

# **Brighton & Hove City Council**

## **Authority Monitoring Report 2020/21**

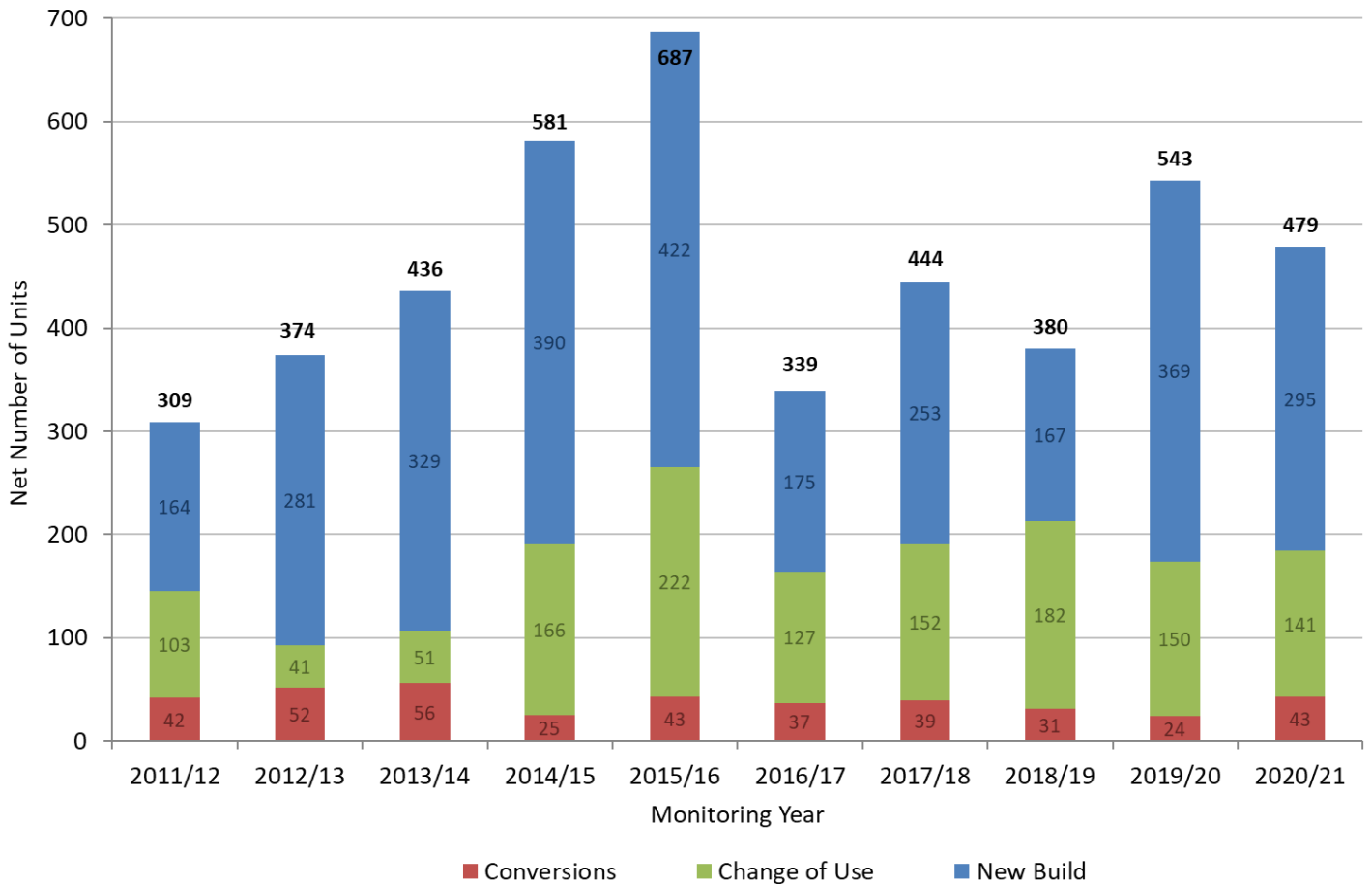
### **Residential Development**

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## 1. Residential Completions

**Chart 1: Net Completions by Development Type 2010/11-2020/21**



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There were 479 net housing completions in 2020/21 which falls short of the implied annual delivery rate of 660 dwellings per year required to meet the City Plan housing target. As a result, the implied annual rate has risen to 926 dwellings per year (Table 1). The 2020/21 completion figure represents a lower figure than the previous monitoring year but is second highest over the past five years (Chart 1).

**Table 1: City Plan Housing Requirement**

	Plan Requirement	Implied Annual Rate
<b>Plan Period 2010-2030</b>	13,200	660
<b>Remaining Period 2021-2030</b>	8,330 <sup>1</sup>	926

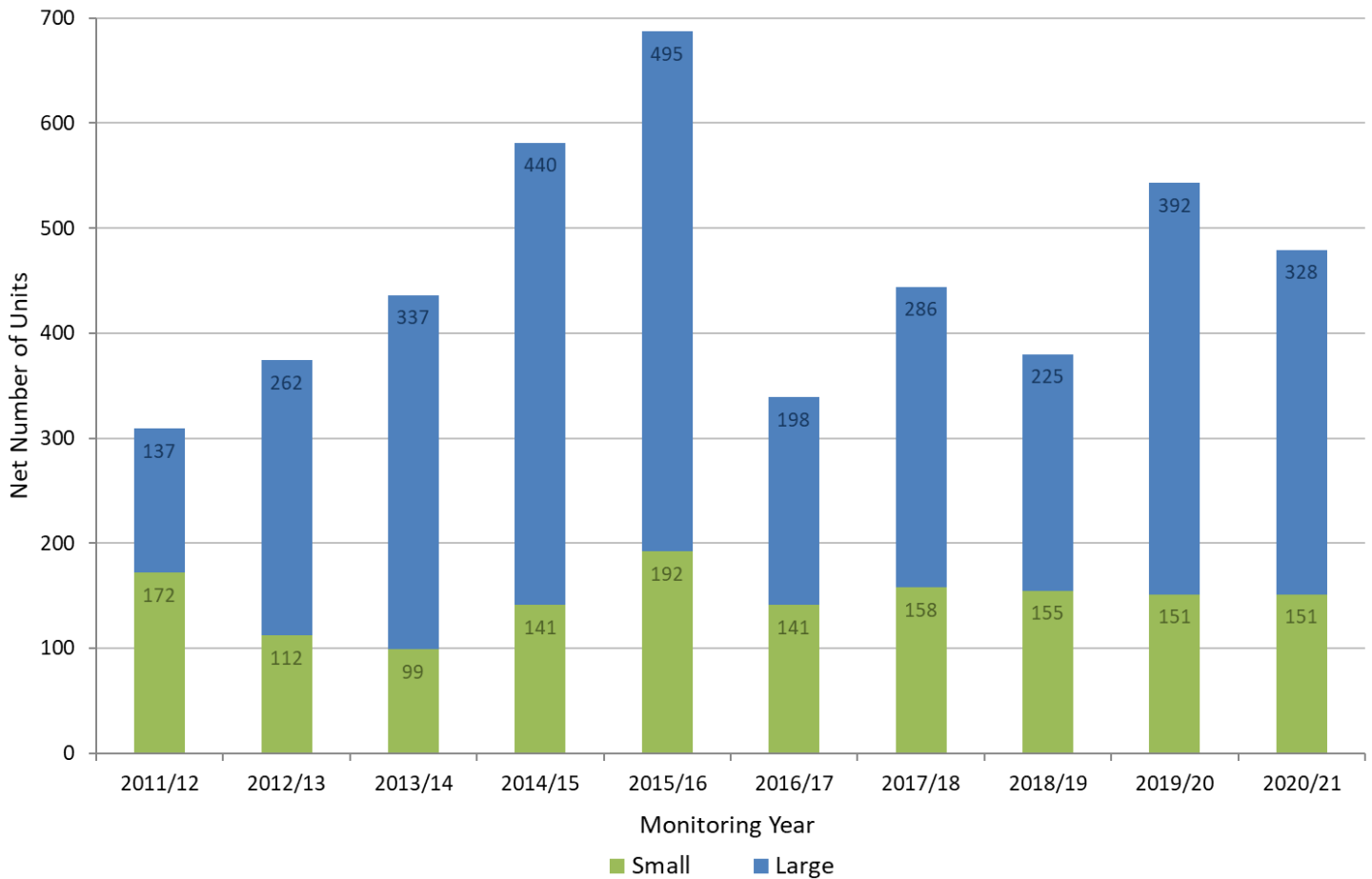
**BHCC 2021**

The highest proportion of housing delivery in 2020/21 was completed through new build developments, which provided a total of 295 net dwellings. This is a reduction on the

<sup>1</sup> Takes into account recorded supply net completions from 2011-2021 (4,870 units)

previous year and is the main reason for the overall fall in completed units from the previous year (Chart 1).

**Chart 2: Net Completions by Development Size 2010/11-2020/21**



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Compared to the previous monitoring year there has been a decrease in residential completions on large<sup>2</sup> developments whilst completions in small<sup>3</sup> developments remained at a similar level to previous years. Completions in large developments was the second highest in the previous five monitoring years (Chart 2) and is higher than the mean average over the past ten years. Of the 328 units completed on large sites 25 were within Development Areas, as defined in the City Plan (Policies DA1-DA8); these were all completed within DA4 through the development at City College, 87 Preston Road. The residential completions on sites of 10 or more dwellings are summarised in Table 2, these sites delivered a total of 310 units.

<sup>2</sup> Six units and over

<sup>3</sup> Five units and under

**Table 2: Major Developments Completed 2020/21**

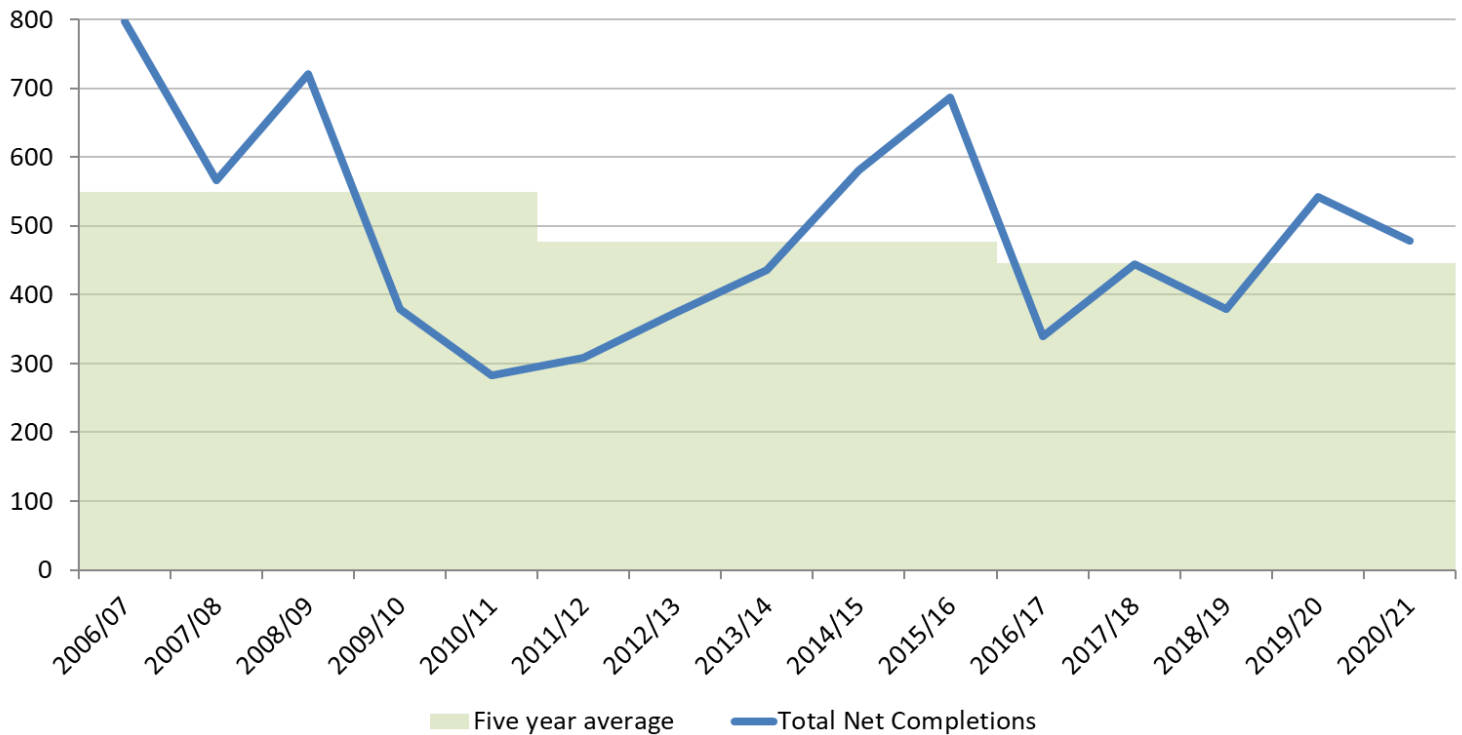
<b>Address</b>	<b>Development</b>	<b>Net Units Completed</b>
The Astoria, 10-14 Gloucester Place, Brighton	Demolition of existing building and construction of 70 residential units	70
South Street, Portslade	Mixed use development including 37 flats and 11 dwellings	48
Land Off Overdown Rise And Mile Oak Road, Portslade	39 units constructed of 125 dwellings proposed	39
Whitehawk Clinic, Whitehawk Road, Brighton	Demolition of Clinic building and erection of a building containing 38 dwellings	38
6 Falmer Avenue, Saltdean	Demolition of exiting house and stables and construction of 32 dwellings	31
251- 253 Preston Road, Brighton	Conversion, extension and refurbishment to existing to facilitate creation of 22 apartments and erection of 6 dwellings	28
City College, 87 Preston Road, Brighton	Change of use from education to 25 flats	25
The Coach House And 1-6 Lions Gardens, Withdean Avenue, Brighton	Demolition of existing dwellings and erection of building providing 26 residential apartments	19
76-79 And 80 Buckingham Road, Brighton	Conversion of 76-79 Buckingham Road to provide 14 dwellings	12

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Chart 3 illustrates the net annual residential completions in the city over the past 15 years. The average rate of residential completions over this period has been 488 units per year and average completions since the start of the City Plan period (2010/11) has been 441 units per year. Annual completion figures exceeded 500 units between 2006/07 and 2008/09. A drop in housing delivery between 2009/10 and 2013/14 reflected the impact that national recession and the subsequent economic uncertainty had on residential delivery. Annual completions then increased each year between 2010/11 until 2015/16. In 2016/17 the number of completions dipped again and has since remained below the required City Plan delivery rate of 660 units per year. Despite a year-on-year reduction in 2020/21 there remains evidence of a slight upward trend in completions since 2016/17. The numbers of residential units currently gaining planning permission and under construction suggest housing delivery should increase as development sites allocated in the City Plan and identified in the Strategic Housing Land Availability Assessment (SHLAA) are implemented

along with a continued supply through windfall sites. Detailed analysis of housing delivery in the city is provided in the council's most recent Housing Delivery Action Plan<sup>4</sup>.

**Chart 3: Total Residential Completions in Brighton & Hove 2006/07– 2020/21**

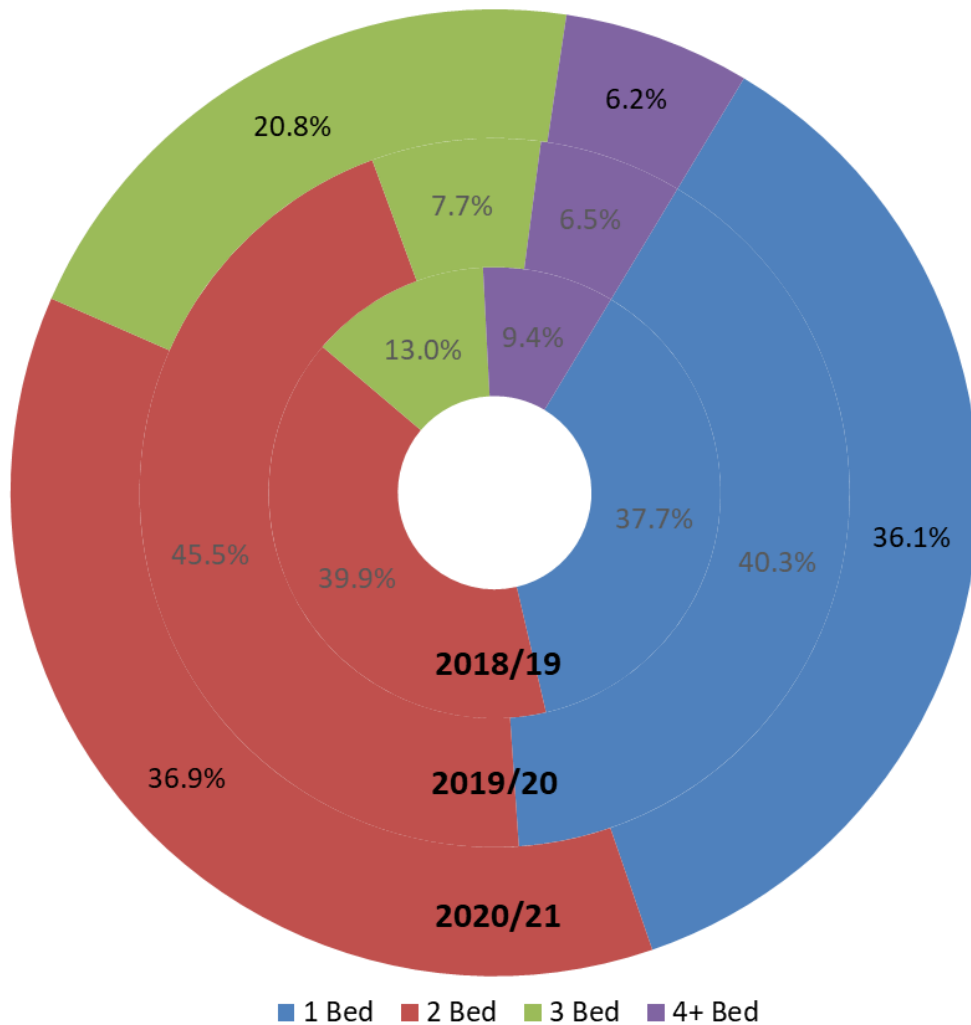


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In 2020/21 flats comprised 72 percent of new residential completions; 89 percent of which were two bed flats or smaller. Of the 28 percent completed as houses; 69 percent were three bed houses or larger. Overall, one and two bed units comprised 73 percent of the residential units completed in 2020/21. This is a lower percentage than in the previous two monitoring years (Chart 4), however a significantly higher proportion of smaller units are being completed compared to both the existing housing profile of the city (based on the 2011 Census) and the identified housing need for homes in the city over the plan period. This largely reflects the character of the sites available in the city, with a high proportion of constrained brownfield sites within the urban area and very limited opportunities for lower density greenfield development.

<sup>4</sup> [Brighton & Hove Housing Delivery Action Plan 2019](#)

**Chart 4: Proportion of Gross Number of Units per Unit Size 2018/19-2010/21**

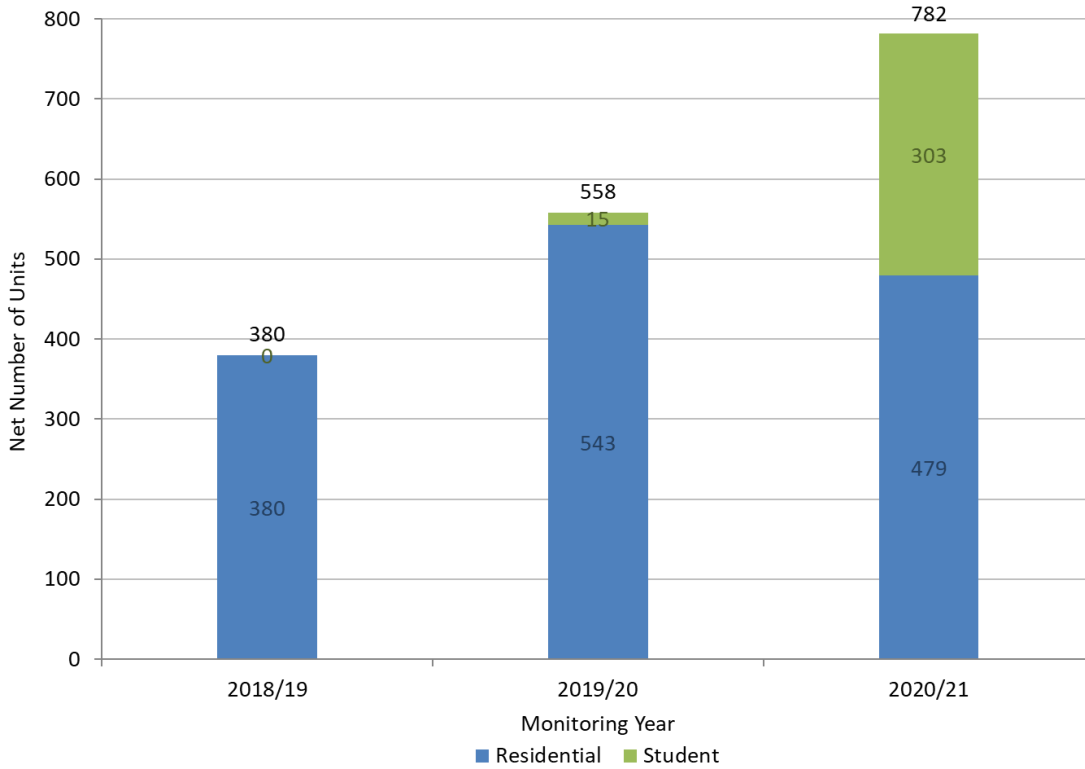


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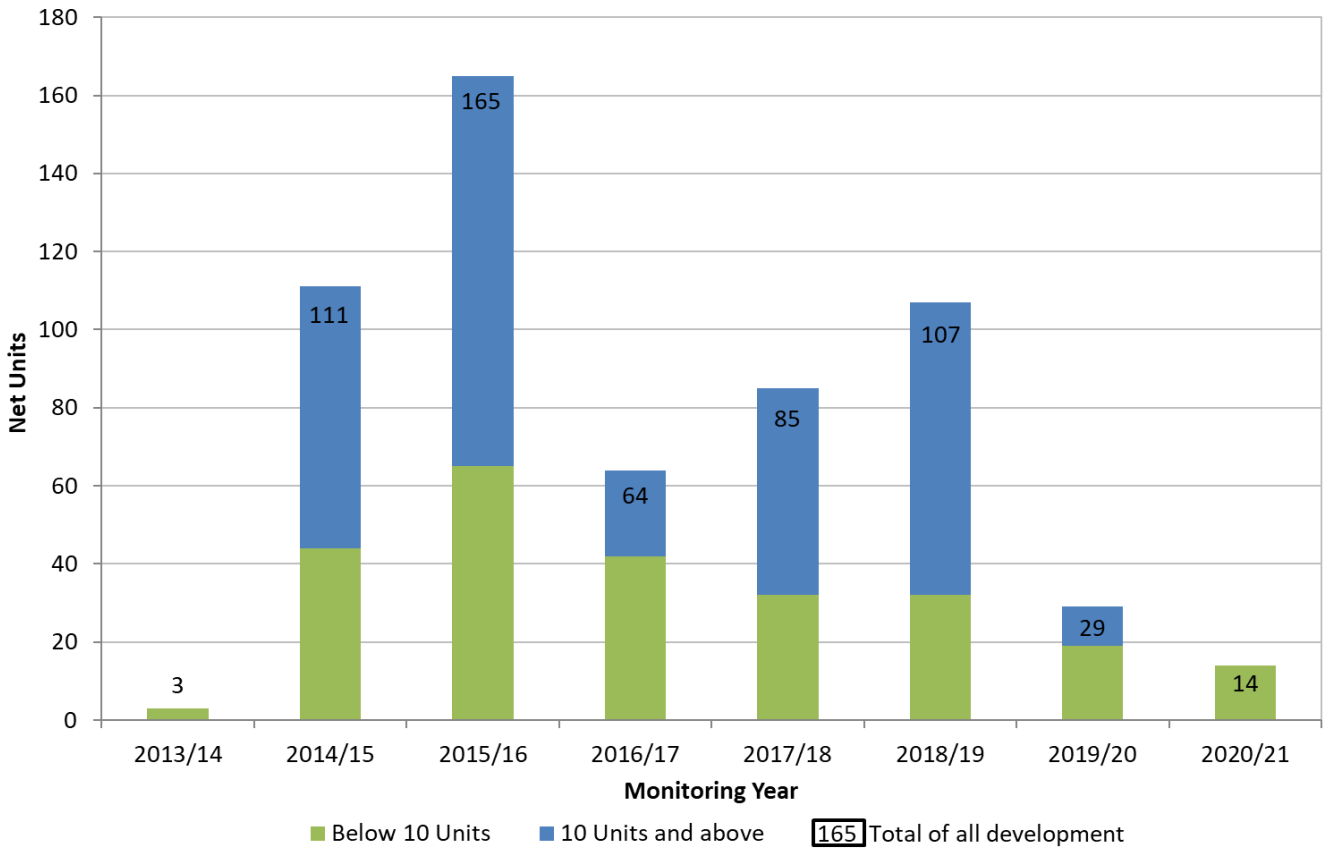
For the purposes of government housing completions data<sup>5</sup>, self-contained student accommodation has been included as part of the self-contained housing stock recorded in the housing supply data returns since 2018/19. With the inclusion of self-contained student accommodation, the total figure for self-contained residential accommodation increases to 782 units (Chart 5).

<sup>5</sup> Annual Housing Flows Reconciliations submitted by the council to central Government for monitoring housing completions and the Housing Delivery Test.

**Chart 5: Total Net Residential and Self-Contained Student Accommodation 2018/19-2020/21**



**Chart 6: Total Net Prior Approval Completions by Size 2013/14-2020/21**

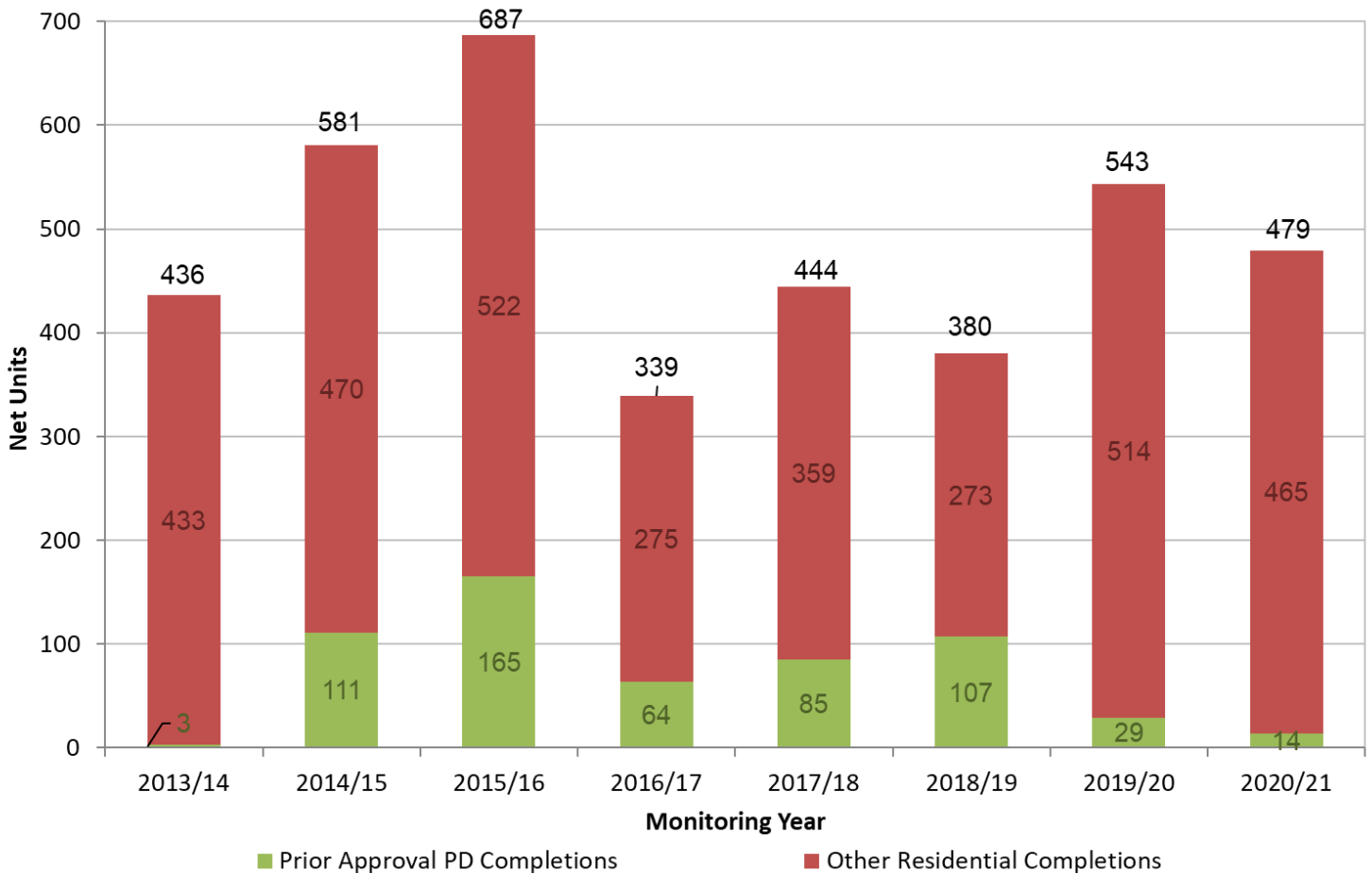


**165** Total of all development

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The permitted development right for a change of use from office to residential use was introduced in 2013 and was subsequently extended to include retail, financial and professional services, light industrial and storage or distribution uses. These developments require prior approval from the local authority but are not subject to the standard planning application process. A new permitted development right for the change of Commercial, Business and Service use (E use class) to residential use came into force in August 2021 which covers and extends the previous uses subject to the previous permitted development right.

**Chart 7: Prior Approval PD completions as a proportion of total net residential completions 2013/14-2010/21**



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Only 14 residential units were completed through permitted development in 2020/21 (Chart 6); the lowest number since the initial introduction of PD rights for office to residential in 2013. Ten of the units were the result of a change of use from office space. Although these rights have increased residential delivery since 2013/14, the council has limited controls to ensure that the residential units permitted meet amenity standards and cannot use planning policies to seek a proportion of affordable housing. Change of use to residential

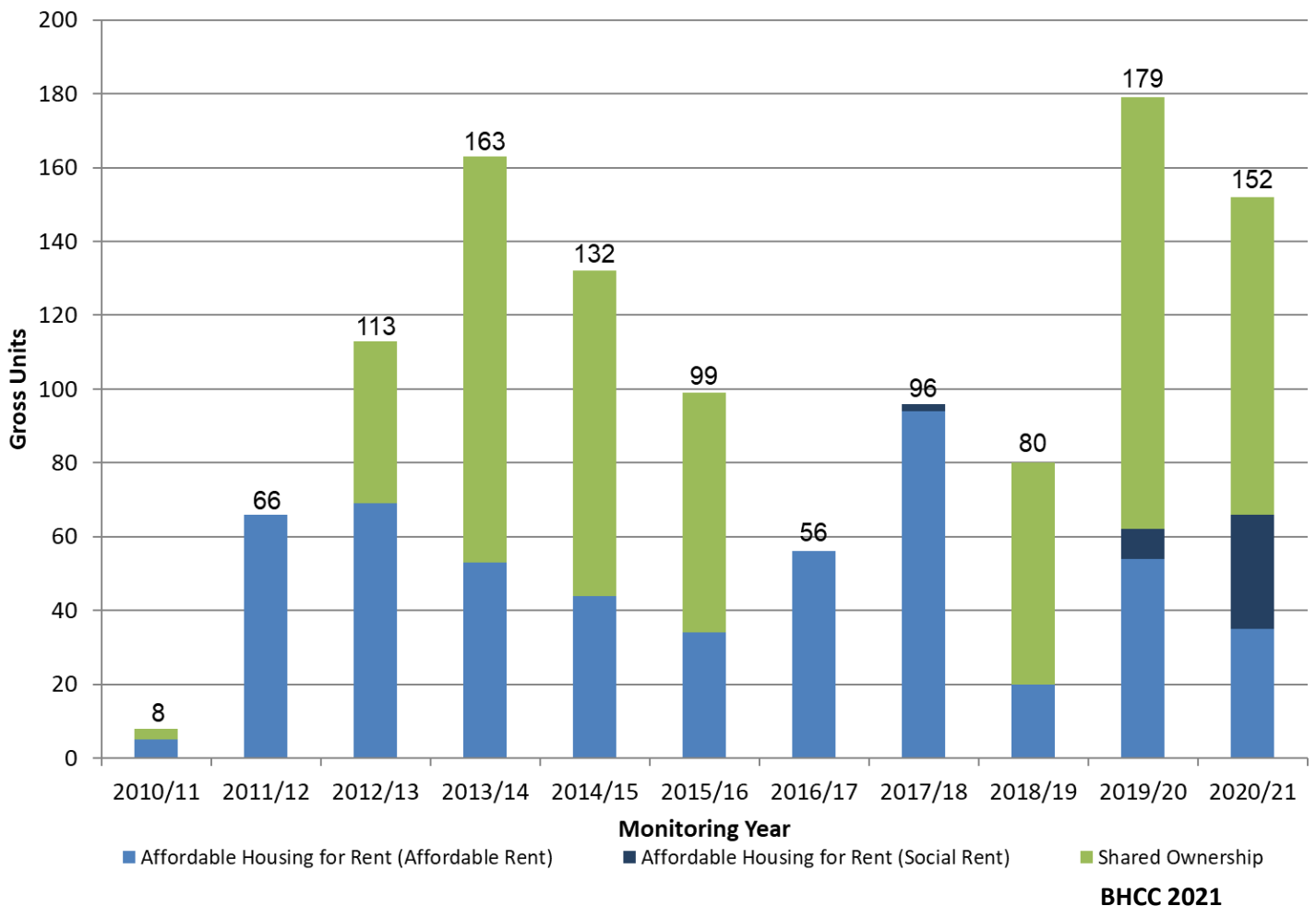


through permitted development also potentially reduces the supply of office space in the city.

## 2. Affordable Residential

Housing affordability is a major issue for many residents within the city as house prices in Brighton & Hove are high relative to local incomes. Policy CP20 in City Plan Part One requires the provision of affordable housing (or an equivalent contribution) as part of all developments of five or more dwellings. Affordable housing is defined as housing for sale or rent for households whose needs are not met by the market (e.g. affordable rented housing or shared ownership)<sup>6</sup>.

**Chart 8: Total Gross Affordable Completions by Tenure 2010-2021**



A total of 152 affordable homes were completed in 2020/21 (Chart 8), through eleven developments. This comprises 32 percent of all completions, the same percentage as the previous monitoring year. 147 affordable units were delivered through major developments

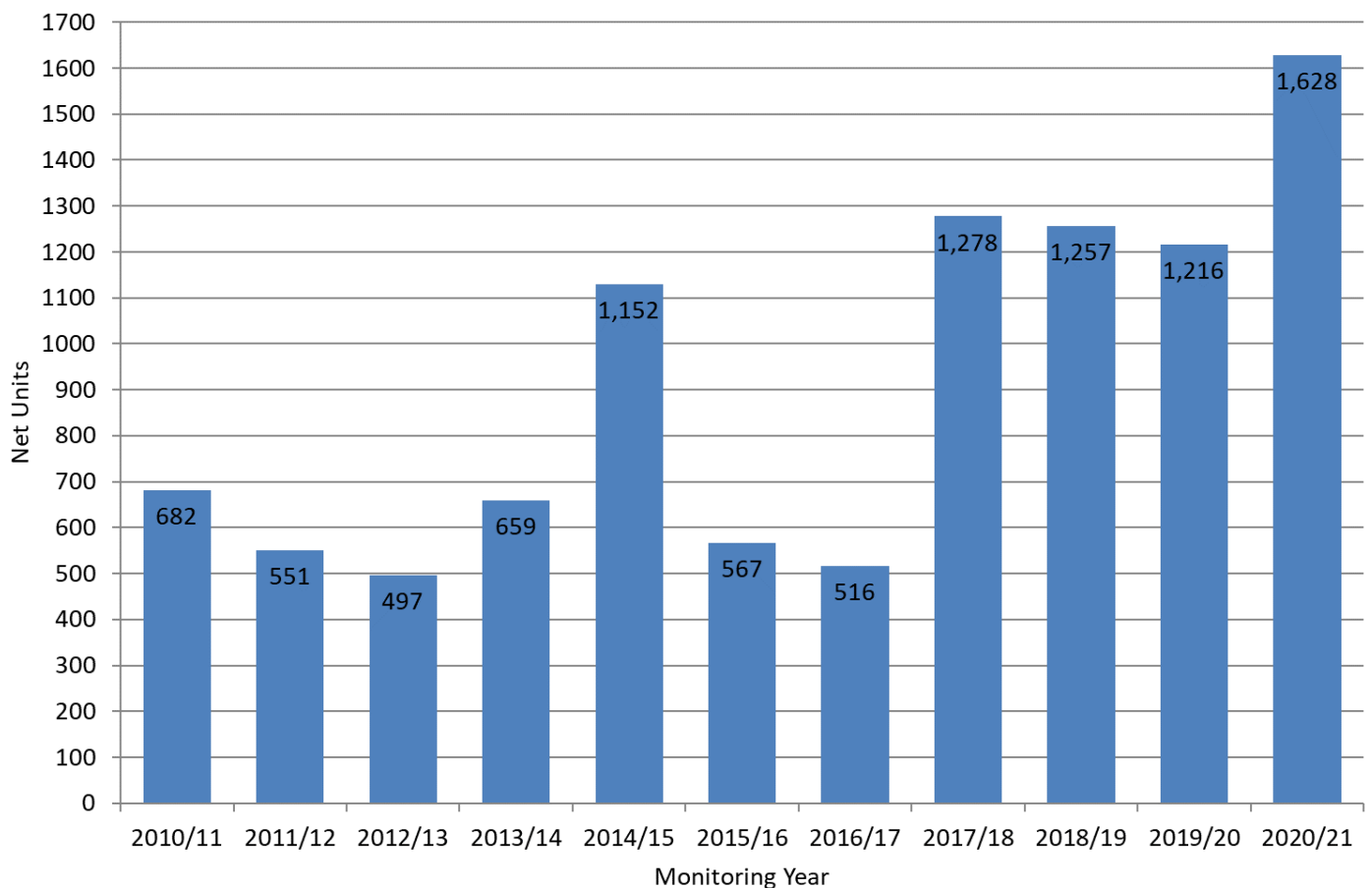
<sup>6</sup> [National Planning Policy Framework, Annex 2: Glossary, Affordable Housing, Page 64; MHCLG July 2018](#)

which represents 47 percent of all units on major developments. Of the eight completed major developments with affordable housing four were 100 percent affordable. Two major developments provided off-site affordable financial contributions in lieu of on-site affordable provision. 121 affordable units were completed in new build developments comprising 41 percent of all 'new build' completions. 43 percent of the affordable units were one-bed units, 38 percent were two-bed and 18 percent were three-bed.

### 3. Extant Permissions

There were 5,748 net housing units with extant permissions<sup>7</sup> at the end of March 2021; of which 3,416 units are in schemes that have commenced<sup>8</sup>. There were 1,532 net affordable housing units with extant permissions at the end of March 2021; with 1,056 units in schemes which have commenced.

**Chart 9: Number of New Residential Units Permitted<sup>9</sup> 2010/11-2020/21**



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There were 1,628 new net housing units permitted<sup>9</sup> in 2020/21 (Chart 9); 371 of which were affordable housing units. The increased number of residential units permitted and under

<sup>7</sup> Planning permissions which are still valid and able to be implemented

<sup>8</sup> Some sites are technical commencements or have remained commenced for an extended period of time, which, although are able to be implemented are likely not to continue to come forward on the current permission (approximately 400 units are estimated to meet this criteria).

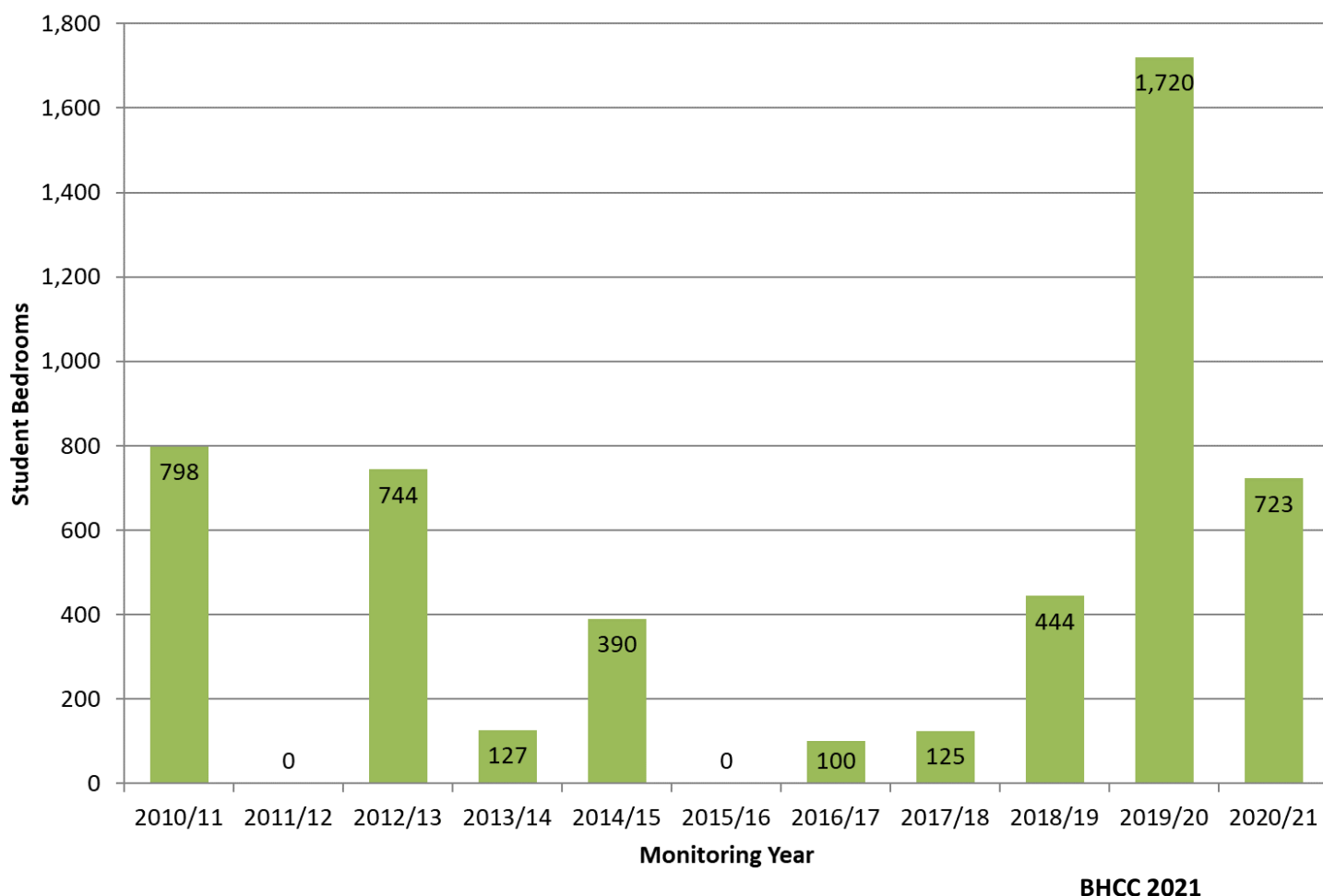
<sup>9</sup> All permitted units minus units superseded in monitoring year.

construction over the past four years is expected to lead to higher delivery rates in the coming years.

#### 4. Purpose Built Student Accommodation

Policy CP21 in City Plan Part One **Error! Bookmark not defined.** encourages the provision of purpose-built student accommodation (PBSA) to help meet the housing needs of the city’s students and help reduce the demand from students for Houses in Multiple Occupation (HMOs).

**Chart 10: Number of New Communal Student Bedrooms Completed 2010/11-2020/21**

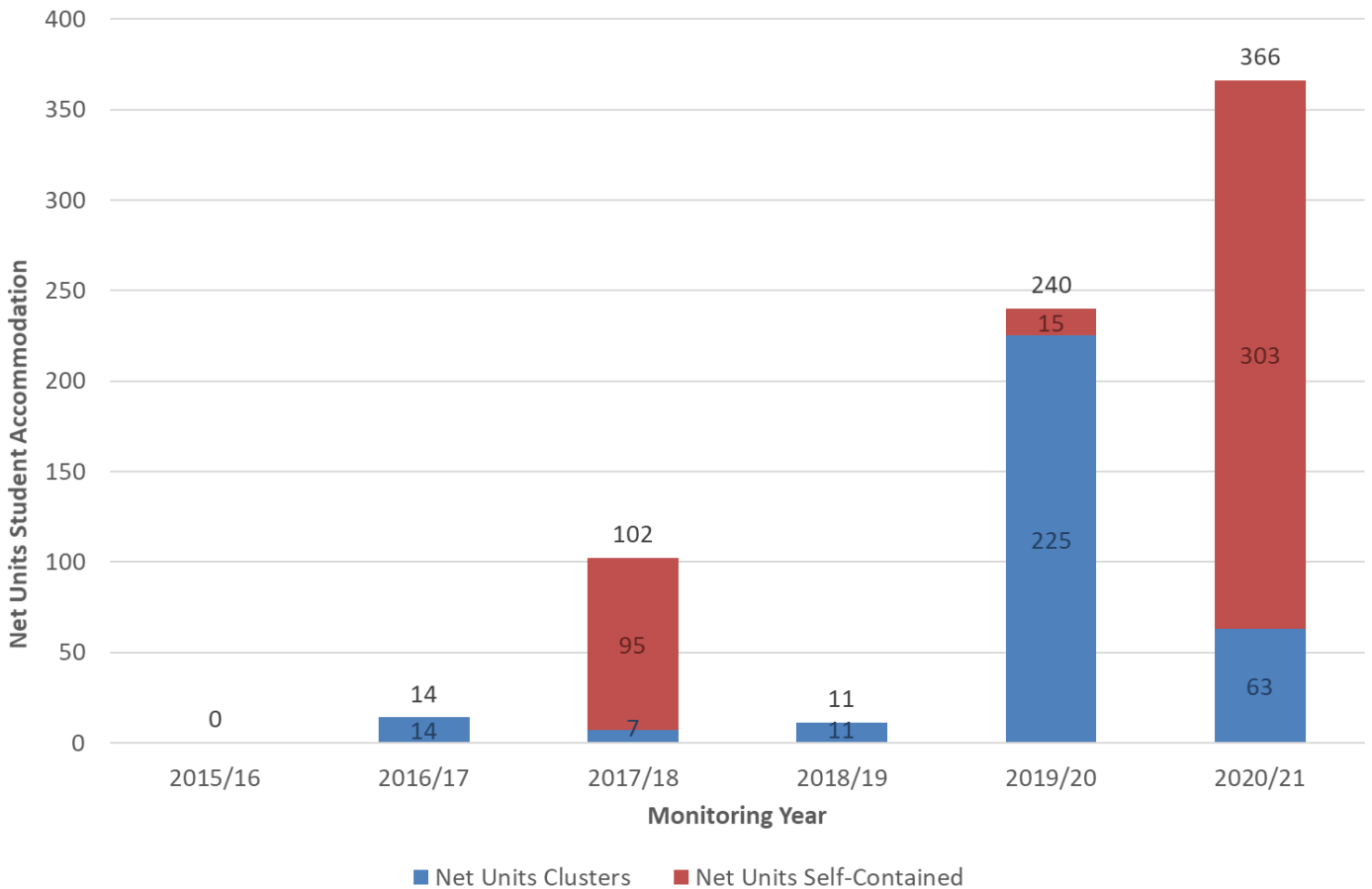


There were 723 net bedrooms completed in PBSA in 2020/21 (Chart 10) distributed in 63 cluster units<sup>10</sup> and 303 self-contained flats within PBSA (Chart 11). Although this is almost 1,000 rooms less than in the previous monitoring year it is the second highest number completed since 2012/13. The completed bedrooms are a result of the completion of student accommodation on two neighbouring developments on the Preston Barracks Site and at Pelham Terrace in Brighton. Since 2010/11; 5,171 new bedrooms have been created

<sup>10</sup> Bedrooms sharing living space

within Brighton and Hove. A further potential 2,712 bedrooms were under extant permission at the end of 2020/21, including 1,605 under construction.

**Chart 11: Number of New Communal Student Bedrooms Completed 2015/16-2020/21**



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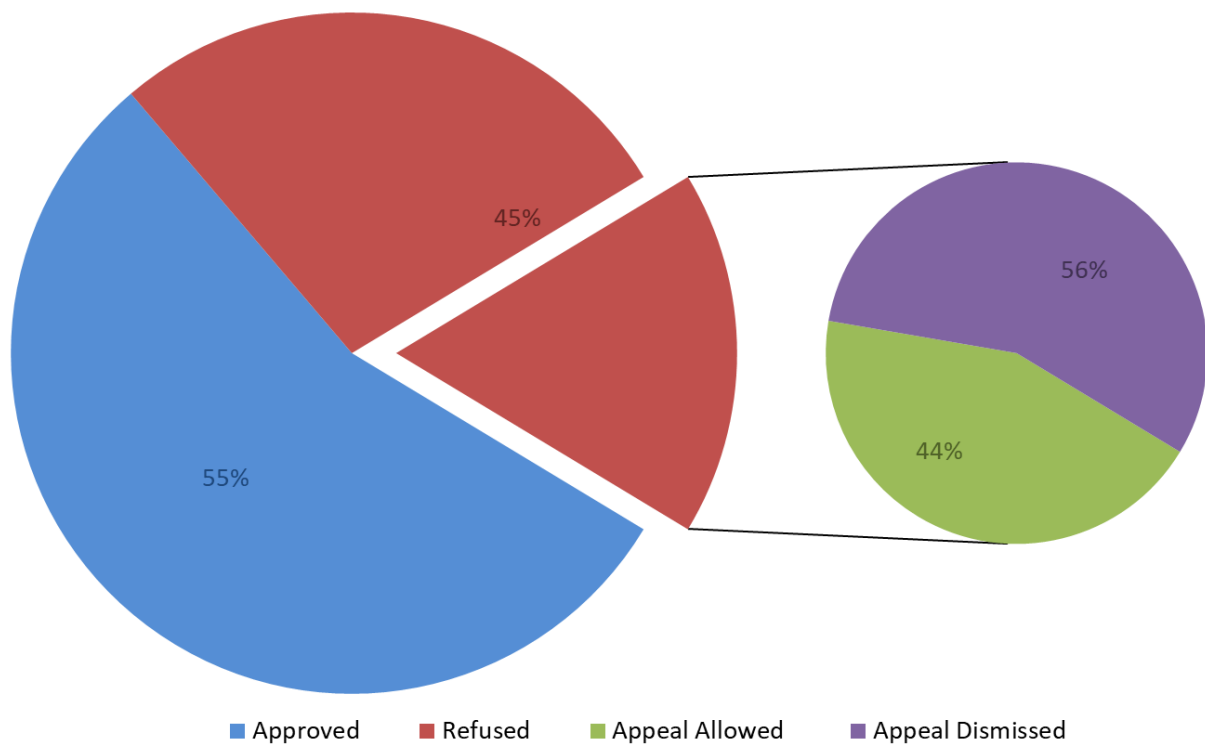
## 5. Houses of Multiple Occupation

There are over 3,200 licensed<sup>11</sup> Houses of Multiple Occupation (HMOs)<sup>12</sup> in the city. On 5 April 2013, an Article 4 direction relating to HMOs came into force in five electoral wards within Brighton and Hove requiring a planning application for any change of use from a single dwelling house to a small HMO. This enables the impact of concentrations of HMOs in certain areas of the city to be considered by the council when assessing proposals for new HMOs (Chart 12). A citywide Article 4 Direction came into force on 3 June 2020 in response to concerns about increasing proliferation of HMOs elsewhere in the city (Chart 13).

<sup>11</sup> <https://www.brighton-hove.gov.uk/housing/private-housing/hmo-licence-registers>

<sup>12</sup> Properties lived in by three to six people where facilities such as a kitchen or bathroom are shared

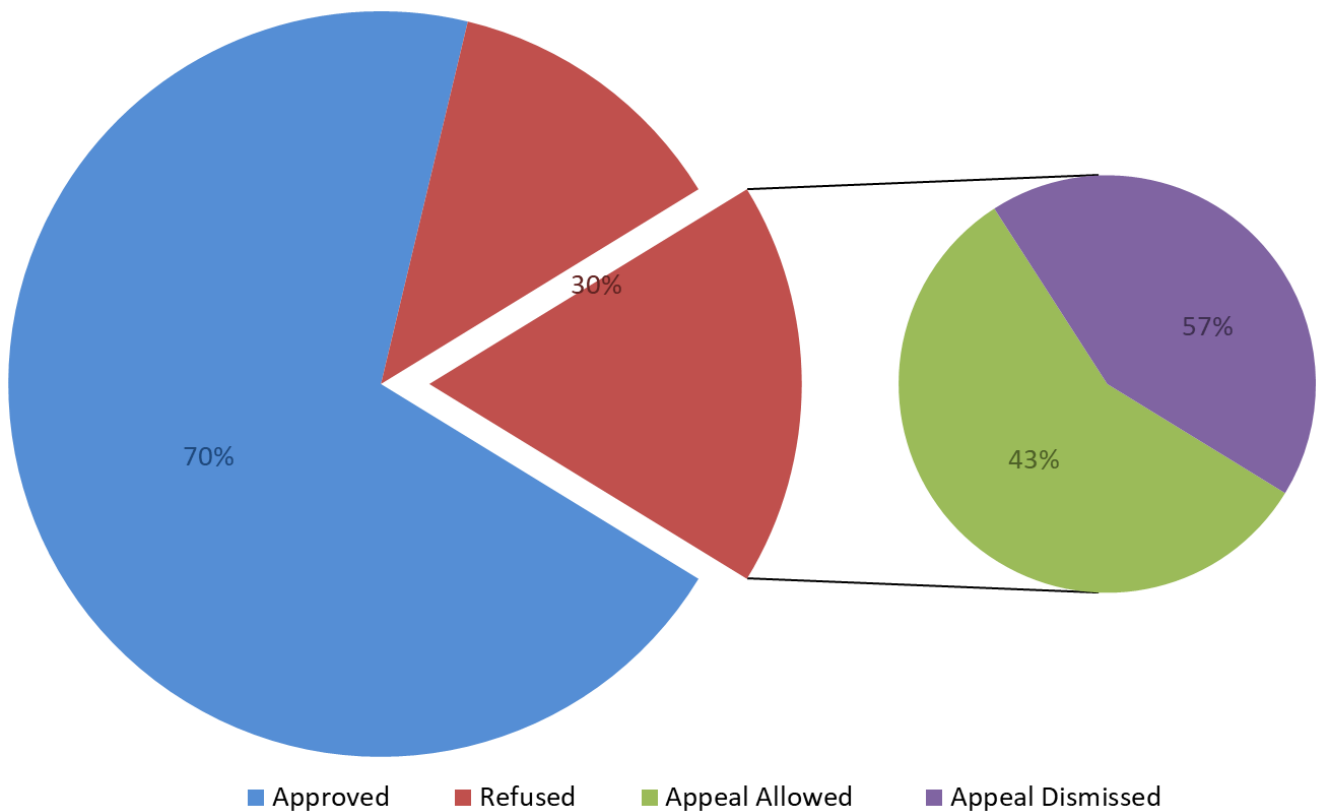
**Chart 12: Decisions on HMO applications in initial five Article 4 Wards 2013/14-2020/21**



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There have been 341 planning applications, 188 approved and 153 refused, for the change of use of a single dwelling house to a small HMO, between April 2013 and March 2021, in the five wards designated with an Article 4 Direction in April 2013 (Chart 12). Of those refused, 59 have been subject to an appeal, of which 26 have been allowed. This suggests that since the implementation of that Article 4 Direction almost forty percent of applications have been considered to have a potentially negative impact. In 2020/21 there were 41 HMO applications decided in these areas in which 26 applications were approved and 15 were refused; nine of those refused have been appealed, of which five were allowed.

**Chart 13: Decisions on HMO applications from City-Wide Article 4 from June 2020 to April 2021**



**BHCC 2021**

Between the implementation of the citywide Article 4 Direction, on 3 June 2020, and the end of the monitoring year there have been 40 planning applications, 28 approved and 12 refused, for the change of use of a single dwelling house to a small HMO (Chart 13). Of those refused, seven have been subject to an appeal, of which four have been allowed. 28 (70 percent) of those applications were located in the original five Article 4 wards and 12 (30 percent) were in the remaining wards in the new city-wide Article 4. Of those in the original Article 4 wards 39 percent were refused compared to eight percent in those remaining wards.

## **6. Gypsy and Traveller Provision**

Policy CP22 'Traveller Accommodation' in City Plan Part One sets out the council's approach to providing traveller accommodation based on assessments of local need.

An updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) was published in 2019<sup>13</sup>, details of which are outlined in the 2018/19 AMR. A joint site search exercise undertaken by BHCC and the SDNPA in 2016-17 did not identify any suitable and available sites. No neighbouring authorities have indicated any ability to assist in meeting the unmet need via the Duty to Cooperate process.

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<sup>13</sup> [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment : BHCC and the SDNPA December 2014](#)