguarding work with the reporting of hate incidents, and disseminate good practice through training. Dedicated resources (police disability liaison officers and victim witness caseworker for people with learning disability from INTERACT) extend our reach, break down barriers, and increase capacity to support victims.

### Community engagement, trust and confidence

The Safe in the City Partnership facilitates a Disability Hate Incident Steering Group that includes disabled people, their carers, and support organisations, thus enabling ongoing engagement and consultation. This group oversees the Strategy and progress on actions, scrutinises data levels and trends of incidents, and helps plan and deliver our work programme. The Learning Disability Partnership Board and its working groups are regularly consulted and receive performance and monitoring reports. We will continue to develop our community engagement processes outside of the steering group and build stronger relationships with disabled people, their carers and organisations supporting them to improve trust and confidence. We will continue to deliver outreach work to disabled people and their carers to understand and respond to their safety concerns. Tackling disability hate incidents is identified as a high priority by the community in maintaining trust and confidence.

Nationally, the Department of Work and Pensions estimates that around one in twenty children are disabled, compared to around one in seven working age adults and almost one in two people over state-pension age. We also know that many young disabled people live with and are cared for by their elderly family members and may either be reporting hate incidents for the disabled people or may themselves be targeted due to their association with a disabled person. Reducing disability hate incidents will increase engagement with and impact on services for older people and carers in the city.

### Where next?

We are committed to reducing hate incidents and crimes and the harm caused to individuals and communities, and it is vital that we close the gap of under-reporting, and encourage reporting from at risk and marginalised groups. Only by increasing reporting can we gain a better understanding of the extent of hate incidents and crimes so we can bring the perpetrators to justice, support victims and communities better and improve outcomes. Our key priorities for the next year include: a review of publicity work and assessing its impact on reporting levels; progress work to tackle hate incidents on public transport; continue to raise awareness among disabled people on how to report and get support; develop a methodology to assess victims feeling of safety and support provided; research victims' experiences of reporting hate incidents; and monitor the impact and effectiveness of changes to partnership reporting and monitoring systems, and the application of risk management principles to hate incidents and adjust services if required.

### Parallel plans

- |   |  |
|---|--|
| • Fulfilling & Rewarding Lives: the Strategy for Adults with Autism in England, 2010        | • Brighton & Hove's Equality and Inclusion Policy  |
| • Government's White paper: Valuing People (March 2001) & Valuing People Now (January 2009) | • Challenge it, Report it, Stop it. The Government's Action Plan on Hate Crime, March 2012 |
| • No Secrets – Department of Health and Home office statutory Guidance (2000)               | • National DCSF guidance: 'Safe to Learn'  |
| • Brighton & Hove Multi-agency Carers'  | • Safeguarding Adults Board Plan 2011 -  |

## Key performance indicators

- No. of disability hate incidents recorded including those reported by at risk groups
- Number of police recorded incidents and crimes
- Percentage of police recorded crimes detected/solved
- Percentage of finalised prosecutions resulting in a conviction
- Number of repeat victims
- No. or % of victims who feel that their safety has increased, harm has reduced and who feel supported
- No of (effective) interventions with the offenders of disability hate incidents

## Disability Hate Incidents and Crimes Action Plan

### Area of work 1

**Increased reporting of disability hate incidents and crimes from all disabled people, including people with learning disabilities, autism, their carers, and others by developing a range of options to make reporting accessible to all.**

### Actions

1.1 Promote greater reporting and consistent recording of disability hate incidents from statutory, voluntary and community sector organisations. Improve identification of hate incidents within the Safeguarding Adults At Risk (SAAR) procedures and anti-social behaviour reporting. Statutory partners should integrate equality considerations in commissioning contracts and allocating funding that will promote reporting and tackling of all hate incidents by those contracted or funded. Mainstream reporting mechanisms amongst the partner agencies and communities.

1.2 Develop and distribute reporting mechanisms suitable to the needs of people with visual impairments to increase reporting of disability hate incidents.

1.3 Target distribution of easy read self-reporting form for people with learning disabilities to complete with support from carers / staff.

1.4. Enhance facilities to report and access services by creating reporting centres in the statutory, community and voluntary sector with particular focus on organisations supporting disabled people and their carers.

1.5 Review and adjust easy to read and accessible publicity material to inform people about reporting schemes, reporting centres, and support services. Target publicity and support to organisations working with disabled people and their carers. Review web-based information for accessibility and implement changes according to feedback.

1.6 Increase reporting from marginalised and vulnerable groups within the disabled population through joint work with the Migrant and Refugee Forum, Lesbian, Gay, Bisexual, trans communities, and the Racial Harassment Forum. For instance, engage with and increase reporting from disabled people including people with learning disabilities and autism from the refugee, asylum seeker, LGBT, Black and Minority Ethnic communities, disabled people with mental health issues and people with compound or multiple disabilities.

1.7 Work with transport providers and partners to improve reporting and recording of disability hate incidents on public transport, assess the extent and improve responses.



## Disability Hate Incidents

1.8 Translate information and make it widely available, including in public places.	
<b>Area of work 2</b>	
<b>Deliver improved responses, casework support and services to those reporting disability hate incidents by working in partnership with key agencies to reduce the harm caused.</b>	
<b>Actions</b>	
2.1 Deliver a consistent high quality casework service to those reporting incidents; provide a second tier of intervention and support to victims of: critical incidents, cases that have a high community impact, cases that are significant to sustaining the victims and communities confidence in the public services, and where there is an identified gap or unmet need.	
2.2 Further develop and test suitability of the risk assessment tools vis-à-vis victims of disability hate incidents, and monitor numbers. Prioritise work with repeat victims (people who have reported more than one incident in any 12 month period) to support them and prevent further victimisation. Prioritise work with high risk victims to reduce risk and harm caused.	
2.3 Further develop the multi-agency risk assessment conference to improve the response to high risk, vulnerable and intimidated victims and witnesses of disability hate incidents, to take enforcement action against the persistent offenders, and monitor numbers. Build up membership from organisations working with disabled people.	
2.4 Routinely ask those reporting disability hate incidents for their feedback regarding services and respond accordingly to improve standard of services. Develop evaluation systems that will enable the services to measure the improvement in outcomes: increased feelings of safety, reduction in harm, incidents are prevented from escalation, and people feel supported etc. Undertake small research into victims experiences of reporting disability hate incidents and adjust services according to findings.	
2.5 Ensure clients are aware of statutory sector complaint procedures; for instance, ensure that the Council, Police, NHS, CPS complaint procedures are accessible (available in easy read format) and learn from complaints made.	
2.6 Deliver a rolling programme of training to key statutory, voluntary and community agencies including staff from day centres, supported housing, social care, health care and organisations working with disabled people, people with learning disabilities and autism. The training programme will raise awareness and improve recognition of all hate incidents including disability hate incidents, mainstream the use of reporting forms and clarify referral pathways and effective interventions, and link organisations to the multi-agency risk assessment conference (MARAC). We will seek to involve disabled people in training wherever possible.	
2.7 Review, build on and mainstream learning from national and local research to ensure best practice.	
2.8 Safeguarding Procedure to incorporate hate crime practice guidance, including analysis and provision of training to the relevant staff.	
<b>Area of work 3</b>	
<b>Effective monitoring systems to develop crime reduction strategies and improved accountability / reporting to the disabled people and their organisations.</b>	
<b>Actions</b>	
3.1 Develop and maintain a city-wide monitoring system of disability hate incidents. Through this data we will be able to build a better picture, identify how big the problem is, and what we need to do to tackle this problem.	
3.2 Produce regular reports on levels, trends and patterns of disability hate incidents and distribute them to the relevant forums including the Disability Hate Incident Steering Group, and Learning Disability Partnership Board as well as make the report available on our website. This monitoring data will enable us to direct future prevention and development work.	

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3.3 Map and analyse hotspots for disability hate incidents to assist in problem solving, to assess the effectiveness of work undertaken, and to target resources appropriately.	
3.4 Housing (in partnership with other social landlords) to develop appropriate policies and procedures to minimise potential risk of housing/placing disabled people and at risk groups such as people with learning disabilities in vulnerable locations.	
<b>Area of work 4</b>	
<b>Prevent and deter offenders, bring offenders to justice wherever possible and reduce re-offending through improved rates of detection, prosecution and effective court outcomes</b>	
<b>Actions</b>	
4.1 To monitor police and other criminal justice agency records to ensure early identification and tagging of disability hate incidents, improved first response and quality of investigation. Monitor and assess the effectiveness of new procedures and training, and implement changes accordingly.	
4.2 Monitor and increase the number of disability hate crimes recorded and detected along with the number of arrests, cautions, prosecutions and convictions. Increase the number of successful prosecutions and reduce the number of discontinued cases. Monitor the use of special measures to the victims of disability hate incidents. Monitor the sentence uplift (use of section 146 of the CJA) in the courts.	
4.3 Work towards developing early intervention programmes with young people in young people's settings.	
4.4 Develop a mechanism to identify and manage risk presented by offenders persistently targeting disabled people.	
4.5 Develop and monitor tracking of criminal cases to check progress and provide feedback to victims and communities.	
4.6 Work with perpetrators and their families to address their prejudices against disabled people by effective interventions and referral to appropriate services.	
<b>Area of work 5</b>	
<b>Increased public awareness and improved understanding of hate incidents against disabled people</b>	
<b>Actions</b>	
5.1 Review and adjust the city-wide publicity campaign relating to disability hate incidents and assess its impact on the level of reported incidents. Promote greater understanding of hate incidents against at risk groups such as people with learning disabilities, and people with mental health illness in Brighton & Hove.	
5.2 Continue to distribute easy to read information and posters targeting the general public, as well as specifically targeting people with learning disabilities and other at risk groups. Translate the information and make it available in different formats.	
5.3 The Partnership Community Safety Team and statutory partners of the Safe in the City Partnership to regularly consult and engage with disabled people, their carers and organisations working with disabled people in developing priorities and services. Continue to facilitate the Disability Hate Incident Steering Group.	
5.4 Address safety concerns of disabled people and raise awareness of risks, reporting mechanisms and support available.	
5.5 Prioritise promotion of clear and consistent disabled friendly messages and raise awareness of disability hate incidents in young people's settings using a variety of young person friendly media and training.	



## Older People

### Outcome: Older people feel safer and are at less risk of victimisation

#### Sub-outcomes:

- Older people feel safer
- Older people are at less risk of victimisation of crime and anti-social behaviour
- Services are more responsive to the needs of older people
- Older people know about services available and can access them

#### Definition:

For the purpose of this Strategy, older people are defined as those aged 50 or above.

#### Why this is a priority

Locally and nationally, we know that despite lower levels of victimisation for most crime types, older people have a disproportionately high fear of crime. This can have a debilitating effect on older people, and impact upon their quality of life and ability to participate fully in society. Furthermore, when older people, and particularly those who are vulnerable, do experience crime and anti-social behaviour, the effect on their mental and physical wellbeing may be greater than it is for those from younger age groups.

National population estimates (2010) show that there are 74,500 people aged 50 or over living in Brighton and Hove, making up 29% of the population. The size of the 50 and over population in the city is projected to increase to about 85,000 by 2020, underlining the need to address community safety concerns for people in this age group.

Local analysis of crimes against older people shows that although this group are less likely overall to be victims of crime, older people are over-represented amongst victims of particular crimes, such as distraction burglary. Elder abuse, defined as a 'single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an older person', is also a significant community safety issue for older people. This also includes abuse which occurs between family members, partners or ex-partners and is considered domestic violence.

The Citizens Panel survey in 2010 found that there was not much difference across all age groups in how safe people felt in their neighbourhoods or in the city centre during the day. However, after dark, people tended to feel less safe as they got older. In particular, older women report feeling less safe than

#### Main Partners

Older People's Council  
Age Concern  
Social Housing Providers  
Adult Social Care  
Trading Standards  
Partnership Community Safety Team  
Sussex Police  
Neighbourhood Care Scheme  
RISE

## **Community Safety, Crime Reduction and Drugs Strategy 2011-14**

older men at night, both in their local neighbourhoods and also in the city centre. Factors such as disability and limiting long-term illness can also affect older people's feelings of safety.

### **Current context**

Following a scrutiny review into older people and community safety in August 2009, the Environment and Community Safety, Overview and Scrutiny Committee recommended that the particular needs of older people feature more prominently in the Community Safety, Crime Reduction and Drugs Strategy. Although some work around older people and community safety has previously been carried out as part of other strategy priority areas within our earlier Strategy documents, this dedicated older people priority area and action plan, which draws together and builds on previous work, is a new theme in our 2011-14 Strategy.

### **Where next?**

The Older People Action Plan organises the recommendations of the Community Safety Overview and Scrutiny Committee into four main areas of work. These include providing more information to older people about community safety issues, and enabling greater access to services; establishing better support networks and social structures for older people (with a view to decreasing isolation and improving feelings of safety); improving the information which services have about the needs of older people; and better co-ordination of existing services for older people. This will be new work for the Safe in the City Partnership during the period of this Strategy. We will be working closely with Adult Social Care, social housing providers and other specialist services to integrate safety initiatives within those services. Where appropriate, joint working will be undertaken within the oversight and approval of the Adult Safeguarding Board.

### **Links to other priority areas**

Work with older people links to a number of other areas in this Community Safety Strategy. Improving feelings of safety, and reducing fear of crime amongst older people ties in closely with the physical environment, infrastructure and quality of life strategy area. Improving reporting by older people and awareness of services, particularly amongst minority or excluded groups, links into the hate crime and incidents priority area, as well as the domestic violence priority area.

Work with older people around community safety issues also links to the alcohol misuse strategy area, as a large proportion of violent crimes committed by older people occur whilst under the influence. Responding to crime and disorder issues related to alcohol misuse, as well as diversifying the night-time economy can have a positive impact on older people's feelings of safety, particularly in the city centre at night.

This area of work also contributes to a number of the eight priorities in the Brighton and Hove Sustainable Community Strategy, such as: reducing crime and improving safety; improving health and wellbeing; strengthening communities and involving people; and providing quality advice and information services.

### **Implications for equalities and sustainability**

The full and active role of all older residents in the city is essential to the social, economic and environmental sustainability and wellbeing of Brighton and Hove. In order to achieve this, both the inequalities caused by older people's victimisation in relation to crime and anti-social behaviour, and those created by older people's fear of victimisation, must be addressed. Intergenerational initiatives, for example, will enable greater understanding between those of different age groups, promoting greater community cohesion and building resilience and feelings of safety amongst older

people. Greater feelings of safety will mean that all older people, including minority or excluded groups, feel more able to participate fully, and equally in the social and economic life of the city.

### Parallel plans

- Revised Dementia Planning Framework 2010 -2013
- Alcohol Programme Board Commissioning & Action Plan
- Healthy Ageing Sub-Network: Development Programme
- Annual Report of the Director of Public Health: 2009.
- Adult Safeguarding Board: Action Plan
- Older People's Housing Strategy

### Key performance indicators

- Total crime (per 1,000 pop) against older people
- No. of distraction burglaries against older people
- % of older people who had reported an experienced or observed crime to the police
- % of older people who feel safe in their local neighbourhoods and the city centre during the day and after dark
- Consultation with older people to find out if services are responsive to needs

Older People Action Plan
Area of work 1
Information for older people and access to services
Actions
1.1 Produce and disseminate a purpose designed booklet to engage and inform older people on community safety issues, with specific information around domestic violence/elder abuse and cold-calling/ distraction burglary. Promote and supply 'uninvited warning' stickers (through Trading Standards)
1.2 The Alcohol Programme Board to target campaigns and interventions to those most at risk within the older population to reduce consumption and the harm caused by drinking to excess
1.2 Initiatives which encourage older people to report crimes and incidents they have experienced to the police and Partnership Community Safety Team
1.3 Reporting arrangements for racist/religiously motivated crimes and incidents by older victims of racial harassment to be extended to other vulnerable older victims of hate incidents, including LGBT and disabled older people
1.4 Implement good practice casework standards which risk assess needs of vulnerable victims and provide support throughout the process, liaising with Adult Social Care where appropriate
Area of work 2
Support networks and social structures for older people
Actions

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2.1 Establish further inter-generational initiatives, promoting a better understanding between age groups, and building resilience and feelings of safety amongst older people.
2.2 Create a diverse night-time economy which is inclusive of older people and allows older people to feel safer in the city centre at night.
2.3 Encourage licensed and unlicensed venues to offer good-value daytime activities for older people, maintaining social networks and decreasing feelings of isolation and fear of crime.
2.4 Support, and where possible mainstream, programmes shown to be successful in working with isolated vulnerable older people, eg. the Neighbourhood Care Scheme
2.5 Housing to consider prioritising wherever possible, moving older people near to family or friends where support would be available nearby.
<b>Area of work 3</b>
<b>Better information to services</b>
<b>Actions</b>
3.1 Carry out further consultation and analysis on older people's specific concerns about community safety, using the Community Engagement Framework.
3.2 Additional research and analysis, including with service users, on the extent and nature of domestic violence involving older people and elder abuse, to help further develop preventative and support services.
3.3 Where possible consistent data for issues such as alcohol-related harm and domestic violence be distinguished by age, gender, ethnicity, disability and sexuality for vulnerable older people.
3.4 Extend the council's Customer Relationship Management system to include vulnerable older people
3.5 Older People's Council to nominate an older person to serve on the Sussex Police Independent Advisory Group
3.6 The ECSOSC to monitor the implementation of the recommendations of the Scrutiny Panel, and add community safety work regarding minority older groups to its work programme
3.7 Wide consultation with older people on policies and strategies of the council and partner organisations as well as inclusion of older people in Equalities Impact Assessments to help eliminate or minimise adverse impact on the quality of life of older people and their ability to interact fully in society.
<b>Area of work 4</b>
<b>Better co-ordination of, and improvement of existing services</b>
<b>Actions</b>
4.1 Regular training be further developed for every professional carer and volunteer working with older people in looking for early signs of elder abuse and domestic violence
4.2 Operational protocols between agencies regarding elder abuse in cases of mental illness be referred to the Select Committee on Dementia
4.3 Trading standards to consider introduction of 'no cold-calling' zones in areas identified by intelligence
4.4 Equality Impact Assessments to review policies and procedures for their effectiveness in meeting the needs of older people

## Appendix 1. Summary of Planned Expenditure

The following table provides a breakdown of Partnership expenditure during 2012/13. This includes partnership funding allocated by the Safe in the City Partnership, but does not include the costs of other community safety and crime reduction work where it are funded as part of the core business of individual agencies, or where the budget comes from another source.

### Safe in the City Partnership planned expenditure, 2012/13 (£)

Area of work	Staff costs	Projects and Initiatives	Total
Community Safety Partnership (partnership support, management, research, monitoring, finance, rent, etc.)	414,920	0	<b>414,920</b>
Drugs misuse (Drugs Intervention Programme and outreach)	68,830	0	<b>68,830</b>
Community Safety Community Projects (substance misuse and environment improvements)	319,430	8,920	<b>328,350</b>
Operation Reduction (drugs enforcement and outreach)	126,000	0	<b>126,000</b>
Street drinking and begging enforcement and outreach	60,000	0	<b>60,000</b>
ASB and Hate Incident Casework Team	392,120	0	<b>392,120</b>
Hate incidents, targeted community engagement and preventing extremism	176,930	45,020	<b>221,950</b>
Family Intervention Project	464,560	38,410	<b>502,970</b>
Youth offending, youth support, alcohol misuse	163,870	0	<b>163,870</b>
Sexual Violence and Abuse (SARC, counselling and ISVA services for victims)	96,150	0	<b>96,150</b>
Domestic Violence:			
Services for victims (RISE incl. IDVAs, and MARAC)	411,620	0	<b>411,620</b>
Perpetrator programme (Living With Violence)	113,290	0	<b>113,290</b>
<b>Total</b>	<b>2,807,720</b>	<b>92,350</b>	<b>2,900,070</b>

## Appendix 2. About the Partnership

The Crime and Disorder Act 1998 specifies that community safety strategies must be carried out through Community Safety Partnerships. The 'responsible authorities' who are required by legislation to participate in our Safe in the City Partnership are: Sussex Police Authority; Surrey and Sussex Probation Trust; East Sussex Fire and Rescue Service; Brighton & Hove Police Division; NHS Brighton & Hove and Sussex Partnership Trust; and Brighton & Hove City Council. However, many other partners from the statutory, community/voluntary and business sectors are fully involved in the Partnership's work. Local residents also play a key role.

### Brighton & Hove Safe in the City Partnership Structure



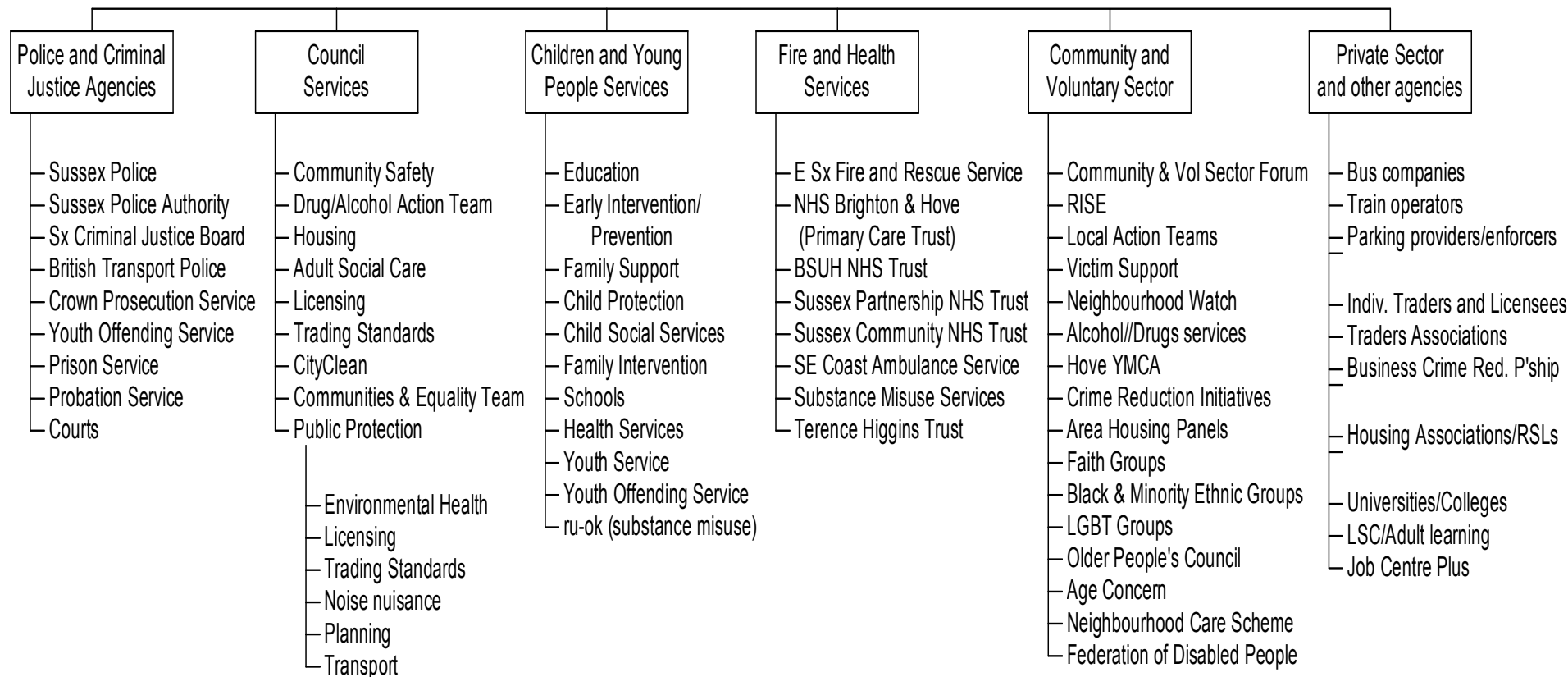
The diagram above provides a basic chart showing the way in which the Safe in the City Partnership is structured. The Safe in the City Partnership Board has overall responsibility for the work of the Partnership, while the individual priority areas within this strategy are supported by multi-agency working groups made up of specialists in the relevant area. In some areas there are also dedicated staff to drive forward the work.

A network of Local Action Teams cover the city and these are an important part of the Partnership. These involve residents, local businesses and agencies working together and they provide a key route through which community safety issues for local neighbourhoods are taken forward.

The Safe in the City Partnership links with the democratic process through the Community Safety Forum which reports directly to the Policy and Resources Committee. During 2012, further changes will be made to the structure of partnership working, to reflect changes in the council's committee system and the new relationship with the Police and Crime Commissioner and Panel. Revised details will appear on the partnership's website [www.safeinthecity.info](http://www.safeinthecity.info) when available.

The diagram below shows the different service sectors with whom we work in partnership and lists the main partners involved.

## Partner Agencies



There is more detail about the Partnership and how it functions on our website [www.safeinthecity.info](http://www.safeinthecity.info)



## Appendix 3. Lead Officers for Strategy Priority Areas

Priority Area	Commissioner Lead	Senior Delivery Lead	Officer Lead	Steering Groups, etc.
Physical Environment, Infrastructure and Quality of Life	Linda Beanlands	Matt Easteal		Safer Streets Task Group
Drugs Misuse	Kathy Caley	Graham Stevens		Communities and Families Steering Group Health Protection Steering Group Joint Commissioning Group Treatment Performance Group
Alcohol Misuse	Kathy Caley	Kate Lawson (Prevention) Tim Nichols/Linda Beanlands (Availability) Simon Nelson/Steve Barton (Night Time Economy) Graham Stevens/Kate Lawson (Treatment etc.)		Alcohol Programme Board 4 Strategy Domain Groups
Anti-Social Behaviour	Linda Beanlands	Aaron Devereaux		ASB Steering Group
Reducing Reoffending	Linda Beanlands Leighe Rogers Supt. Steve Whitton	Martin Edwards Supt Steve Whitton		IOM Management Board
Children, Young People and Families	Steve Barton Kerry Clarke Linda Beanlands	James Dougan Debbie Corbridge (FIP)		Youth Justice Steering Group FIP Steering Group Troubled Families Steering Group
Domestic Violence	Linda Beanlands	Supt. Nev Kemp; DCI Jez Graves; Leighe Rogers; Steve Barton; Denise D'Souza; Paula Murray; Jugal Sharma; Lydie Lawrence	Eleri Butler	DV Intelligent Commissioning Group Domestic Violence Forum
Sexual Violence and Abuse	Linda Beanlands	Sgt Peter Castleton; DCI Jez Graves; Lucy Bryson	Eleri Butler	Sexual Violence Reference Group Rape and Serious Sexual Offences Management Group SARC Board
Racist and Religiously Motivated Incidents and Crimes	Linda Beanlands	Nahida Shaikh; Aaron Devereaux		Racial Harassment Forum
Building Resilience to Violent Extremism	Linda Beanlands	Nahida Shaikh	Haroon Khalil	Prevent Steering Group
LGBT Hate Incidents and Crimes	Linda Beanlands	Sgt Peter Castleton	Eric Page	to be confirmed
Disability Hate Incidents and Crimes	Linda Beanlands	Nahida Shaikh; Aaron Devereaux		Disability Hate Incident Steering Group
Older People	Michelle Jenkins	Linda Beanlands; Nahida Shaikh		



## Appendix 4. Summary of key performance indicators

### All Crime and Disorder

- No. of total police recorded crimes
- No. of total police recorded anti-social behaviour incidents

### Physical Environment, Infrastructure and Quality of Life

- % of people feeling safe in their neighbourhood and in the city centre both in the daytime and after dark
- % of people who believe that the police and partners are dealing with issues that matter in their local area
- % of roads with unsatisfactory levels of graffiti and litter
- Number of police recorded criminal damage offences

### Drugs Misuse

- Number of drug related deaths (maximum 38 per year 2012-14)
- Number of drug users 18 years or over in effective treatment (1.5% increase)
- Percentage of people 18 or over leaving treatment who do so in a planned way (50%)
- Percentage of people 18 or over who have been in treatment over four years (25%)
- Percentage of successful completions: planned exits as a proportion of the total treatment population
- Percentage of people in treatment who overcome dependency and do not re-present for treatment within six months
- Number of Key Stage 4 school students reporting drug use in annual the Safe and Well School Survey.
- Number of under 18s who leave treatment in a planned way.
- Percentage of successful completions: planned exits as a proportion of the total treatment population for under 18s.

### Alcohol Misuse and Alcohol-related Crime and Disorder (tbc)

- Percentage of patients leaving alcohol treatment who completed successfully (no longer requiring structured alcohol treatment) – 50%
- No. of alcohol related hospital admissions/1000 population – 2665 per 100,000

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population (2% lower growth relative to trend)

- Percentage of successful completions (planned exits as a proportion of the treatment population)
- Percentage of those in treatment who overcome dependency and do not re-present to treatment within six months.
- Number of police-recorded assaults with injury
- The percentage of people who believe that drunk and rowdy behaviour is a problem

### **Anti-Social Behaviour**

- A comprehensive range of performance management and quality assurance measures are developed.
- The number of police recorded incidents of anti-social behaviour.
- Public confidence in police and local council are dealing with anti-social behaviour and crime issues
- Percentage of people who think that ASB is a problem in their local area

### **Reducing Re-offending**

- Adult proven reoffending rate (based on 12 month rolling cohort)
- Reoffending by PPOs (previously NI30) – number of re-offences from those in cohort over 12 months
- Youth proven reoffending rate (based on 12 month rolling cohort)
- Successful completion of statutory offenders
- Successful engagement of non-statutory offenders
- Accommodation status at termination of order/licence
- In employment, training or education at termination of order/licence

### **Children, Young People and Families**

- Number of children/young people entering the care system
- The numbers of first time entrants to the criminal justice system
- The percentage of YOT offenders who re-offend in a 12 month period
- The number of young people within the criminal justice system receiving a conviction in court who are sentenced to custody
- Number of Key Stage 4 school students reporting that had 'ever taken drugs that were not prescribed for you or available at a chemist'.
- Planned exits from substance misuse treatment as a proportion of the total

treatment population for under 18s

- Number of vulnerable young people screened for substance misuse across youth services, hostels, social care and CAMHs
- EET amongst young people engaged in YOT / substance misuse treatment
- Youth Crime prevention compared to general youth population.
- % of families and referring agencies who feel that the situation with the family has improved as a result of the work of the Family Intervention Project
- Percent change in ASB complaints against FIP families
- Percentage of children and young people of families entering the care system during the FIP intervention
- Percentage of FIP children and young people who have offended

### Domestic Violence

- Percentage of referrals to a Multi-Agency Risk Assessment Conference (MARAC) who are repeat clients
- Percentage of domestic violence crimes solved
- Percentage of finalised prosecutions with resulting in a conviction
- % of MARAC domestic violence victims reporting feeling safer at the point of leaving the IDVA service

### Sexual Violence and Abuse

- Number of police recorded serious sexual offences
- Percentage of sexual assault victims who are eligible for a SARC referral who go on to receive a service at the SARC
- Percentage of SARC referrals to independent support services who receive support
- Number of serious sexual offences detected/solved
- Percentage of finalised court cases resulting in a conviction
- Percentage of referrals to i) the SARC or ii) other specialist agencies who are repeat clients

### Racist and Religiously motivated Incidents and Crimes

- Number of racist and religiously motivated incidents recorded including those reported by at risk groups
- Number of police recorded incidents and crimes
- Percentage of police recorded crimes detected/solved

## **Community Safety, Crime Reduction and Drugs Strategy 2011-14**

- Percentage of finalised prosecutions resulting in a conviction
- Number of repeat victims
- No. or % of victims who feel that their safety has increased, harm has reduced and who feel supported
- No of (effective) interventions with the offenders of racist incidents

### **Preventing Violent Extremism**

- Number of referrals
- Number of interventions
- Number of training sessions to increase understanding of extremism amongst frontline staff
- Effectiveness of projects and partnerships supporting vulnerable institutions

### **LGBT Hate Incidents and Crimes**

- Levels of confidence and satisfaction reported in bespoke online survey – devise measurement and collect baseline data
- Number of active and effective LGBT partnerships with a community safety element.
- Number of police recorded LGBT hate incidents and crimes
- Percentage of crimes detected/solved
- Percentage of finalised prosecutions resulting in a conviction

### **Disability -motivated Incidents and Crimes**

- No. of disability hate incidents recorded including those reported by at risk groups
- Number of police recorded incidents and crimes
- Percentage of police recorded crimes detected/solved
- Percentage of finalised prosecutions resulting in a conviction
- Number of repeat victims
- No. or % of victims who feel that their safety has increased, harm has reduced and who feel supported
- No of (effective) interventions with the offenders of disability hate incidents

### **Older People**

- Number of crimes against older people per 1,000 population

## **Performance Indicators**

- Number of distraction burglaries against older people
- Percentage of older people who had reported an experienced or observed crime to the police
- Percentage of older people who feel safe in their local neighbourhood and in the city centre during the day and after dark
- Consultation with older people to find out if services are responsive to needs

## Appendix 5. Feedback on this Strategy

While this Strategy has been developed with participation from specialist officers, steering groups, etc., and has been the subject of a consultation exercise, we welcome feedback at any time.

This document provides a level of detail intended for people/groups with a particular interest in community safety and a summary version is also available for those with a more general interest.

The Strategy is subject to annual reviews and the action plans are working documents are amended as necessary by those working on them.

We would be interested in any comments on aspects such as:

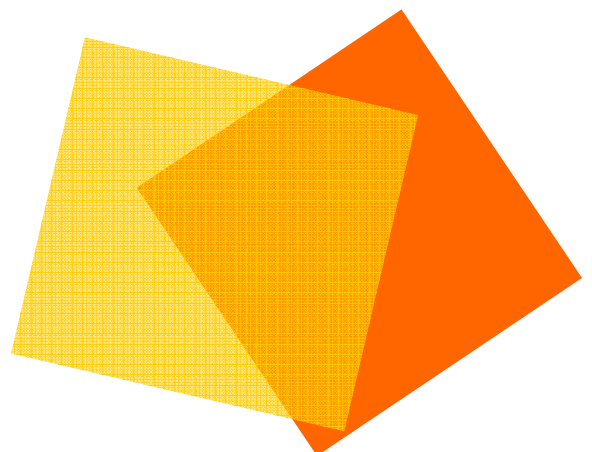
- the overall coverage
- the content of individual sections
- whether you have found the document useful, and if so, which sections you have found of most use
- the format of the document
- what improvements you would like to see
- any other comments.

If you would like to provide any feedback, you can do so by email: [community.safety@brighton-hove.gov.uk](mailto:community.safety@brighton-hove.gov.uk)

or by writing to:

The Partnership Community Safety Team  
Room 418 King's House  
Grand Avenue  
Hove BN3 2LS

**Safe in the city**  
Brighton & Hove Community Safety Partnership



## Community Safety, Crime Reduction and Drugs Strategy 2011-14

### Partnership funded projects: costs and savings

Strategy priority	Funded projects	Budget (£)	Description	Intended impact/outcomes	Costs/savings information <sup>1</sup>
Physical Environment, Infrastructure and Quality of Life	<ul style="list-style-type: none"> <li>Environmental Projects</li> </ul>	<ul style="list-style-type: none"> <li>133,820</li> </ul>	<ul style="list-style-type: none"> <li>Working in neighbourhoods and with communities to tackle problems linked with the local environment</li> </ul>	<ul style="list-style-type: none"> <li>Increased local involvement of and input from local communities; increased ownership</li> <li>Better designed and maintained local environments which resist/discourage crime and anti-social behaviour</li> <li>Increased social capital</li> <li>Improved feelings of safety, less isolation</li> </ul>	<ul style="list-style-type: none"> <li>Estimated cost of criminal damage in the city in 2010/11 was £15.1m across all partners. This is based on a Home Office average cost estimate of £998 per crime in 2011.</li> </ul>
Drugs Misuse	<ul style="list-style-type: none"> <li>Community and families drugs and alcohol outreach</li> <li>Operation Reduction (drugs enforcement and outreach)</li> <li>Drugs Intervention Project (for offenders)</li> </ul>	<ul style="list-style-type: none"> <li>195,710</li> <li>126,000</li> <li>271,000</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Support to families and communities in addressing substance misuse</li> <li>Fewer people starting to misuse drugs</li> <li>Getting people into treatment</li> <li>Achieving recovery of drug misusers</li> </ul>	<ul style="list-style-type: none"> <li>Average economic and social cost of offending during the year prior entry to drug treatment is £30K. For the 360 offenders in B&amp;H diverted into treatment via Op Reduction during 2006-9 this would amount to £2.7m.</li> <li>Nationally, drug treatment saves the taxpayer £2.50 for every £1 invested</li> </ul>
Alcohol Misuse	<ul style="list-style-type: none"> <li>(see below for youth alcohol work)</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>City-wide cultural shift in attitudes to and tolerance of problematic drinking</li> <li>Reduced alcohol consumption through reduced availability, especially to young people and heavy drinkers</li> </ul>	<ul style="list-style-type: none"> <li>Estimated costs of alcohol misuse in 2010/11 in Brighton &amp; Hove (derived from national costings) amount to:               <ul style="list-style-type: none"> <li>£10.1m in health service costs</li> <li>£24.5m economic costs</li> <li>£71.8m in costs related to</li> </ul> </li> </ul>

<sup>1</sup> Mainly taken from individual full Strategic Assessments 2010

Strategy priority	Funded projects	Budget (£)	Description	Intended impact/outcomes	Costs/savings information <sup>1</sup>
				<ul style="list-style-type: none"> <li>Reduction in harm from alcohol use in the night time economy</li> <li>Early identification, treatment and aftercare for alcohol misusers</li> </ul>	<p>crime Total: £106.4m</p> <ul style="list-style-type: none"> <li>For every £1 spent on alcohol treatment, £5 is saved elsewhere</li> <li>The unit cost of a serious wounding (2011) is £24.7K while that for other woundings is £9.2K. If we translate these unit costs to Brighton &amp; Hove crime figures, while adjusting recorded crime numbers for under-reporting, we find that in 2010/11 the cost of serious woundings in the city is £6.4 million and that for other woundings is £25.1 million.</li> </ul>
Anti-Social Behaviour/Hate Incidents and Crimes	<ul style="list-style-type: none"> <li>Street drinking/begging enforcement and outreach</li> <li>ASB and Hate Incident Casework and strategic support</li> </ul>	<ul style="list-style-type: none"> <li>501,000</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Harm caused to individuals and communities by anti-social behaviour and hate crimes is prevented and reduced</li> </ul>	<ul style="list-style-type: none"> <li>National Audit Office research found 65% of people subject to ASB interventions ceased their ASB after one intervention; 86% after two interventions and 93% after 3 interventions.</li> <li>Costs to individuals may include negative impacts on health (mental health or worsening of physical ailments – with accompanying costs to services) or financial costs (eg. lost earnings; repairs/replacement for vandalised property)</li> </ul>
Preventing Extremism	<ul style="list-style-type: none"> <li>Prevent</li> </ul>	<ul style="list-style-type: none"> <li>92,000</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Risk of harm to individuals and communities is reduced</li> <li>Individual vulnerable to being</li> </ul>	<ul style="list-style-type: none"> <li>There is no formal analysis of the cost benefit of investing in this work. However the value of preventing extremism and</li> </ul>



Strategy priority	Funded projects	Budget (£)	Description	Intended impact/outcomes	Costs/savings information <sup>1</sup>
				drawn into extremist activities are supported and institutions are supported	terrorism is considerable, both locally and nationally
Reducing Re-offending	<ul style="list-style-type: none"> <li>• (Youth crime prevention and DYO worker funded projects included in CYP section)</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Nature and volume of crimes committed by high level offenders is reduced</li> <li>• Less reoffending by those sentenced to less than 12 months in prison</li> <li>• Prevention of those at risk of being prolific offenders in future from becoming so</li> </ul>	<ul style="list-style-type: none"> <li>• National research in 2003 estimated that every prisoner who reoffends costs the criminal justice system an average of £65,000 up to the point of imprisonment, and as much as £37,500 for each year in prison, significantly more than the cost of a community sentence. By contrast, <ul style="list-style-type: none"> <li>○ A 1 year Community Rehabilitation Order costs £3,000</li> <li>○ 1 year Community Punishment Order cost £2,000</li> <li>○ 1 year Community Punishment and Rehabilitation order costs £4,000</li> <li>○ 1 year Drug Treatment Order costs £8,000</li> <li>○ A Community Payback sentence costs around £2,800 to administer.</li> </ul> </li> </ul>
Children, Young People and Families	<ul style="list-style-type: none"> <li>• Integrated Team for Families/Family Intervention Project</li> </ul>	<ul style="list-style-type: none"> <li>• Contribution of £112,000 from the community safety budget plus meeting</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Improved quality of life in neighbourhoods</li> <li>• Risk factors associated with young people's offending are reduced</li> <li>• Families stay together where it is</li> </ul>	<ul style="list-style-type: none"> <li>• Using the DfE Family Savings Calculator, the average cost avoidance figure calculated for a sample of 40 intensive family support families was £81,600 per family, of which £40,300</li> </ul>

Strategy priority	Funded projects	Budget (£)	Description	Intended impact/outcomes	Costs/savings information <sup>1</sup>
	<ul style="list-style-type: none"> <li>Youth Offending, youth crime prevention/support and alcohol misuse</li> </ul>	<p>accommodation costs of team. Total cost of project is 569,300</p> <p>Contributions of £32,620 to Youth Offending Service, £40,250 to RUOK substance misuse service and 91,000 to youth crime prevention</p>		<p>safe to do so</p> <ul style="list-style-type: none"> <li>Improved health</li> <li>Teenage years are safe and rewarding and young people are supported to achieve their full potential</li> </ul>	<p>was a saving to the local authority (national data). Case studies from 2 local families using the Family Savings Calculator have provided a estimates of 'total family savings' of £88,800 and £154,000 per family.</p> <ul style="list-style-type: none"> <li>The monetary value of saving a single high-risk young person from a lifetime of delinquency and criminal activity is estimated at between £0.91 million and £1.2 million</li> </ul>
Domestic Violence	<ul style="list-style-type: none"> <li>Services for victims (RISE, inc. IDVAs and MARAC)</li> <li>Violence Against Women and Girls Policy &amp; Commissioning</li> <li>Perpetrator Programme</li> </ul>	<ul style="list-style-type: none"> <li>476,880</li> <li>45,120</li> <li>113,290</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Increased awareness, knowledge and skills around domestic violence and decrease tolerance</li> <li>Adults and children are aware of available services and feel safe to disclose domestic violence them</li> <li>Increased safety of victims and reduced risk posed by perpetrators</li> </ul>	<ul style="list-style-type: none"> <li>The costs in Brighton &amp; Hove of responding to the consequences of domestic violence by (largely public) services and of lost economic output may be as high as £30m per year. The estimated cost of individual pain and suffering in the city is estimated at £46m pa.</li> </ul>
Sexual Violence and Abuse	<ul style="list-style-type: none"> <li>Services for victims (SARC, counselling and ISVA)</li> </ul>	<ul style="list-style-type: none"> <li>96,150</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Increased awareness of sexual violence and abuse and confidence to report it.</li> <li>Improved personal safety and a</li> </ul>	<ul style="list-style-type: none"> <li>There is a very high cost associated with sexual offences, estimated at an average £36.2K unit cost (HO estimate, 2011).</li> </ul>

Strategy priority	Funded projects	Budget (£)	Description	Intended impact/outcomes	Costs/savings information <sup>1</sup>
				better understanding of the importance of healthy relationships <ul style="list-style-type: none"> <li>• Better integration of services to support victims and improve their wellbeing</li> <li>• Increased safety of victims and reduced risk posed by perpetrators</li> </ul>	
Older People	•	•		<ul style="list-style-type: none"> <li>• Older people know about services and how to access them</li> <li>• Older people are at less risk of victimisation</li> <li>• Older people feel safer</li> </ul>	•
Partnership Management, Co-ordination and Support	<ul style="list-style-type: none"> <li>• Strategic Commissioning, Research, Performance monitoring, finance and other support (inc. statutory requirements of Crime and Disorder Act).</li> </ul>	• 206,830			



<b>Council</b>	<b>Agenda Item 83</b>
31 <sup>st</sup> January 2013	Brighton & Hove City Council

<b>Subject:</b>	<b>Review of the Secondary Admission Process for 2014/15 – Extract from the proceedings of the Children &amp; Young People Committee meeting held on the 14<sup>th</sup> January 2013</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 14 January 2013 – Children & Young People Committee		
<b>Report of:</b>	<b>Interim Lead Chief Executive Services</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Penny Jennings</b>	<b>Tel: 29-1065</b>
	<b>E-mail:</b>	penny.jennings@brighton-hove.gov.uk	
<b>Wards Affected:</b>	All		

***Action Required of Council:***

To receive the item referred from the Children & Young People Committee for approval:

**Recommendation:**

- (1) That the summary details of the Review into the Secondary School Admissions process for Brighton & Hove and its particular focus on the delineation of catchment areas be noted;
- (2) That it be agreed that no changes be made to the existing Secondary Catchment areas for the academic year 2014/15;
- (3) That the cross party working group should continue to meet on a six weekly basis to monitor the impact of national and local changes related to Secondary Admissions. This will include the creation of new academies or free schools;
- (4) That the cross party working group should reform its stakeholder group as and when needed to consider proposals for any change beyond 2014/15;
- (5) That it be noted that the Admissions Team would review its annual publications in the light of concerns over the “equal preference” system and the continued misunderstanding regarding parental “choice.”

**BRIGHTON & HOVE CITY COUNCIL**

**4.00pm, 14<sup>th</sup> January 2013  
COUNCIL CHAMBER, HOVE TOWN HALL**

**DRAFT MINUTES**

**Present:** Councillors Shanks (Chair), Buckley (Deputy Chair), Brown, Gilbey, A Kitcat, Lepper, Pissaridou, Powell, Simson and Wealls

**Non Voting Co-optees:**

Andrew Jeffery, Parent Forum, Rachel Travers, Amaze/Voluntary Sector Forum, Alan Bedford Local Safeguarding Children Forum; Geraldine Hoban, Clinical and Commissioning Group and Sue Bricknell, Sussex Community NHS Trust

**PART ONE****51. REVIEW OF THE SECONDARY ADMISSIONS PROCESS FOR 2014/15**

- 51.1 The Committee considered a report of the Interim Director of Children's Services in relation to the work of the cross party working group which had been set up in 2011 to look at the availability of school places. In June 2012 the remit of that group had been expanded to review the secondary schools admissions policy and relevant catchment areas.
- 51.2 The report detailed the results of this review and the Strategic Commissioner, Planning and Contracts confirmed that stated that no changes were recommended to the present catchment areas for the academic year 2014/2015.
- 51.3 Councillor Gilbey stated that as a member of the Cross Party Working Group she had been notified of dates of future meetings, these had been scheduled on a six weekly basis rather than termly, in her view this was preferable. The Strategic Commissioner, Planning and Contracts confirmed that it had been agreed that meetings would be held six weekly in future.

**51.4 RESOLVED TO RECOMMEND**

- (1) That the Committee notes the summary details of the Review into the Secondary School Admissions process for Brighton & Hove and its particular focus on the delineation of catchment areas;
- (2) That the Committee agrees that no changes will be made to the existing Secondary Catchment areas for the academic year 2014/15;
- (3) That the Committee agrees that the cross party working group will continue to meet on a six weekly basis to monitor the impact of national and local changes related to Secondary Admissions. This will include the creation of new academies or free schools;

- (4) That the Committee agrees that the cross party working group will reform its stakeholder group as and when needed to consider proposals for any change beyond 2014/15;
- (5) That the Committee notes that the Admissions Team will review its annual publications in the light of concerns over the “equal preference” system and the continuing misunderstanding regarding parental “choice”.





<b>Council</b>	<b>Agenda Item 83</b>
31 January 2013	Brighton & Hove City Council

<b>Subject:</b>	<b>Review of the Secondary Admission Process for 2014/15</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 14 January 2013 – Children & Young People Committee		
<b>Report of:</b>	<b><i>Director of Children's Services</i></b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Gil Sweetenham</b>	<b>Tel: 29-3474</b>
	<b>E-mail:</b>	<a href="mailto:Gil.sweetenham@brighton-hove.gov.uk">Gil.sweetenham@brighton-hove.gov.uk</a>	
<b>Wards Affected:</b>	All		

## FOR GENERAL RELEASE

### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 The present Secondary School Admissions system was agreed at the full Council Meeting held on 27 February 2007.
- 1.2 At that meeting the following recommendations were agreed:
  - (4) *That it be agreed that the new schools admission system be kept under review so that if necessary the catchment area boundaries could be adjusted after the first year of operation, in light of the pattern of preference and allocations in that year; and*
  - (5) *That as recommended by the Working Group, a review of the whole secondary schools admissions system in 2012 be approved.*
- 1.3 In 2011, a cross party working group was set up to look at the availability of school places. This has proved a useful vehicle for seeking consensus in an area which can be very difficult for parents/carers and their children. In June 2012 the remit of the group was expanded to review the secondary schools admissions policy and relevant catchment areas.
- 1.4 This report details the results of this review, and recommends that no changes to the present Catchment areas be proposed for adoption for the academic year 2014/2015.

### 2. RECOMMENDATIONS:

- (1) That the Committee notes the summary details of the Review into the Secondary School Admissions process for Brighton & Hove and its particular focus on the delineation of Catchment areas .
- (2) That the Committee agrees that no changes will be made to the existing Secondary Catchment areas for the academic year 2014/15.

- (3) That the Committee agrees that the cross party working group will continue to meet on a termly basis to monitor the impact of national and local changes related to Secondary Admissions. This will include the creation of new academies or free schools.
- (4) That the Committee agrees that the cross party working group will reform its stakeholder group as and when needed to consider proposals for any change beyond 2014/15.
- (5) That Committee notes that the Admissions Team will review its annual publications in the light of concerns over the 'equal preference' system and the continuing misunderstanding regarding parental 'choice'.

### **3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 Each year local authorities are required by statute to consult upon school admission arrangements and school admission numbers with community schools and voluntary aided schools, neighbouring Local Authorities and with parents living in the City. This process includes the proposed admission priorities for community schools and those proposed by the governing bodies of voluntary aided schools and academies. The Council has carried out the required consultations on school admissions each year, however this Review was intended to be an additional wholesale review of the secondary admissions policy following the adoption of the new policy in 2007.
- 3.2 The annual consultation exercise carried out in 2012 identified concerns regarding the Patcham, Portslade and BACA catchment areas and this led to the changes for 2013 regarding Portslade and Dorothy Stringer/Varndean catchment areas being proposed and agreed.
- 3.3 Additionally an independent review of the Secondary Admissions process was commissioned by the Council through Cognisant Research in January 2012. A number of issues were raised at focus groups meetings in local primary schools and at public meetings. The findings of Cognisant Research require contributed to this review of the Secondary Admissions process.
- 3.4 Secondary school number projections identify the need for up to another 500 places by 2018/19. These may be provided through increasing existing schools or by providing entirely new schools. If a new school is to be provided this has to be as a free-school or academy. It was necessary in the review to consider where these schools are likely to be established and their potential impact on existing catchment areas.
- 3.5 The terms of the Review of the Secondary Admissions process were as follows:
  - Establish monthly meetings of the cross party working group to consider progress with the Review
  - Analyse the number projections for each catchment area between 2013/18
  - Identify possible new secondary school provision in the City
  - Model possible changes to catchment areas including potential new schools and identify those that ensure that catchment areas 'catch'

- Agree with the cross party working group consultation processes to ensure that the community, members and schools are fully informed regarding any proposed changes
  - Ensure that the implications of potential changes are fully detailed in the School Organisation Plan which is published annually
- 3.6 The cross party working group began meeting on 8<sup>th</sup> December 2011 and has continued to meet on a monthly basis. Following the Children and Young Peoples Committee of June 2012 it was agreed that the focus of this group would move from school place planning to that of the Secondary Admissions process and relevant catchment areas. Membership of the group was expanded to include two councillors from each of our local political parties.
- 3.7 The Cross Party group agreed that the present process for Secondary Admissions involving designated catchment areas and the use of random allocation as a 'tie-breaker' should continue. This system, although controversial at its inception, is now well understood by parents and has led to a significant reduction in directed school places in the last four years.
- 3.8 The national change to an equal preference system replacing the 'first preference first' system is still not universally recognised and is further confused by the publication of first preference data and frequent references to parental 'choice'. As these are dictated by the national agenda they cannot be changed by the Council. However members of the working group felt that we should review the admissions booklet, website and any other published material to better explain the change to the preference model and amplify the fact that parents can express preferences rather than have a 'choice' of secondary school for their children. This will be done as part of the annual review of published admissions details.
- 3.9 The Cross Party Group also felt that further focussed work should be carried regarding the delineation of catchment areas.
- 3.10 To do this the cross party working group agreed the introduction of a stakeholder group which included a representative from each of the secondary schools in the City. The group included a Headteacher, assistant heads, bursars, and Chairs of Governors. The group was supported by a team of four officers. The Stakeholder group met on three occasions beginning on 23<sup>rd</sup> October 2012 with members of the cross party group attending the final two meetings.
- 3.11 Officers visited each of the secondary schools in September/October and met with Headteachers and their Governor Representative to garner their views regarding any potential catchment area changes for 2014/15.
- 3.12 Both the cross party and stakeholder groups were presented with number projections for each catchment area between 2013/18. Both groups received Officers reports on their visits to individual schools.
- 3.13 It was concluded that there were four possible catchment area changes being requested by individual schools. Patcham, PACA, BACA and Longhill were all keen to have their catchment areas expanded.

- 3.14 Following discussion with members and school representatives, Officers modelled a range of changes and their associated permutations. These were presented to the groups alongside amended figures identifying potential student numbers in each postcode area and relevant trend data.
- 3.15 Both groups also considered the introduction of King's Church of England School, a Secondary Christian Freeschool, and its likely impact on projected pupil numbers and existing catchment areas. This was seen as the biggest unknown and in the absence of trend data for King's Church of England School intake was seen as a key concern in the immediate future.
- 3.16 Having looked in detail at this array of information and having set these against the potential impact of a range of catchment area changes and the introduction of Kings School, both groups recommended no change for 2014/15.

#### **4. CONSULTATION**

- 4.1 The Review of Secondary School Admissions for 2014/15 included consultation with the cross party working group, with headteachers and their governor representative, and with a stakeholder group comprising of a representative from each secondary school in the City and King' Church of England School.

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

- 5.1 It is not possible to quantify in detail the financial implications of these recommendations. However, any changes to admission arrangements or patterns may impact on the numbers of pupils at individual schools and therefore individual school budget allocations which are largely driven by pupil numbers.

Finance Officer Consulted: David Ellis

Date: 20 December 2012

##### Legal Implications:

- 5.2 Any admissions policy adopted by the Council must comply with the requirements contained in the School Standards and Framework Act 1998, and in the School Admissions Code 2012. In carrying out the Review the working group has also been mindful of the need to ensure that it fulfils its statutory duty under section 14 of the Education Act 1996 to secure that there are sufficient school places in the City.

*Lawyer Consulted: Serena Kynaston*

*Date: 3 January 2013*

##### Equalities Implications:

- 5.3 Planning and consultation for school admissions procedures and school places and the operation of the admission process are conducted in such a way as to avoid potentially discriminatory admissions priorities or planning processes. The city council and voluntary aided school and academy governing bodies must be mindful of bad practice with regard to equalities issues as described in the School Admissions Code of Practice.

#### Sustainability Implications:

- 5.4 School admission arrangements are intended so far as it is possible to provide pupils with local places where they have asked for them. The planning of school places for the City takes into account the changing population pattern and resultant demand for places. The current pattern of parental preference is reflected in different schools operating both over and under capacity. In planning for school places the Council will have regard to sustainability priorities and seek to provide local places and places which are accessible by safe walking and where possible cycling routes and public transport wherever this is possible.

#### Crime & Disorder Implications:

- 5.5 Balanced school communities with firm parental support contribute to orderly and harmonious communities.

#### Risk and Opportunity Management Implications:

- 5.6 Any change to school attendance patterns and pupil numbers will impact directly on resource allocation both revenue and capital, and on the Council's ability to meet parental expectations on school places. Pupil data and broader population data is used to identify the numbers of school places required and where they should be located. This feeds into the capital programme so that resources are allocated where they will have the most beneficial effect.

#### Corporate / Citywide Implications:

- 5.7 The allocation of school places affects all families in all parts of the City and can influence where people choose to live. Failure to obtain the desired choice of school can create a strong sense of grievance. The process of expressing a preference and if disappointed, entering an appeal can create intense anxiety for many families in the City. Admission arrangements together with school place planning are framed in such a way as to be mindful of supporting the needs of communities.

### **6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 The cross party working group and the stakeholder group considered the introduction of King's Church of England School, a Secondary Christian Freeschool, and its likely impact on projected pupil numbers and existing catchment areas. This was seen as the biggest unknown and in the absence of trend data for King's Church of England School intake was seen as a key concern in the immediate future.
- 6.2 Having looked in detail at this array of information and having set these against the potential impact of a range of catchment area changes and the introduction of King's Church of England School, both groups recommended no change for 2014/15.

### **7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 The present Secondary School Admissions system was agreed at the Full Council Meeting held on 27 February 2007. At that meeting it was agreed that as recommended by the Working Group, a review of the whole secondary schools admissions system in 2012 be approved.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. NONE

### **Documents In Members' Rooms**

1. NONE

### **Background Documents**

1. NONE

**Council**

31 January 2013

**Agenda Item 85**

Brighton &amp; Hove City Council

<b>Subject:</b>	<b>Annual Health &amp; Safety Service Plan 2013-14</b>		
<b>Date of Meeting:</b>	<b>31 January 2013</b> 24 January 2013 – Policy & Resources Committee		
<b>Report of:</b>	<b>Strategic Director Place</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Roy Pickard</b>	<b>Tel: 292145</b>
	<b>Email:</b>	<b>roy.pickard@brighton-hove.gov.uk</b>	
<b>Ward(s) affected:</b>	<b>All</b>		

**FOR GENERAL RELEASE****1. SUMMARY AND POLICY CONTEXT:**

- 1.1 The Health & Safety Annual Service Plan required under the Health & Safety at Work Act etc 1974 Section 18 standard is part of the Council's Policy Framework on which the relevant cabinet member and other stakeholders are normally consulted before final proposals are formulated.
- 1.2 This work is very important to a city like Brighton & Hove with its leisure and tourist industry, its night time economy and its retail businesses. It keeps the city's workers, residents and visitors safe and healthy and enhances the city's reputation as an attractive place to work, live and visit.

**2. RECOMMENDATIONS:**

- 2.1 That the Committee agrees the proposed Health & Safety Annual Service Plan 2013/2014 at Appendix 1 and recommends that Council approve it.

**3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 The Health & Safety Annual Service Plan is a statutory document required under guidance issued by the Health and Safety Executive (HSE), Section 18 Standard. The Annual Service Plan for this year reviews 2012-13 and details the aims and objectives for the enforcement of health & safety as a function of the Health & Safety Team.
- 3.2 Section 18 of the Health and Safety at Work etc Act 1974 (HSWA) puts a duty on Local Authorities (LAs) to make adequate arrangements for enforcement. The primary purpose of the HSWA is to control risks from work activities. The role of the Local Authority is to provide advice and support to duty holders, manage and control these risks and thus prevent harm to employees and to the public.
- 3.3 In March 2011, the Minister for Employment announced the next steps in the Government's plans for reform of the health and safety system in Britain with the publication of "Good Health and Safety, Good for Everyone" by Lord Young. Under the reforms, protecting people in the workplace and in society as a whole

remained a key priority. The focus of the health and safety regime will move to a lighter touch approach concentrating on higher risk industries and on tackling serious breaches of the rules.

- 3.4 The Government's reforms require the HSE and LAs to reduce the number of inspections carried out; to have greater targeting where proactive inspections continue; and to increase information provision to small businesses in a form that is both accessible and relevant to their needs. This policy framework was also set out in the Hampton Report and the Lofsted report.
- 3.5 In May 2011, Local Government Group (LGG) and HSE published joint guidance - "Reducing Proactive Inspections". This guidance required local authorities to only routinely inspect high risk businesses.
- 3.6 In Brighton & Hove this change meant that proactive inspections of businesses were reduced from over 400 to less than 20 per year. However, following the reports: Smart Regulation and Economic Growth – Seizing the Tourism Opportunity – DCMS, the Lofstedt review – Reclaiming health and safety for all, LAC 67-2 rev3 - national H&S planning priorities, Good Health & Safety, Good for Everyone – DWP, and Lord Young's Common Sense Common Safety. The HSE is now consulting on a National Local Authority Enforcement code. It is likely to require Councils are to investigate accidents and complaints but also inspect proactively a substantial list of activities and sectors:
  - Premises with cooling towers/evaporative condensers,
  - Tyre fitters and motor vehicle recovery as part of car sales,
  - High volume warehousing and distribution,
  - Industrial retail/wholesale premises,
  - Steel stockholders,
  - Builders/timber merchants ,
  - Animal visitor attractions,
  - High volume warehousing distribution,
  - Large scale public events, sports and leisure facilities e.g. motorised leisure pursuits including off road vehicles and track days,
  - Commercial catering premises using solid fuel cooking equipment, and
  - Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off-licences/care settings).
- 3.7 For medium risk businesses it is expected that LAs will undertake appropriate interventions but not proactive inspections" as part of a national priority programmes, local priority programmes or individually during the work year. The 2013-14 service plan has devoted some resources for the team to participate in the national legionella project focusing on cooling towers and spar pools.
- 3.9 Local authorities are expected to work with low risk businesses in a reactive way only. This will be done by investigating referrals from partner agencies such as the police or fire brigade, complaints made about businesses and investigating accident notifications.
- 3.10 There are risks with this approach. With only routine inspection of high risk businesses, the standards of safety and welfare in workplaces may deteriorate as a result of this light touch regulation.



- 3.11 To ensure local transparency and accountability, it is a requirement that the Health & Safety Service Plan is submitted to the relevant member forum for approval. It also requires members to make a commitment to the Health & Safety Executive strategy 'be part of the solution'

#### **4. COMMUNITY ENGAGEMENT AND CONSULTATION**

- 4.1 The service plan will be part of a rigorous consultation process in March 2013 involving members of the public, employers, employees, internal and external stakeholders such as Trade Unions, Corporate Health & Safety and local business forum. It must be a published document and is also available on the Council's website.
- 4.2 Businesses satisfaction rates for the Health and Safety service remain high with 99.4% of business feeling that they had been treated fairly and 98.8% of businesses felt the contact was helpful.

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

- 5.1 The annual Health and Safety Service Plan sets out the approach that the Council will use to fulfil its statutory duties. The 2013/14 net budget for the Health and Safety Service within Environmental Health will be determined by Budget Council on 28<sup>th</sup> February 2013. The net budget for 2012-13 is £236,000, and this includes a figure to cover the appropriate proportion of the Head of Environmental Health & Licensing and administrative support.

*Finance Officer Consulted: Name Karen Brookshaw Date: 17/01/13*

##### Legal Implications:

- 5.2 Local authorities have a duty under Section 18 of the Health and Safety at Work Act 1974 to make adequate arrangements for enforcement of health and safety legislation in their area. 'The Standard for Health and Safety Enforcing Authorities' issued by the Health & Safety sets out the requirements that local authorities are obliged to follow in meeting their s18 duty'. The plan in Appendix 1 complies with these requirements. Council health and safety inspectors apply proportionate decision making in accordance with the Council's Enforcement Policy, HSE's Enforcement Policy Statement and Enforcement Management Model
- 5.3 The Council's Constitution requires the adoption of the Health & Safety Annual Service Plan to be reserved to full Council.

*Lawyer Consulted: Elizabeth Culbert*

*Date: 15/1/13*

##### Equalities Implications:

- 5.4 An Equalities Impact Assessment has been completed as part of our contact with groups during discussions in 2010 a review of this impact assessment was carried out in 2012.

- 5.5 Where business considers that they operate in a lower risk sector and have been unreasonably subject to a proactive health and safety inspection by an LA they can complain to the Independent Regulatory Challenge Panel whose members have the competence and experience to assess regulatory matters.

Sustainability Implications:

- 5.5 Unacceptable risk, fatalities and major injuries would reduce development of the city, tourism and benefits to local people, in addition to private and family lives.

Crime & Disorder Implications:

- 5.6 Reduction in crime and disorder as part of the work place violence projects and retail robbery work.

Risk and Opportunity Management Implications:

- 5.7 The National Code sets out Government expectations on a risk based approach to targeting health and safety regulatory interventions. It provides a principle based framework that recognises the respective roles of business and the regulator in the management of risk. It sets out the risk based approach to be followed by LA regulators that will provide business with a consistency of approach. At the same time, following the principles of the Code will ensure LAs make the best use of their regulatory resource by focussing their efforts where it really matters.

Public Health Implications:

- 5.8 The service plan protects public health by improving standards in work places reducing sickness and ill health. The public and visitors to the city are also protected from accidents and incidents that can lead to injury.

Corporate / Citywide Implications:

- 5.9 A safe and healthy workforce benefits the local economy and develops the city's tourism.
- 5.10 The Council achieves enforcement consistency by:
- Having a publically available risk-based service plan and information on health and safety interventions, enforcement, and prosecution activity;
  - Having easily accessible complaints procedures that clearly references the Independent Regulatory Challenge Panel; and
  - Benchmarking performance against other Sussex authorities and via data returns to HSE.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 None. The Service Plan is a statutory requirement. The National Code provides direction to local authorities on meeting statutory requirements

## **7. REASONS FOR REPORT RECOMMENDATIONS**

7.1 Compliance with statutory duties.

7.2 Whilst the primary responsibility for managing health and safety risks lies with the business who creates the risk, health & safety regulators have an important role in ensuring the effective and proportionate management of risks, supporting business, protecting their communities and contributing to a wider public health agenda

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Health & Safety Annual Service Plan 2013/2014

### **Documents in Members' Rooms**

1. None

### **Background Documents**

1. Health & Safety at Work etc Act 1974
2. Reducing administrative burdens: Effective inspection and enforcement – Philip Hampton - March 2005
3. Health & Safety Executive strategy 'be part of the solution'
4. Local Authority Circular 67(3)
5. Common sense, Common Safety - Professor Ragnar E Lofstedt  
October 2010
6. Lord Young Report - Department of work and pensions. Good Health & Safety,  
Good for Everyone March 2011
7. Local Government Group2 (LGG) and HSE published joint guidance -  
"Reducing Proactive Inspections
8. Reclaiming Health & Safety for all. An Independent review of health & safety  
legislation. Professor Ragnar E Lofstedt. November 2011

# Appendix 1

## Brighton & Hove City Council – Service Plan - Health and Safety at Work – 2013/14

Overall **Aim** of the Service:

Tackling inequality by engaging with people who live and work in the City to protect public health by ensuring that the risks in changing workplaces are properly managed.

### Summary of national planning priorities 2013 - 2014

#### Over arching principles

Local Authorities should decide, plan and target their health & safety interventions having regard to the range of interventions available, the risk profile of the business/sector, national information (accident statistics, national priorities, Primary/Lead Authority inspection plans) and local knowledge and priorities. Local Authorities should reserve proactive inspection for Category 'A' premises and consider the use of other non-inspection techniques for other categories of premises. In keeping with the Government's reforms of health and safety, there are no restrictions on reactive work.

Our key delivery **priorities** are:

- To inspect category A premises
- To investigate accidents
- To respond to complaints and enquires
- To respond to referrals from services or other organisations
- To participate in the national legionella project.
- To support the city's outdoors events
- Improving worker safety in late night take-aways
- Registering and ensuring tattooists comply with the city's bylaws

#### List of activities/sectors for proactive inspections by local authorities – specified in the draft national enforcement code.

No	Hazards	High Risk Sectors	High Risk Activities
1	Legionella infection	Premises with cooling towers/evaporative condensers	Lack of suitable legionella control measures
2	Explosion caused by leaking LPG	Premises (including caravan parks) with buried metal LPG pipework	Buried metal LPG pipe work For caravan parks to communal/amenity blocks only)

3	e.coli/cryptosporidium infection esp. in children	Open Farms/Animal Visitor Attractions	Lack of suitable microorganism control measures
4	Fatalities/injuries resulting from being struck by vehicles	Tyre fitters*/ MVR* (as part of Car Sales) High volume Warehousing/Distribution	Use of two-post vehicle lifts Workplace transport
5	Fatalities/injuries resulting from falls from height/ amputation and crushing injuries.	Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants	Workplace transport/work at height/cutting machinery /lifting equipment.
6	Industrial diseases (occupational asthma/deafness)	MVR* Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants	Use of Isocyanate paints Noise and dust.
7	Falls from height	High volume Warehousing/Distribution	work at height
8	Crowd control & injuries/fatalities to the public	Large scale public events/sports/leisure facilities e.g. motorised leisure pursuits including off road vehicles and track days	Inadequate consideration of public safety e.g. poor organisation and/or supervision of high speed or off-road vehicle movements
9	Carbon monoxide poisoning and gas explosion	Commercial catering premises using solid fuel cooking equipment	Lack of suitable ventilation and/or unsafe appliances.
10	Violence at work	Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off-licences/care settings.	Lack of suitable security measures/procedures

#### Local Priorities:

- Skin Piercing.

- Improving safety of workers employed by late night takeaways
- Supporting the city's outdoors events
- Supporting late night take-aways to reduce incidents of work place violence

### **Our Achievements:- 'Selling our story' –Review of the 2012/13 Service plan**

The team's achievements in 2012/13 were:

- Inspections of city's high risk businesses.
- Inspection of the city's cooling towers.
- Completed 50 visits to night clubs and bars to give advice and assistance on reducing workers exposure to excessive noise.
- New hotel health and safety resource designed for the Council's website.
- Carried out 150 visits to skin piercers to ensure they are compliant with the city's bylaws.
- Advice given to 5 registered scrap metal merchants to ensure they comply with changes in the Scrap Metal Dealers Act.
- Carried out visits to 50 swimming pool and spa pools to give advice regarding chemical use and legionella.
- Reviewed all the city's pyrotechnic events.
- Responded to 675 service requests.
- Reviewed 250 accident notifications and investigated as necessary.
- Scrutinised 250 new and varied licence applications & planning applications.
- Ensured that the City's outdoor events ran safely and included advice and assistance given to Pride, Marathon, Burning of the Clocks, Chinese State Circus and the Brighton Festival, Brighton carnival and the children's parade, Fat Boy Slim concert at the Amex stadium, Shakedown,
- Feedback given to all late night take-aways that participated in the violence at work research project. Results of project presented to the racial harassment forum with action plan identified for further work.
- Participating in the Sussex flexible warranting scheme and Major Incident Team.
- 12 messages of the month sent to over 200 businesses on mailing list
- Gave advice to 120 nursery's in the city in respect of visits to animal attractions.
- Inspected 50 swimming pools
- Carried out 2 successful prosecutions.
- Carried two fatality investigations
- Served 26 improvement notices

- Served 3 prohibition notices
- Healthy Workplaces sub-group established and forms part of the wider Healthy City Partnership, targeting doctors in areas of deprivation
- Promoted the 'Workplace Wellbeing Charter'
- Continue to promote the Free Health Check service for employers and employees.
- Businesses have received Health Checks for their workforce
- Health Checks were conducted in workplaces
- 6 x Beach Volleyball Tournaments for businesses held over the summer
- Small grants scheme (up to £500) 9 businesses received grants to deliver a programme that addressed the health and wellbeing of employees

## **Ensuring Quality**

To ensure that the service we offer to residents and businesses is of high quality we will ensure that:

- All officers carrying out enforcement work are appropriately authorized, according to their ability, qualifications, expertise and experience.
- That officer's competence is continually assessed and that we support officers to develop their skills and widen their experience.
- That we will ask for feedback from business and residents on the quality of the service we provide and strive to continually improve
- That our work is audited externally by the British Standards Institute to ensure compliance with ISO9001 Quality Assurance.
- We will continue to participate in local peer reviews with neighbouring local authorities to ensure consistency and best practice.
- To continually update our data base to provide accurate details of business to help us communicate targeted health & safety messages effectively.



## Work plan and resources

Staff resources – 3.9 FTE Health & Safety Team – 2.25 FTE Occupational Health Team

Item	Resources	Timescales	How & Why	Outcome
<b>Inspection of Category A premises</b>				
To carry out approximately 20 High risk planned general inspection targeting the highest risk (category A,) including Cooling Towers	0.1 FTE	Throughout 2013/14	To carry out 20 planned general inspections to high risk business due to be inspected in 2011/12. To advise and carry out enforcement as necessary	<b>National Planning Priority</b> Proactive Inspection of Category A premises <b>Type of Intervention</b> Inspection <b>Performance Indicator</b> Number of inspections undertaken. % increase in confidence in management % increase in H&S compliant businesses <b>Outcome</b> To maintain or where necessary improve standards of employee and public health and safety in local businesses.
<b>Investigations of complaints</b>				
To respond to approximately 650 requests for service	1.7FTE	Throughout 2013/14	Respond to 95% of Service Requests within	<b>National Planning Priority</b> Reactive referral work

			deadlines.	<b>Performance Indicators.</b> Percentage of Service Requests responded to within departmental deadlines. <b>Outcome</b> Maintain standards of customer service at a high level.
<b>Skin Piercing Registration</b>				
To carry out visits to register skin piercers and premises and to ensure compliance with the city's bylaws.  To crack down on un-registered home tattooists	0.4FTE	Throughout 2013/14	Visits to 150 premises to ensure compliance with the City's bylaws and Health & Safety Legislation Using social media to identify un registered home tattooists and to prevent them from operating or to register them and comply with the councils bylaws	<b>National Planning Priority</b> Reactive referral visits <b>Performance Indicator</b> No of visits carried out <b>Outcomes</b> Reduction of complaints about skin piercers
<b>Investigation of Accidents</b>				
To review all accident notifications and to investigate them all appropriately.	0.7 FTE	Throughout 2013/14	To review approximately 250 accident notifications and investigate accidents where they meet BHCC criteria for investigation	<b>National Planning Priority</b> Reactive referral work <b>Performance Indicator</b> Number of accidents investigated. <b>Outcome</b> Reduce the level of work place accidents in local businesses

<b>Participate in the national Legionella Project</b>				
To visit swimming/spa pools to raise awareness of chemical use and legionella risks	0.1 FTE	Throughout 2013/14	Visits to 30 premises.	<b>National Planning Priority &amp; National Enforcement Code</b> Intervention of B1 & B2 premises <b>Type of intervention</b> Awareness raising and education <b>Performance Indicator</b> Number of spas visited. <b>Outcome</b> Reduce the likelihood of legionella outbreak. Raising awareness of legionella.
<b>Supporting Small &amp; Medium Sized Enterprises</b>				
Send monthly health & safety messages promoting sensible risk management. & Updating website to provide resource for small and medium sized businesses	0.1 FTE	Throughout 2013/14	Collect email addresses from visits & self assessment risk rating questionnaires. Use BHCC email system to deliver messages. Update the website.	<b>National Planning Priority</b> Education and awareness <b>Type of intervention</b> Awareness raising and education <b>Performance Indicator</b> Number of messages sent Website updating <b>Outcome</b> Increased standards of employee and public health and safety business contacted. Sensible risk management promoted

<b>Supporting the city's outdoor events</b>				
Support the following community events <ul style="list-style-type: none"> <li>• Brighton Marathon</li> <li>• Children's Parade</li> <li>• Brighton Carnival</li> <li>• Brighton Fringe Festival</li> <li>• Brighton Festival</li> <li>• Brighton Speed Trials</li> <li>• Ladyboys of Bangkok</li> <li>• Paddle Around the Pier</li> <li>• Moscow State Circus</li> <li>• Pride</li> <li>• Zippo Circus</li> <li>• Burning of the clocks</li> <li>• Brighton Marathon</li> <li>• Shakedown</li> <li>• White Night</li> <li>• Tattoo Convention</li> <li>• Organised firework displays</li> </ul>	0.5 FTE	Throughout 2013/14	Scrutinising event management plans and providing advice for event organisers.	<b>National Planning Priority &amp; National Enforcement Code</b> Reactive referral work <b>Type of intervention</b> Promoting best practice. <b>Performance indicator</b> Number of Event Management Plans Reviewed <b>Outcome</b> Increased safety at public community events. Forming links with communities
<b>BME Takeaways – Work place violence</b>				
To complete visits to 30 BME takeaways, working with the racial harassment forum, the partnership	0.1 FTE	Throughout 2013/14	Visits to 30 vulnerable premises (takeaways) identified in the	<b>National Planning Priority &amp; National Enforcement Code</b> A significant potential local issue and where there is a sufficient

community safety team, and police to raise awareness of work related violence and ensure compliance with other related H&S requirements.			questionnaire survey of 2011. To provide 121 support given to draft risk assessments and to identify controls to combat violence at work, stress at work, Slips trips and falls, gas/electrical safety, working with the police, business crime reduction partnership, partnership community safety team, racial harassment forum	weight of intelligence over a period of time. <b>Type of intervention</b> Awareness raising and education & and working with those at risk. <b>Performance indicator</b> Number of completed visits % increase in confidence in management % increase in those premises that are H&S compliant. <b>Outcome</b> Increased standards of employee and public health and safety in take-away premises. Increased awareness of specific and general H&S issues pertinent to night time economy businesses.
<b>Partnership Working</b>				
Participate in the Sussex Liaison Group (SHSLG) pan Sussex health & safety project	0.1 FTE	Throughout the year	Represent BHCC at SHSLG	<b>National Planning Priority</b> Section 18 compliance - partnership working

		2013/14	Participate in Sussex wide Health & Safety initiative	<b>Performance indicator</b> Number of meetings attended Project completed. <b>Outcome</b> Joined up approach to regional health & safety initiatives.
<b>Alcohol Licensing and Planning Applications</b>				
To review new and varied alcohol licence applications & planning applications and make representations where appropriate.	0.1 FTE	Throughout 2013/14	Scrutinise and comment on applications where appropriate. 150 licensing applications and 100 planning applications. Advice on CDM regulations & workplace regulations. Visits to premises as necessary.	<b>National Planning Priority</b> Reactive referral work <b>Performance indicator</b> Numbers of licence & planning applications reviewed. <b>Outcome</b> Proactive development of consistent and high standards of health and safety in proposed new commercial operations and licensed premises.
<b>Healthy Work Places</b>				
Healthy Workplaces Action Plan completed as part of the wider Healthy City Partnership	0.2 FTE	Throughout 2013/14	To promote the importance of workplace health and wellbeing to businesses	<b>Responsibility Deal</b> Workplace health and wellbeing pledge for businesses <b>Type of intervention</b> Advice and support <b>Performance Indicator</b> Number of businesses promoting employee health and wellbeing <b>Outcome</b>

				Increased health and wellbeing initiatives in the workplace
Promote the Healthy Workplace Action Plan to businesses	0.1 FTE	Through ut 2013/14	To provide advice and support to employers around the benefits of addressing employee health and wellbeing	<b>Responsibility Deal</b> Workplace health and wellbeing pledge for businesses <b>Type of intervention</b> Advice and support <b>Performance Indicator</b> Number of businesses promoting employee health and wellbeing <b>Outcome</b> Improved health & wellbeing in the workplace
Promote the Workplace Wellbeing Charter (WWC) to businesses	0.1 FTE	Through ut 2013/14	To promote the WWC to businesses	<b>Workplace Wellbeing Charter</b> Self assessment standards <b>Type of intervention</b> Advice and support <b>Performance Indicator</b> Number of business engaged with the action plan <b>Outcome</b> Improved health & wellbeing in the workplace
Work with businesses to attain WWC status	0.1 FTE	Through ut 2013/14	To promote the importance of workplace health and wellbeing to businesses	<b>Workplace Wellbeing Charter</b> Self assessment standards <b>Type of intervention</b> Review work practices in light of WWC standards <b>Performance Indicator</b>

				Number of businesses signed up to the WWC <b>Outcome</b> Increased health & wellbeing initiatives
Promote the Free NHS Health Check Service for employers and employees.	0.1 FTE	Throughout 2013/14		<b>NHS Health Checks</b> Vascular risk assessment <b>Type of intervention</b> NHS Health Checks for employees <b>Performance Indicator</b> Number of health checks delivered <b>Outcome</b> Improved health & wellbeing and reduced sickness absence
Promote Small Grants scheme available to businesses	0.1 FTE	Throughout 2013/14	Promoting the small grants scheme to businesses	<b>Healthy City Partnership</b>  <b>Type of intervention</b> Support and advice around health and wellbeing initiatives <b>Performance Indicator</b> Number of grants awarded <b>Outcome</b> Improved employee health and wellbeing
Support Businesses in the delivery of health promoting activities that address employee health and wellbeing	0.1 FTE	Throughout 2013/14	Provide advice and support to businesses around workplace health and wellbeing	<b>Healthy City Partnership</b>  <b>Type of intervention</b> Support and advice



				<b>Performance Indicator</b> Number of business engaged with the action plan <b>Outcome</b> Increased health & wellbeing initiatives
Organise 5 x Beach Volleyball Tournaments through summer months	0.1 FTE	Throughout 2013	To promote the importance of physical activity in the workplace	<b>Healthy City Partnership</b>  <b>Type of intervention</b> Physical activity <b>Performance Indicator</b> Number of business taking part <b>Outcome</b> Increased physical activity



**NOTICE OF MOTION****CONSERVATIVE GROUP****COUNCIL STRUCTURE AND SERVICE DELIVERY**

“This Council notes that local authorities have a statutory obligation to their residents to secure continuous improvement in the way in which their functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

Therefore, this Council notes with concern the recent assessment of the Audit Commission that spending at Brighton & Hove is ‘generally in the top 10%’ of councils and that the Council’s unit costs ‘also appear high compared to other local authorities’.

This Council further notes that the ratio of managers to staff in the organisation is relatively high in comparison to the private sector and, given that staff account for over a third of the Council’s total expenditure, agrees that a review of staffing structures would be beneficial for council taxpayers.

This Council also notes that there are functions still being carried out, such as the collection of large volumes of performance data, that Communities & Local Government has recommended should stop, and that are continuing to absorb funds that could be usefully redeployed to front line services.

This Council is also greatly concerned that the current Administration has effectively abandoned any attempts to introduce and bed in a commissioning model of service delivery and continues to prioritise in-house services for political reasons without any evidence that they provide taxpayers with better value for money. This failure to take an open-minded and holistic approach to the delivery of services condemns the local authority to years of further salami-slicing of budgets with the result being an inevitable deterioration in the standard of essential frontline services.

Therefore, this Council:

- (i) Requests the Chief Executive to carry out a review of the structure of the organisation as part of the modernisation programme, with particular reference to layers of management and numbers of managers per member of staff, and to report back to Policy & Resources Committee;
- (ii) Requests the Policy & Resources Committee to consider the report and make decisions about who delivers Council services based on

objective evidence of costs and benefits to residents rather than on political dogma.

Proposed by: Cllr Janio

Seconded by: Cllr Cox

Supported by: Cllrs G. Theobald, Peltzer Dunn, Cobb, A Norman, K Norman, C Theobald, Brown, Simson, Mears, Hyde, Smith, Wealls, Barnett, Wells, Pidgeon and Bennett.

**NOTICE OF MOTION****GREEN GROUP****REJECT THE BENEFIT CAP**

"This council notes that the Government plans this year to implement an annual cap on the total benefits a household can receive. This cap will be £26,000 a year for a household with children living in it, and £18,200 for those without [1].

This council believes the cap is a punitive and unnecessary measure which penalises the poor whilst the government has failed to make the wealthy and major companies as Amazon and Starbucks pay their fair share for supporting the costs of running a fair and decent welfare system. It is estimated that 60% of those in receipt of benefits and tax credits are in some form of work. Rather than seeking to reduce the welfare bill by cutting benefits, the government should seek to increase wages taking people out of the need to make ends meet through benefits.

This council also notes the logistical difficulties the government is experiencing in delivering this ill-considered policy, including the recently delayed implementation date for the cap from April 2013 to as late as September 2013.

It is estimated that when it is implemented the cap will force around 300 of Brighton and Hove's poorest families out of their homes. The government has confirmed that they cannot be considered 'intentionally homeless' and so the council will have a duty of care to them. The council estimates the cost of housing these families will be approximately £1.1m in the first year alone.

This council also notes the Department for Communities and Local Government's 2011 New Burdens Doctrine, which states that:

"the Cabinet has agreed that all new burdens on local authorities must be properly assessed and fully funded by the relevant department... [this is] to ensure that the pressure on council tax is kept down"[2]

The Council therefore resolves:

- (1) To note that the benefit cap will unfairly penalise and dispossess the poorest families in our city and result in perverse additional costs to the public purse; and

- (2) Requests the Chief Executive to write to the senior ministers responsible in both the Department for Work and Pensions and the Department for Communities and Local Government seeking;
- (i) the abolition of the benefits cap,
  - (ii) to acknowledge that should it not be cancelled, the results of the benefit cap impose a new burden on local government; and
  - (iii) As such, this new burden should be funded by central government so that the council can support those affected by its introduction.”

Proposed by: Cllr J. Kitcat

Seconded by: Cllr Wakefield

Supported by: Cllrs Bowden, Buckley, Davey, Deane, Duncan, Follett, Hawtree, Jarrett, Jones, Kennedy, A Kitcat, Littman, Mac Cafferty, Phillips, Powell, Rufus, Shanks, Sykes and West.

[1]:<https://www.gov.uk/benefit-cap>

[2]:[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5960/1926282.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5960/1926282.pdf)