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authority monitoring report

2018-2019

Residential Development



Brighton & Hove
City Council

Brighton & Hove City Council

Authority Monitoring Report 2018/19

Residential Development

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1. Housing Requirement

- 1.1. The City Plan¹ sets out a minimum housing requirement of 13,200 new homes to be built over the plan period 2010-2030. The City's objectively assessed housing need (OAN) is 30,120² new homes over the plan period. The OAN figure does not take into account the very significant constraints on the capacity of the city to accommodate this amount of development; as a consequence the minimum housing requirement reflects the capacity for housing in the city for a sustainable mix of homes while providing other essential development and respecting the historic, built and natural environment of the city.

Table 1: City Plan Housing Requirement

	Plan Requirement	Implied Annual Rate
Plan Period 2010-2030	13,200	660
Remaining Period 2019-2030	9,367 ³	852

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- 1.2. Table 1 compares the City Plan Part One housing requirement for the entire plan period with the remaining residual requirement once housing completions from 2010/11 to 2018/19 have been taken into account. Housing delivery since 2010 has fallen below the required delivery rate and as a result the implied annual rate has risen to 852 dwellings per year.
- 1.3. The 2019 revision of the National Planning Policy Framework (NPPF) included the introduction of a Housing Delivery Test (HDT) which measures Local Planning Authorities (LPAs) housing delivery over the previous 3 years in comparison to the local plan housing target. If delivery falls below 95% of the target the LPAs are required to publish a Housing Delivery Action Plan (HDAP). For the period 2015/16 to 2017/18 housing delivery for Brighton & Hove was only 77% of the annualised City Plan target and the Council was, therefore, required to publish an HDAP⁴. The HDAP provides an overview of housing delivery in the city, assesses the main barriers and constraints to housing delivery, and sets out actions which the Council is undertaking to help improve delivery in the future. The housing land supply position will continue to be monitored and assessed in accordance with the Housing Implementation Strategy (HIS)⁵ and through annual reviews of the Strategic Housing Land Availability Assessment (SHLAA).
- 1.4. The council is continuing to work with neighbouring authorities to explore opportunities for meeting the city's outstanding housing requirements outside the city as part of a 'duty to co-operate'. This includes taking forward the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area⁶ and the sub-regional work of the Greater Brighton Economic Board including the Greater Brighton City Deal⁷ to identify long-term opportunities for meeting unmet housing needs. .

¹ [Brighton and Hove City Plan Part One \(March 2016\)](#)

² [Objectively Assessed Need for Housing: Brighton & Hove \(GL Hearn Limited 2015\)](#)

³ Takes into account recorded supply net completions from 2010-2019 (3,833 units)

⁴ [Housing Delivery Action Plan \(BHCC 2019\)](#)

⁵ Latest HIS revised September 2014 as part of part of Proposed Modifications to City Plan

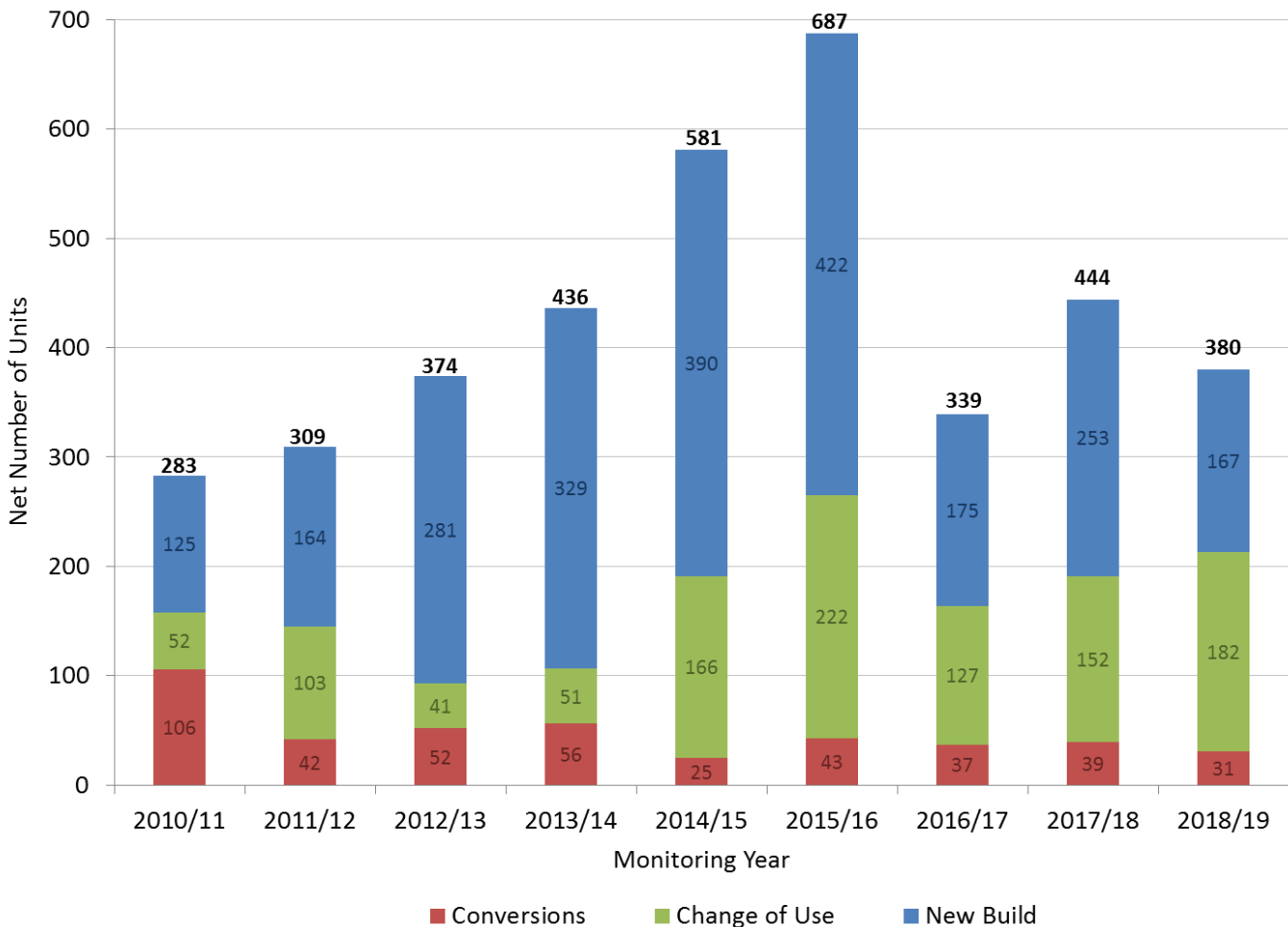
⁶ [Local Strategic Statement \(CWS&GB 2013\)](#)

⁷ [Greater Brighton City Deal \(Greater Brighton Economic Board 2014\)](#)

2. Residential Completions

2.1. There were 380 net housing completions in 2018/19 which falls short of the delivery rate required to meet the City Plan housing target. The 2018/19 completion figure represents a decrease on the 444 net completions in 2017/18 although it is above the 339 completed in 2016/17 (Chart 1).

Chart 1: Net Completions by Development Type 2010-2019



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2.2. The highest proportion of housing delivery in 2018/19 was completed through change of use developments, over half of which were through prior approval change of use applications. Completions on new build sites reduced in the 2018/19 monitoring year with the number completed on these sites at the lowest level since 2011/12.

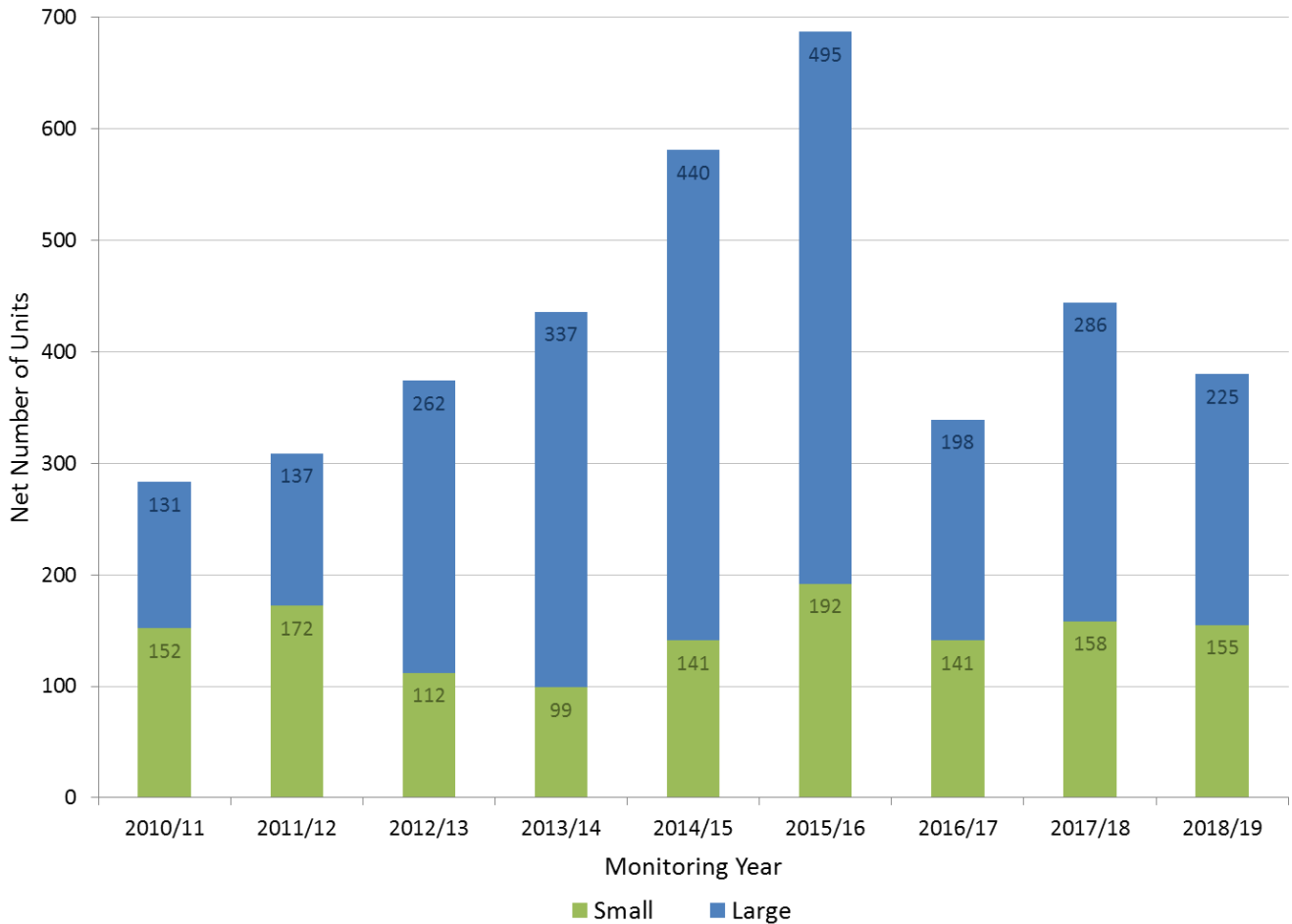
2.3. There was a reduction in the number of completions on both large⁸ and small⁹ developments in comparison to the previous monitoring year, although completions in both categories were higher than in 2016/17. Completions on small sites have remained above the average since 2010 as well as the average over the past five years (Chart 2).

⁸ Six units and over

⁹ Five units and under

2.4. Of the 225 units completed on large sites, there were 158 units completed within Development Areas, as defined in the City Plan (Policies DA1-DA8), and 67 units completed outside the Development Areas.

Chart 2: Net Completions by Development size 2010-2019



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- 2.5. Completions were delivered through 107 small applications and 14 large applications. There were residential completions on four major¹⁰ sites in the monitoring year; which are summarised in Table 2; these sites delivered a total of 152 units.
- 2.6. Although housing completions remained below the required delivery rate in 2018/19, the number of residential units under construction and those gaining planning permission both increased compared to previous monitoring years (see Sections 4 and 5), indicating that completion figures are likely to increase in forthcoming years.

¹⁰ Ten units and over

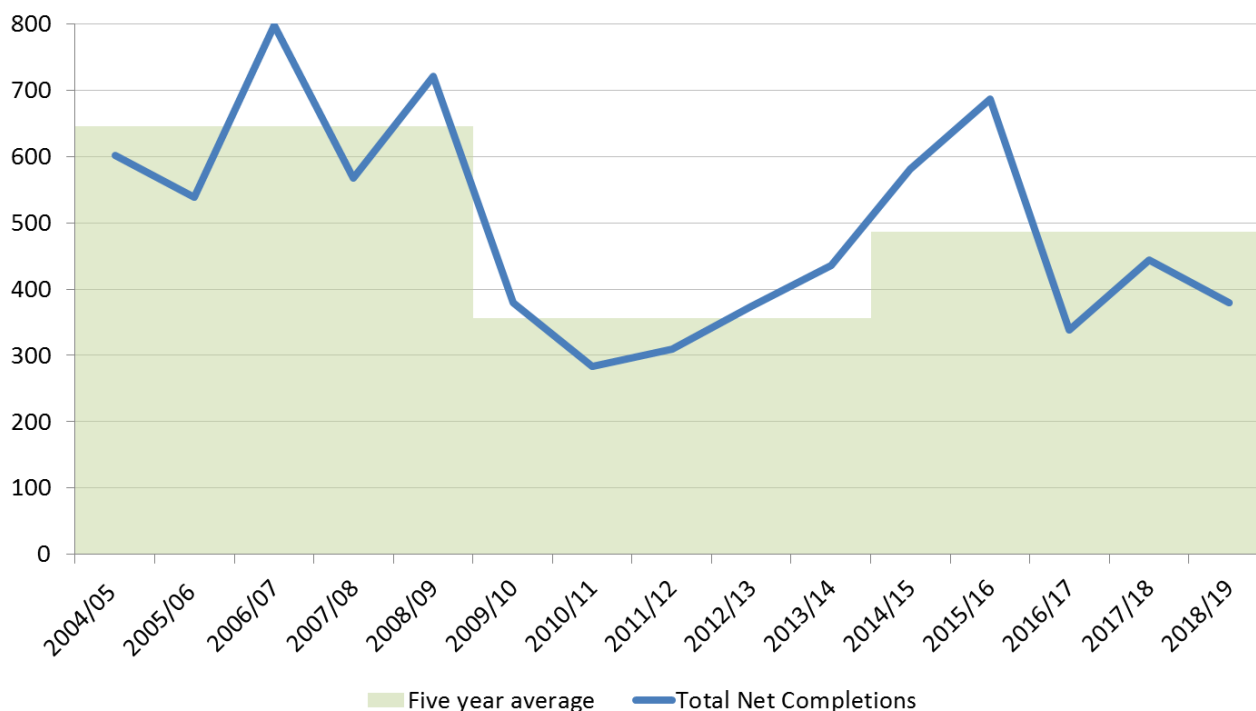
Table 2: Major Developments Completed 2018/19

Address	Development	Net Units Completed
70 Goldstone Lane, Hove	Redevelopment of site providing office space, 59 apartments and 6 houses.	65
Prestamex House, 171 - 173 Preston Road, Brighton	Prior approval for change of use from offices to 63 flats.	63
Car Parking at Kensington Street, Brighton	Erection of 12 residential units.	12
123 - 129 Portland Road Hove	Prior approval for change of use from offices to 12 apartments.	12

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2.7. Chart 3 illustrates the annual residential completions in the city over the past 15 years. The average rate of residential completions over this period has been 496 units per year and average completions since the start of the City Plan period (2010/11) has been 426 units per year.

Chart 3: Total Residential Completions in Brighton & Hove 2004/05 – 2018/19



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2.8. Annual completion figures exceeded 500 units in every year from 2004/05 to 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. In spite of this annual completions increased each year between 2010/11 until 2015/16; when the third highest number of residential units in the past 15 years were completed. In 2016/17 the number of completions dipped again, and has since remained well below the required City Plan delivery rate of 660 units per year.

2.9. As noted above, there is now evidence of an upward trend in terms of residential units under construction and gaining planning permission. It is anticipated that figures for housing delivery will increase as development sites allocated in the City Plan and identified in the Strategic Housing Land Availability Assessment (SHLAA) are implemented. In addition, the council itself is working to develop new affordable housing on council owned land through its Estate Regeneration Programme (New Homes for Neighbourhoods) and through a joint venture partnership with Hyde Homes (Homes for Brighton & Hove). There will also be a continuing supply through small windfall sites and other sources of windfall supplementing the identified supply.

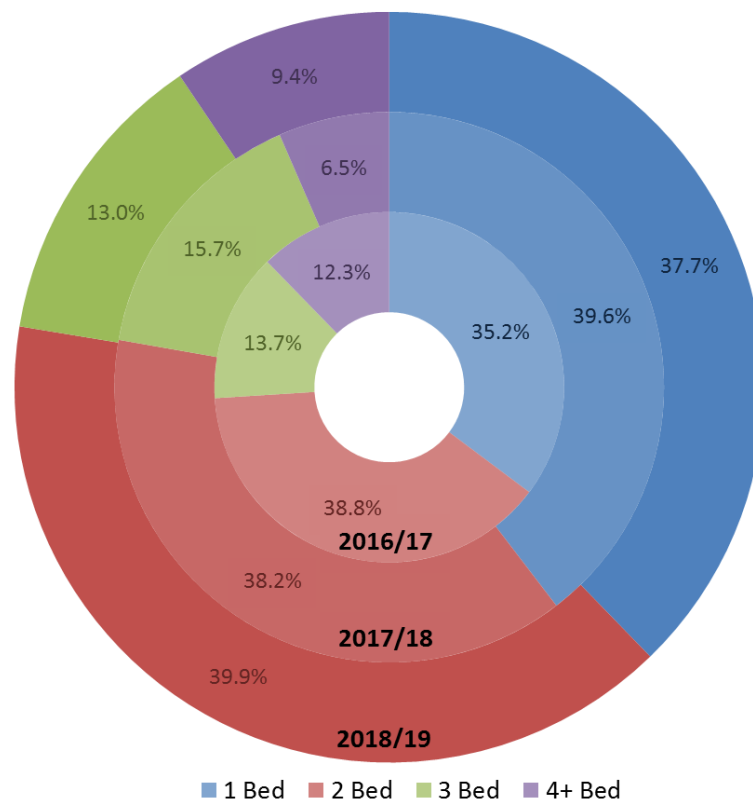
Table 3: Gross Number of Units by Unit Size 2018/19

Beds	Studio	1 Bed	2 Bed	3 Bed	4 or more Bed	Total
Flat	23	133	147	20	1	324
House	N/A	4	22	35	30	100
Total	23	137	169	55	31	424

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2.10. Table 3 describes the number of residential completions (gross) by unit size over the 2018/19 monitoring year. Flats comprised 76 percent of new residential completions. Of the 24 percent completed as houses 65 percent were three bed houses or larger. One and two bed units comprised 78 percent of the residential units completed in 2018/19 which is the same as in 2017/18. The percentage breakdown of units by size has remained broadly similar over the previous four monitoring years (Chart 4).

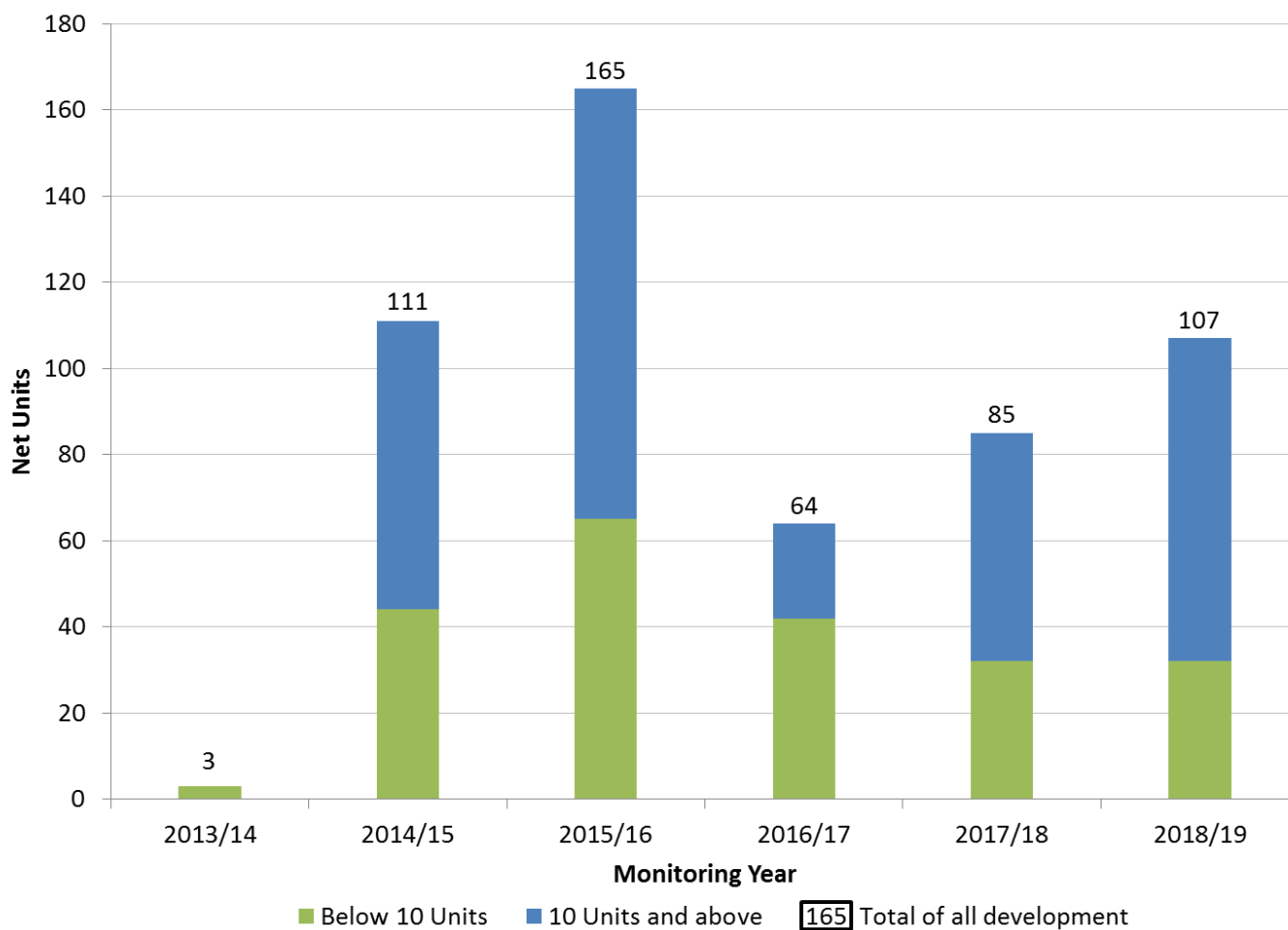
Chart 4: Proportion of Gross Number of Units per Unit Size 2016-2019



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2.11. The permitted development right for a change of use from office to residential use was introduced in 2013. This was extended in 2014 to include a change of use from retail or financial and professional services; under 150m², to residential use. Further changes were made in 2015 to include changes from storage or distribution centres, under 500m², to residential for a temporary period until June 2019 and again in 2016 to add a change of light industrial use to residential between October 2017 and October 2020¹¹. These developments require prior approval from the local authority but are not subject to the normal planning application process.

Chart 5: Total Net Prior Approval Completions by Size 2013-2019



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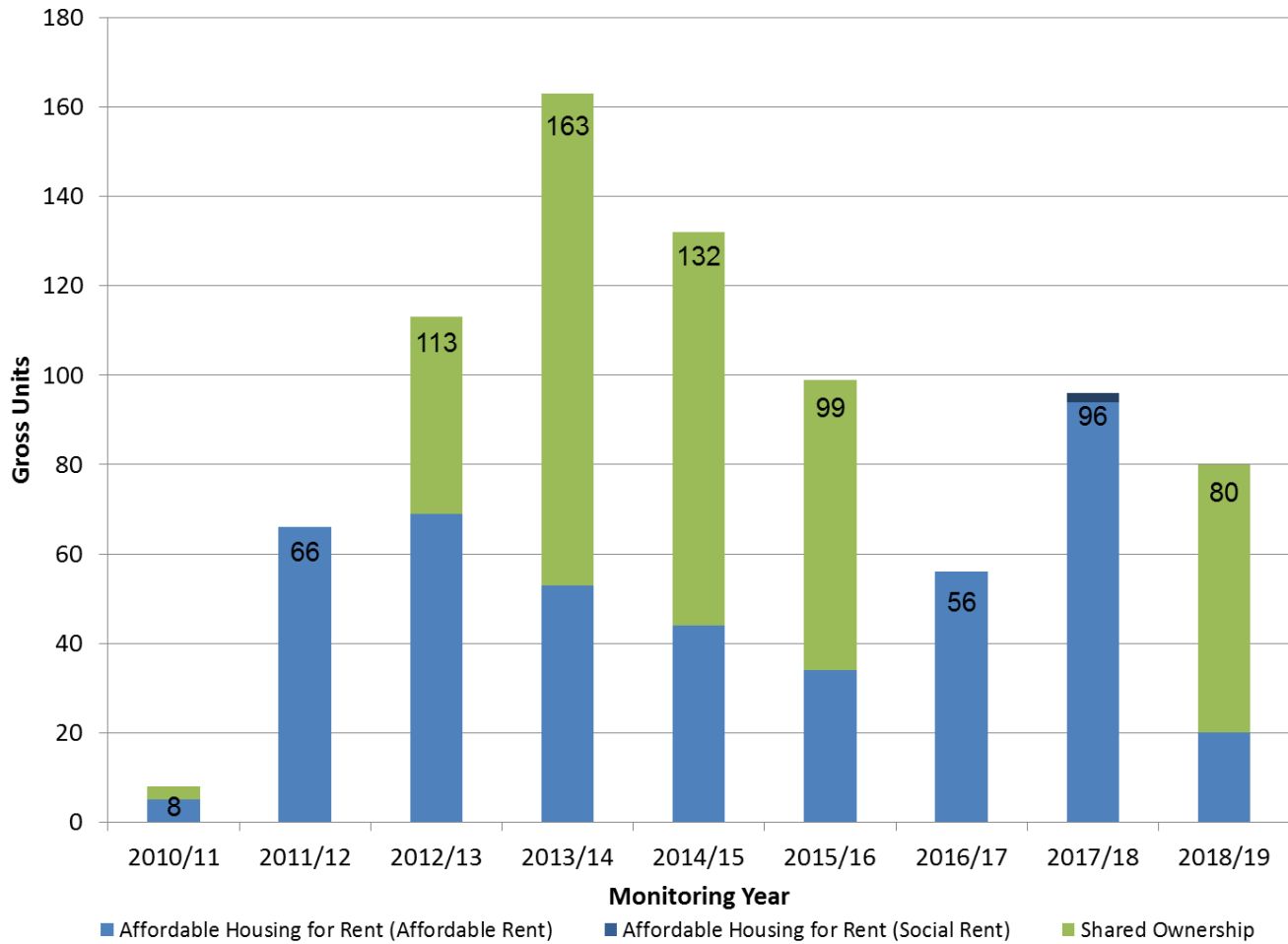
2.12. Over a quarter of all residential completions in the monitoring year were delivered through permitted development including a change of use from offices to 63 flats at Prestamex House, Brighton. Although these rights have increased residential delivery, the council has no power to ensure that the residential units permitted meet basic accommodation standards or provide a proportion of affordable housing. Change of use to residential through permitted development also potentially reduces the supply of office space in the city.

¹¹ www.legislation.gov.uk (General Permitted Development England Legislation)

3. Affordable Residential

3.1. 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 One¹ 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)¹².

Chart 6: Total Gross Affordable Completions by Tenure 2010-2019



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3.2. A total of 80 affordable homes were completed in 2018/19 through three developments. This included 68 units provided through two private developments at 70 Goldstone Lane, Hove (26 affordable units) and 121-123 Davigdor Road (42 affordable). For the latter development, the residential element was recorded as completed in the previous monitoring year (2017/18) however, a change of S106 terms was agreed in August 2019 to provide 42 on-site affordable homes instead of a commuted sum of £1,218,000 towards off-site affordable housing provision. The remaining 12 affordable units were from a council

¹² [National Planning Policy Framework, Annex 2: Glossary, Affordable Housing, Page 64; MHCLG July 2018](#)

development at Kensington Street which provided 100 percent affordable housing as part of the New Homes for Neighbourhoods programme.

4. Residential Commencements

4.1. At the end of the monitoring year, 1,776 net housing units were under construction. This represents an increase on increase on the previous year and continues an upward trend in commenced development since 2013/14 (Table 4). Work started on 562 units in 2018/19. This is below the high figure for starts in the previous year, but broadly similar to the other years since 2013/14. The increasing number of residential units under construction is expected to lead to higher delivery rates over the next few years.

Table 4: Net Residential Units Commenced 2013/14 to 2018/19

Year	Residential Commenced at Monitoring Year End (Units)	Residential commencements during year (Units)
2013/14	657	439
2014/15	837	602
2015/16	1,011	554
2016/17	1,088	507
2017/18	1,609	968
2018/19	1,776	562

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4.2. Major developments under construction in 2018/19 will provide 1,295 units, 623 of which commenced during the monitoring year. These sites are listed in Table 5.

Table 5: Major Developments, Under Construction 2018/19

Address	Development	Net Units:	Year Commenced:
Preston Barracks, Mithras House and Watt Building Lewes Road	Demolition of existing buildings and construction of mixed use development including Student and 369 residential units	363	2017/18
Land at Brighton Marina comprising Outer Harbour, West Quay and adjoining land, Brighton	Phase 2: 244 flats plus crèche, community room and youth space, visitor centre and viewing platform (Phase 2 of development for 853 flats)	244	2009/10
Circus Street Development, Brighton	Demolition of existing buildings and replacement with a mixed use development including 142 residential apartments	142	2015/16
Westerman Complex, School Road, Hove	Demolition of existing buildings and erection of 104 dwellings and office space	104	2018/19
The Astoria 10-14 Gloucester Place Brighton	Demolition of existing building and construction of a new building to form 70 residential units	70	2017/18

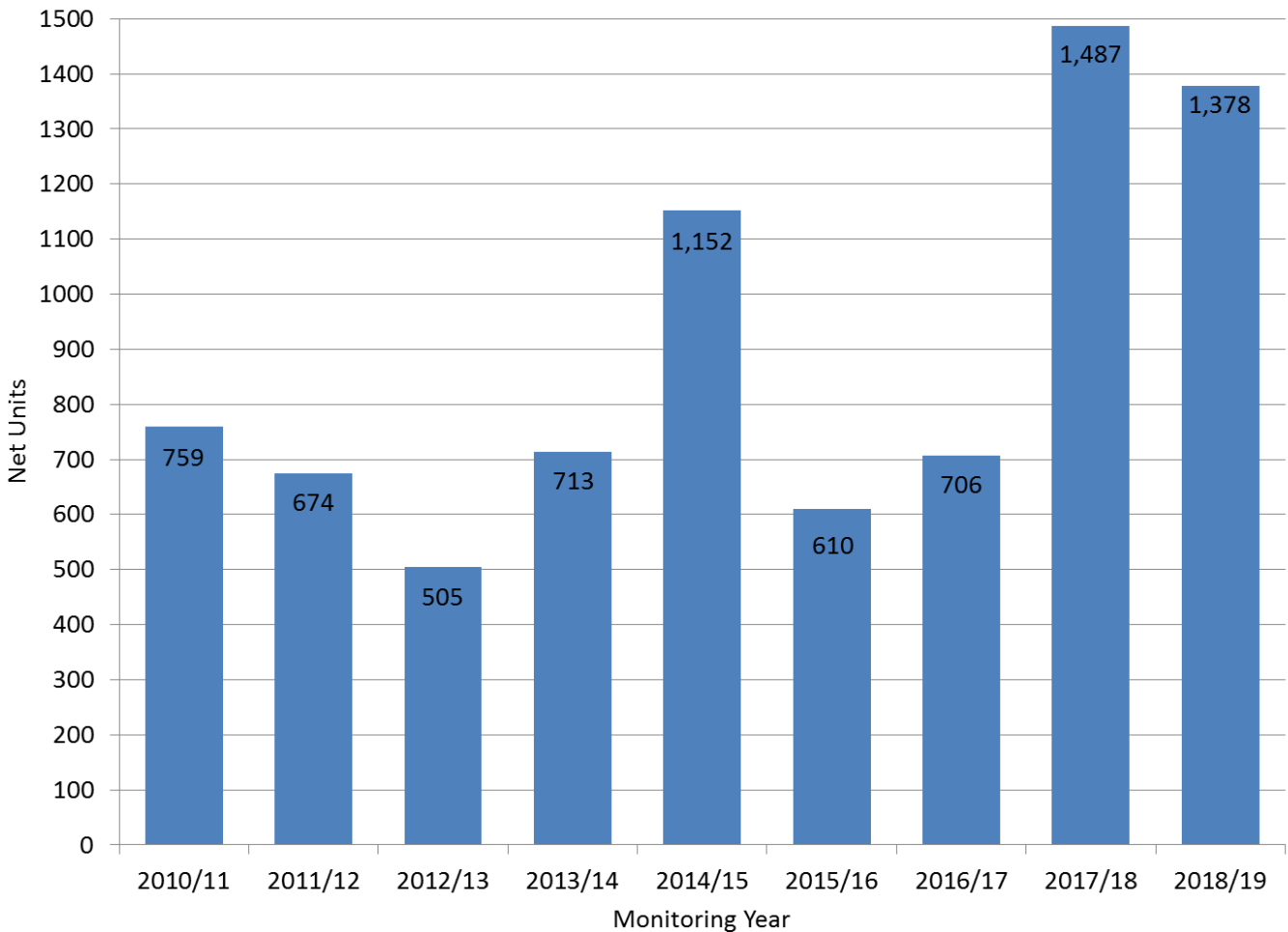
Address	Development	Net Units:	Year Commenced:
Court Farm House, King George VI Avenue	Demolition of existing buildings and erection of 69 flats	69	2017/18
113-119 Davigdor Road, Hove	Demolition of existing building and construction of a new building providing 68no residential units and office space	68	2018/19
Former Texaco Garage Site, 133 Kingsway, Hove	Proposed demolition of garage and erection of 55 residential apartments and retail floorspace.	58	2017/18
9-16 Aldrington Basin/Land South of Kingsway Basin Road North Portslade	Demolition of business unit and erection of mixed use commercial premises and 52 residential units.	52	2016/17
Saunders Glassworks Sussex Place Brighton	Erection of a block of flats, two bungalows and a house comprising a total of 49 units	49	2013/14
Former Brewery Site South Street Portslade	Demolition and conversion of existing to 37 self-contained flats, 11 new dwellings, employment floorspace.	48	2018/19
Lansdowne Place Hotel Lansdowne Place Hove	Part demolition, change of use and alteration and extensions to convert hotel to 45 residential units.	45	2016/17
Whitehawk Clinic, Whitehawk Road	Demolition of Clinic and erection of 38 dwellings	38	2018/19
The Downsman 189 Hangleton Way Hove	Demolition of former public house and erection of 33 dwellings.	33	2018/19
76-79 And 80 Buckingham Road Brighton	Erection 20 dwelling units and conversion to provide 14 dwellings	32	2018/19
Former Site Of North District Housing Office Selsfield Drive Brighton	Erection of building comprising 30 residential dwellings	30	2018/19
251- 253 Preston Road Brighton	Conversion, extension and refurbishment to create of 22 apartments. Erection of 6 houses	28	2017/18
Baptist Tabernacle, Montpelier Place	Demolition of church and erection of 24 residential units	24	2017/18
The Coach House & 1-6 Lions Gardens Brighton	Demolition of existing dwellings and erection of building providing 26 apartments.	19	2018/19
51 - 53 Church Road Hove	Prior approval for change of use from offices to 12 residential units.	12	2018/19

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5. Residential Planning Permissions Granted

5.1. In 2018/19 there were 1,378 net units permitted (Chart 7) through 190 applications¹³ (including prior approval applications for the change of use to residential through permitted development). This is similar to the 1,487 net units permitted in the previous monitoring year and almost double the units permitted in 2016/17. The number of residential units permitted over the past two years has been significantly higher than in all earlier years since the start of the City Plan period in 2010.

Chart 7: Number of Residential Units Permitted 2010-2019



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5.2. There were 16 major residential developments¹⁴ permitted in 2018/19, which, when complete, will provide 1,123 net units (Table 6). Of these, 235 units were commenced in the monitoring year.

¹³ Discounts any multiple applications made on the same site

¹⁴ 10 or more units

Table 6: Major Developments, Permitted 2018/19

Address	Application Description	Net
Unit 1-3 Ellen Street Hove	Demolition of existing and erection of mixed use development with 186 residential apartments	186
Former Amex House Edward Street Brighton	Erection of a mixed use development with 168 residential dwellings	168
Crown House 21 Upper North Street Brighton	Prior approval for change of use from offices to residential to form 149 flats	149
Greater Brighton Metropolitan College Pelham Street Brighton	Outline Application Site B Demolition of existing buildings and erection of up to 135 residential units	135
Westerman Complex, School Road, Hove	Demolition of existing buildings and erection of 104 dwellings and office space	104
St Aubyns School 76 High Street Rottingdean	Redevelopment to provide a total of 93no new dwellings	90
Coombe Farm, Westfield Avenue North, Saltdean, Brighton	Outline application for Demolition of farm buildings and erection of 60 dwellings	60
Land South Of Ovingdean Road Brighton	Outline application for the construction of 45 dwellings	45
Whitehawk Clinic, Whitehawk Road	Demolition of Clinic and erection of 38 dwellings	38
76-79 And 80 Buckingham Road Brighton	Erection 20 dwelling units and conversion to provide 14 dwellings	32
Former Site Of North District Housing Office Selsfield Drive Brighton	Erection of building comprising 30 residential dwellings	30
65 Orchard Gardens Hove	Demolition of existing buildings and erection of mixed use development with 23 flats	23
Preston Park Hotel 216 Preston Road Brighton	Change of use of hotel to residential to provide 22 flats	22
The Coach House & 1-6 Lions Gardens	Demolition of existing dwellings and erection of building providing 26 apartments.	19
51 - 53 Church Road Hove	Prior approval for change of use from offices to 12 residential units.	12
Shermond House 58 - 59 Boundary Road Hove	Prior approval for change of use from offices to 10 residential units.	10

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6. Future Residential Provision

- 6.1. The 2019 SHLAA¹⁵ Update will update the housing trajectory for the city which illustrates the rate at which new residential development is anticipated to be delivered over the next 15 years. The 2019 SHLAA Update will also be used to update the city's five year housing land supply position and will be summarised in Section 5 of the 2019 SHLAA update.

7. Brownfield Land Register

- 7.1. In April 2017, The Government introduced a requirement for Local Planning Authorities to publish a Brownfield Land Register by 31 December 2017¹⁶. This provides publicly available information on previously developed (brownfield) sites within the city which offer potential for housing development. The first Brownfield Land Register was published in December 2017. The Register is reviewed on an annual basis and was last updated and published on the council website¹⁷ in December 2019. Details of how to make a submission for inclusion of a site are available on the Brownfield Land Register page of the council website **Error! Bookmark not defined.**

8. Student Accommodation, Halls of Residence and HMOs

- 8.1. Policy CP21 in City Plan Part One¹ 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). Five sites were allocated by the City Plan Part One for PBSA. Table 6 shows the progress towards delivery on each of the allocated sites.

Table 6: City Plan Part One Strategic Allocations for Purpose Built Student Housing

Location	Bedspaces	Progress 2018/19
Preston Barracks and the University of Brighton, Lewes Road	750	1,338 bedspaces permitted and commenced 2017/18
East Slope and land adjoining to the east, University of Sussex	592	Reserved Matters application for East Slope Phase One approved 2016/17 for 1,276 net bedspaces. Net increase of 444 bedspaces completed 2018/19 and 832 bedspaces under construction 2018/19. Further 249 bedspaces through separate application under construction 2018/19.
Circus Street, Brighton	400	450 bedspaces under construction 2018/19
Pelham Street, Brighton	300	Permission allocation derives from was unimplemented. College's aspirations for this site and funding sources have altered and application without student provision was approved 2018/19
Varley Halls, Coldean Lane, Brighton	150	Complete

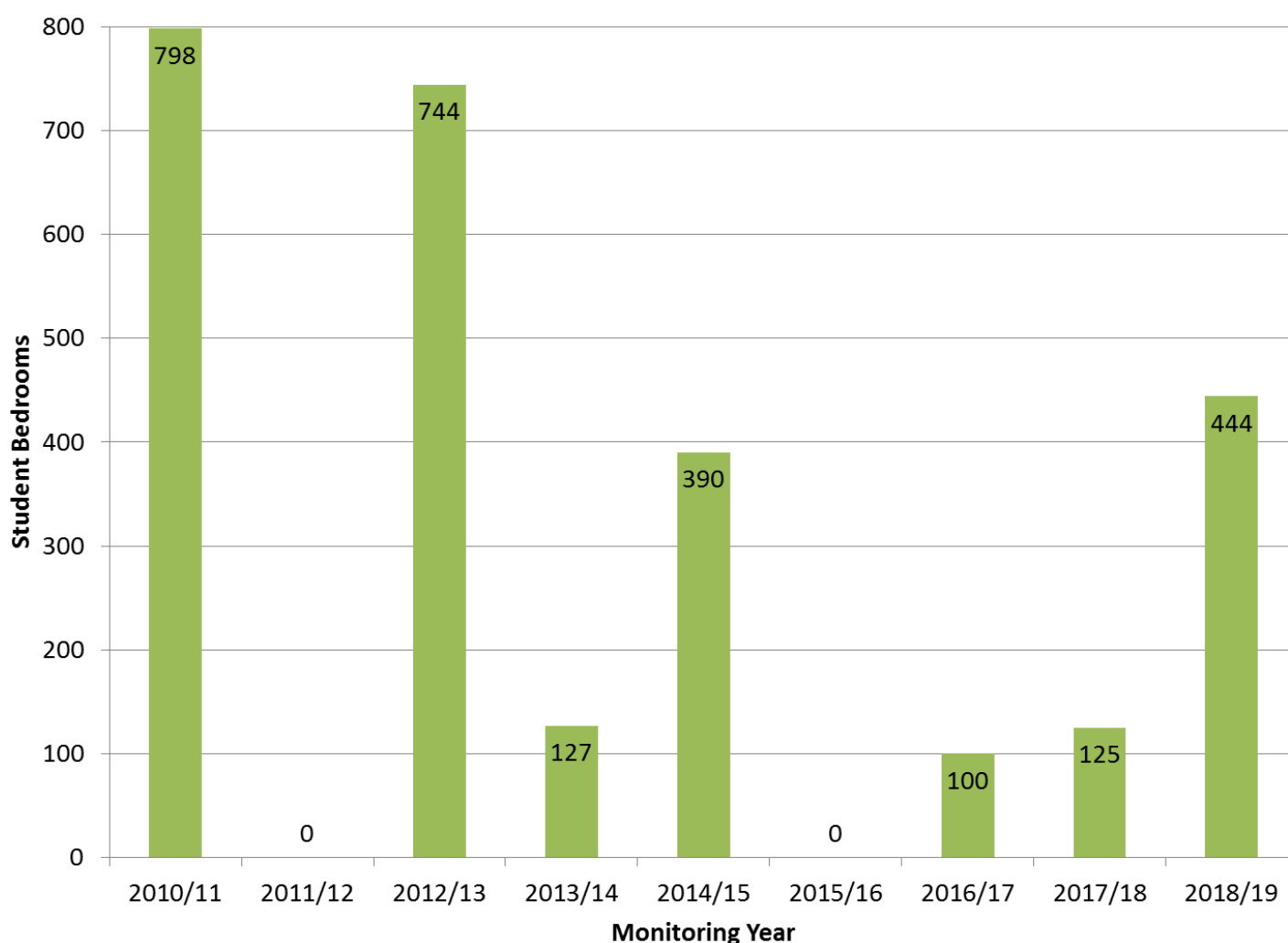
¹⁵ [Strategic Housing Land Availability Assessment Updates , Brighton & Hove City Council 2019](#)

¹⁶ [Brownfield registers and permission in principle \(MHCLG April 2017\)](#)

¹⁷ [Brighton & Hove City Council Brownfield Land Register \(December 2018\)](#)

8.2. There was a net increase of 444 bedrooms of PBSA completed in 2018/19. All of the student provision completed in 2018/19 came through the redevelopment of the East Slope on the University of Sussex campus. Overall 1,036 bedrooms were completed on the East Slope while 592 bedrooms of the original East Slope halls of residence were demolished. A further 1,081 student bedrooms were under construction on the East Slope in the monitoring year. All permitted student development, in the city, is currently under construction with 3,061 new student bedrooms under construction at the end of April 2019. Since 2010; there have been 2,728 additional student bedrooms created in PBSA (Chart 8). There were no PBSA developments approved in 2018/19.

Chart 8: Number of New Student Bedrooms Completed 2010-2019



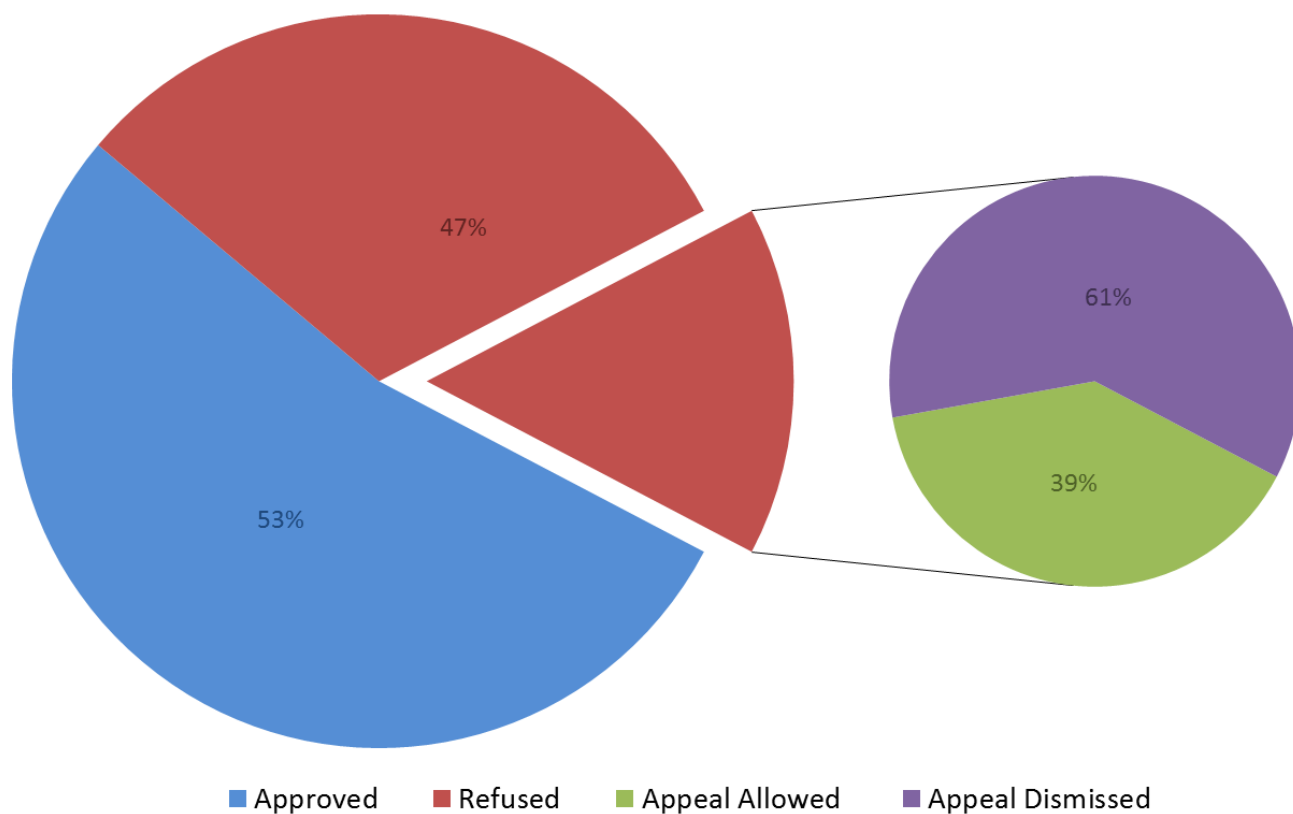
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8.3. There are a high number of HMOs, approximately 5,000 licensed, in the city. This is partly due to housing prices and the availability of housing within the city forcing groups such as young working professionals to seek affordable private rented housing and partly due to the supply of purpose built student accommodation not matching the expansion of the student population. 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 HMO¹⁸. 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. In response to concerns about increasing proliferation of HMOs elsewhere in the city, a citywide Article 4 Direction is due to come into force on 3 June 2020.

8.4. There have been 247 planning applications, 132 approved and 115 refused, made for the change of use of a single dwelling house to a small HMO in the wards with an Article 4 Direction between April 2013 and March 2019. Of those refused, 38 have been subject to an appeal, of which fifteen have been allowed (Chart 9). This suggests that over forty percent of applications, which would have previously been permitted development, were considered to have a potentially negative impact. In 2018/19 there were 56 HMO applications decided; 28 applications were approved and 28 were refused. Twelve of those refused were appealed, of which seven were allowed. The number of applications for HMOs in the wards subject to the Article 4 Direction has increased from 40 in 2016/17 to 61 and 56 in 2017/18 and 2018/19 respectively. The percentage of refusals being appealed has also increased in that time.

Chart 9: Decisions on HMO applications in Article 4 Wards 2013-2019



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¹⁸ Properties lived in by three to six people where facilities such as a kitchen or bathroom are shared

9. Gypsy and Traveller Provision

- 9.1. Policy CP22 ‘Traveller Accommodation’ in City Plan Part One¹ sets out the council’s approach to providing traveller accommodation based on assessments of local need.
- 9.2. An updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) was published in 2019¹⁹. The Assessment covers the administrative area of Brighton & Hove including that part located within the South Downs National Park Authority area. This approach reflects City Plan Policy CP22 which includes provision for an updated target to be identified through a revised assessment of traveller accommodation needs, and further states that the Council will review traveller accommodation needs to cover the full plan period to 2030. The revised assessment of need is set out below:

Table 7: Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition by year periods

Area	Year			Total
	0-5 2019-24	6-10 2024-29	11-15 2029-34	
Brighton & Hove LPA area	0	0	0	0
SDNP LPA area within Brighton & Hove	6	2	3	11

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- 9.3. The allocation of the identified pitch requirements for travellers who meet the planning definition to the SDNP LPA area stems largely from the geographical location of the Horsdean site (within the National Park) which is within the Brighton & Hove administrative area. As a result both LPAs will continue to work constructively and jointly to address the need for new permanent pitches that has been identified in the updated GTAA.
- 9.4. A joint site search exercise undertaken by BHCC and the SDNPA in 2016/17 did not identify any suitable and available sites. A Duty to Cooperate process has therefore been undertaken with neighbouring authorities to ascertain whether and to what extent they were able to provide additional pitches to assist in meeting any of the unmet need. No neighbouring authorities have currently indicated any ability to assist in meeting the unmet need.



¹⁹ [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment : BHCC and the SDNPA December 2014](#)



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