

# **Brighton & Hove City Council**

## **Authority Monitoring Report 2021/22**

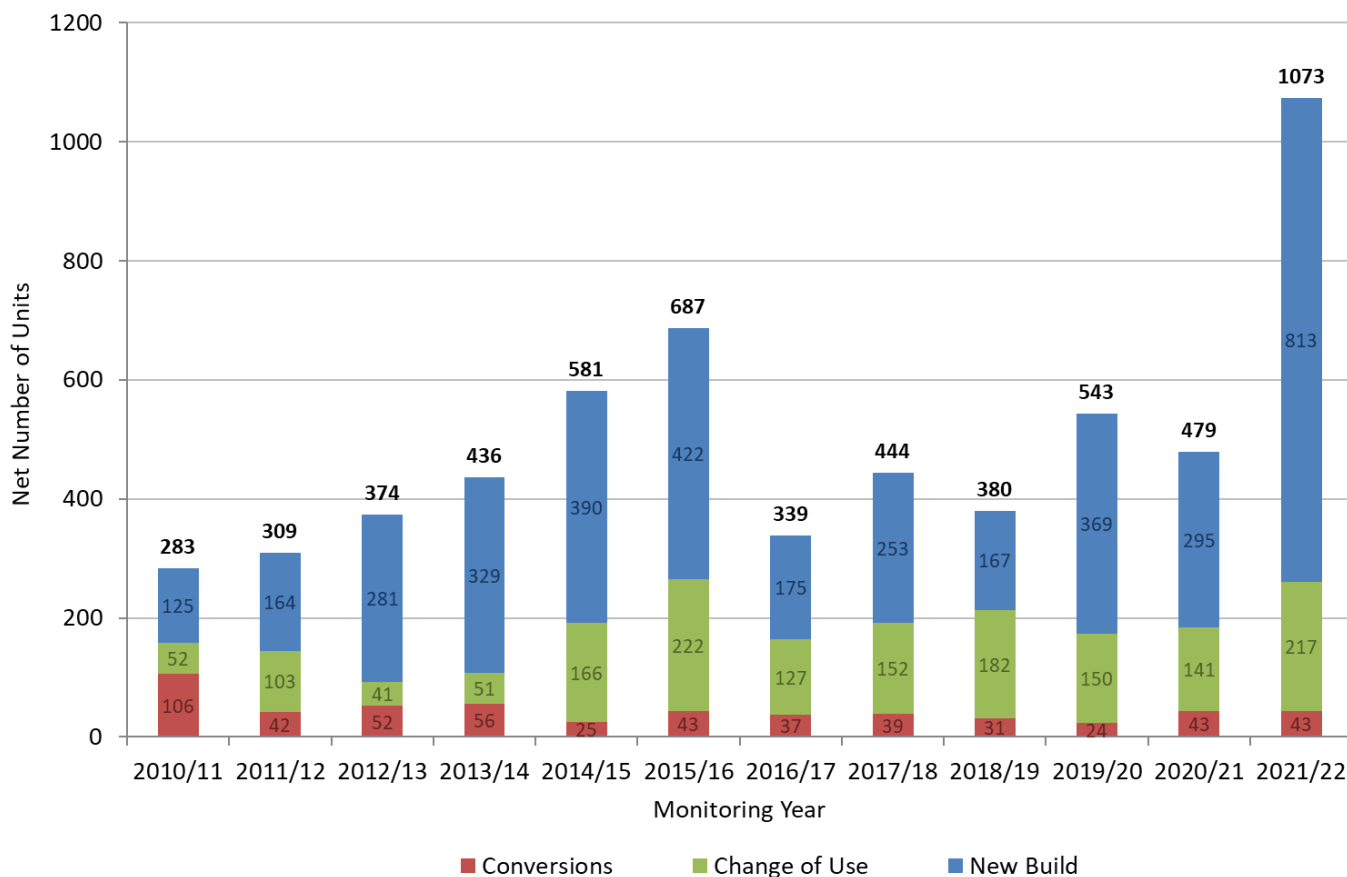
### **Residential Development**

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## 1. Residential Completions

**Chart 1: Net Completions by Development Type 2010/11 - 2021/22**



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There were 1073 net housing completions in 2021/22. This is a substantially higher completion figure than any previous year over the City Plan period to date (since 2010) and comfortably exceeds the annualised housing requirement of 660 dwellings per year. However, due to the under-provision in previous years, the implied annual delivery rate required to meet the Plan target remains high at 909 dwellings per year (Table 1).

**Table 1: City Plan Housing Requirement**

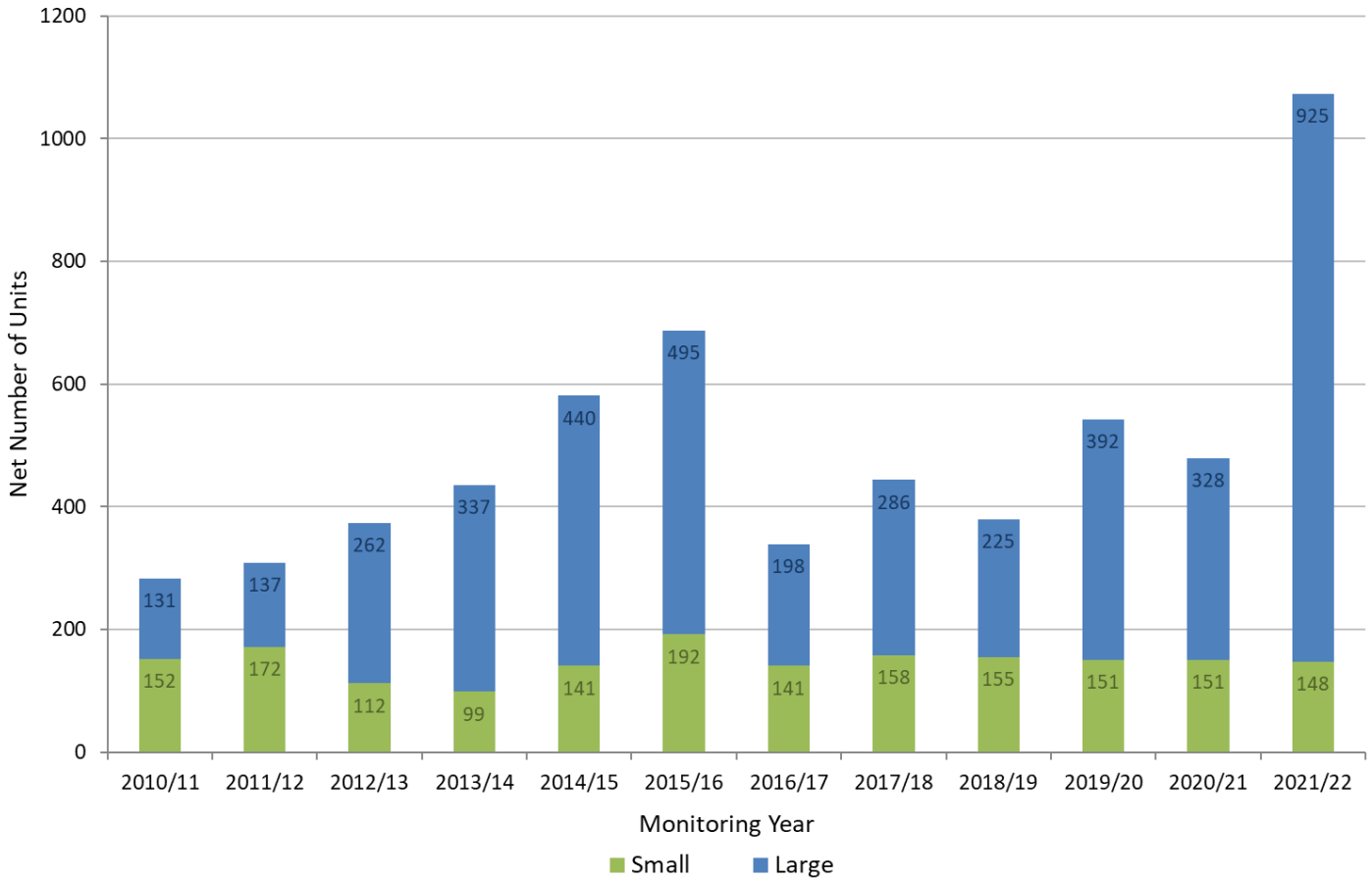
	Plan Requirement	Implied Annual Rate
<b>Plan Period 2010-2030</b>	13,200	660
<b>Remaining Period 2022-2030</b>	7,272 <sup>1</sup>	909

**BHCC 2022**

The highest proportion of housing delivery in 2021/22 was completed through new build developments, which provided a total of 813 net dwellings. This is a significant improvement on previous monitoring years.

<sup>1</sup> Takes into account recorded net completions from 2010-2022 (5,928 units)

**Chart 2: Net Completions by Development Size 2010/11 - 2021/22**



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There has been a substantial increase in residential completions on large<sup>2</sup> developments which are at the highest level of the Plan period (Chart 2), with completions in small<sup>3</sup> developments remaining at a similar level to previous years. Of the 925 units completed on large sites, 376 were within Development Areas, as defined in the City Plan Part One (Policies DA1-DA8); these include developments within DA3 at Preston Barracks, DA4 at 25-28 Elder Place and within DA5 at the former Amex House on Edward Street. The residential completions on sites of 10 or more dwellings are summarised in Table 2, these sites delivered a total of 887 units.

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

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

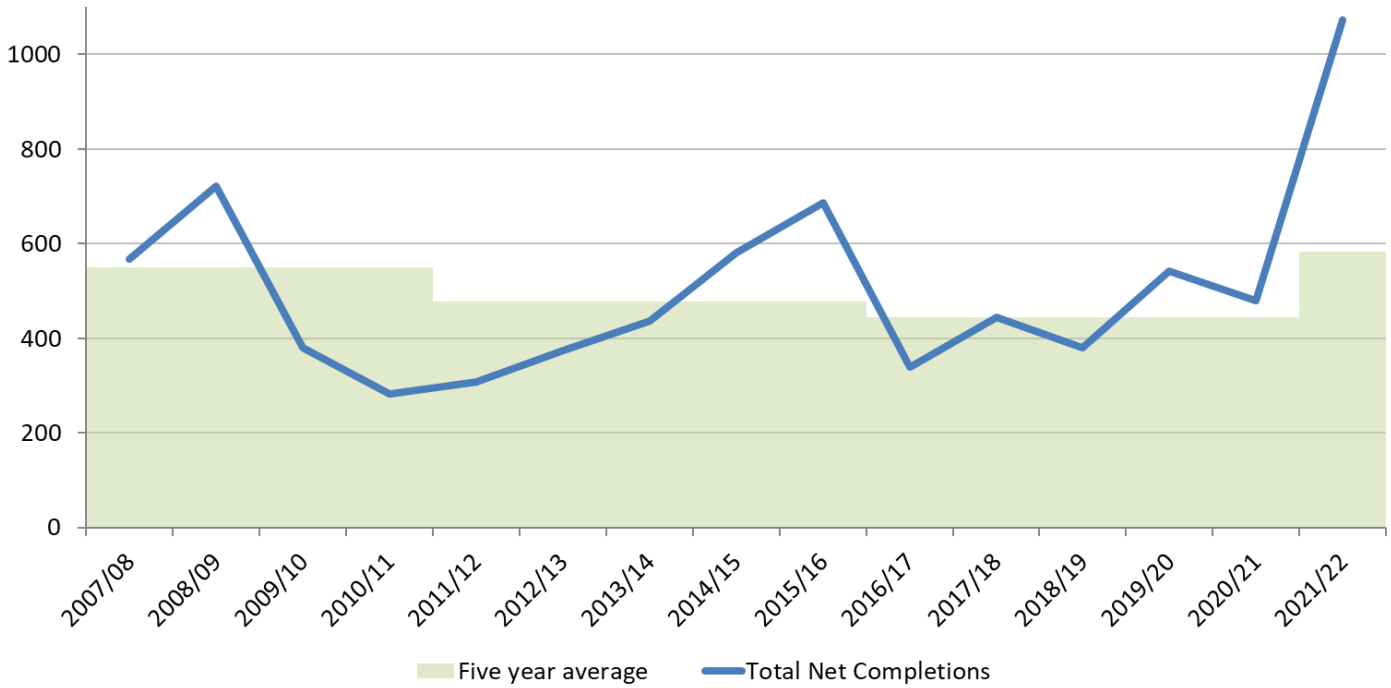
**Table 2: Major Developments Completed 2021/22**

<b>Address</b>	<b>Development</b>	<b>Net Units Completed</b>
Preston Barracks, Lewes Road, Brighton	201 units complete of 369 dwellings proposed.	201
Kings House, Grand Avenue, Hove	Conversion of existing office building to provide 69 units, erection of a ten-storey building to provide 72 units and erection of six-storey building to provide 28 units.	169
Former Amex House, Edward Street, Brighton	Mixed-use development including 168 residential units.	168
Westerman Complex, School Road, Hove,	Demolition of existing buildings and erection of mixed-use development including 104 dwellings.	104
Land Off Overdown Rise and Mile Oak Road, Portslade	Remaining 86 units constructed of 125 dwellings proposed.	86
Site Of Sackville Hotel, 189 Kingsway, Hove	Erection of five to eight-storey building to provide 52 residential units (amended from 60 dwellings).	52
Rayford House, School Road, Hove	Prior approval for change of use from offices to residential to form 44 flats.	44
St Aubyns School, 76 High Street, Rottingdean	33 units constructed of 93 dwellings proposed.	33
George Cooper House, 20-22 Oxford Street, Brighton	Change of use from offices to residential to form 10 flats.	10
Shermond House, 58 - 59 Boundary Road, Hove	Prior approval for change of use from offices to residential to form 10 flats.	10
35 Upper Rock Gardens, Brighton	Certificate of lawfulness for existing use as 10 flats.	10

**BHCC 2022**

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 (from 2007/08) and since the start of the City Plan period (2010/11) has been 506 and 494 units per year respectively. Annual completions then increased each year between 2010/11 until 2015/16. In 2016/17 the number of completions dipped again and remained below the required City Plan delivery rate of 660 units per year, until the 2021/22 monitoring year which has significantly surpassed the annual requirement.

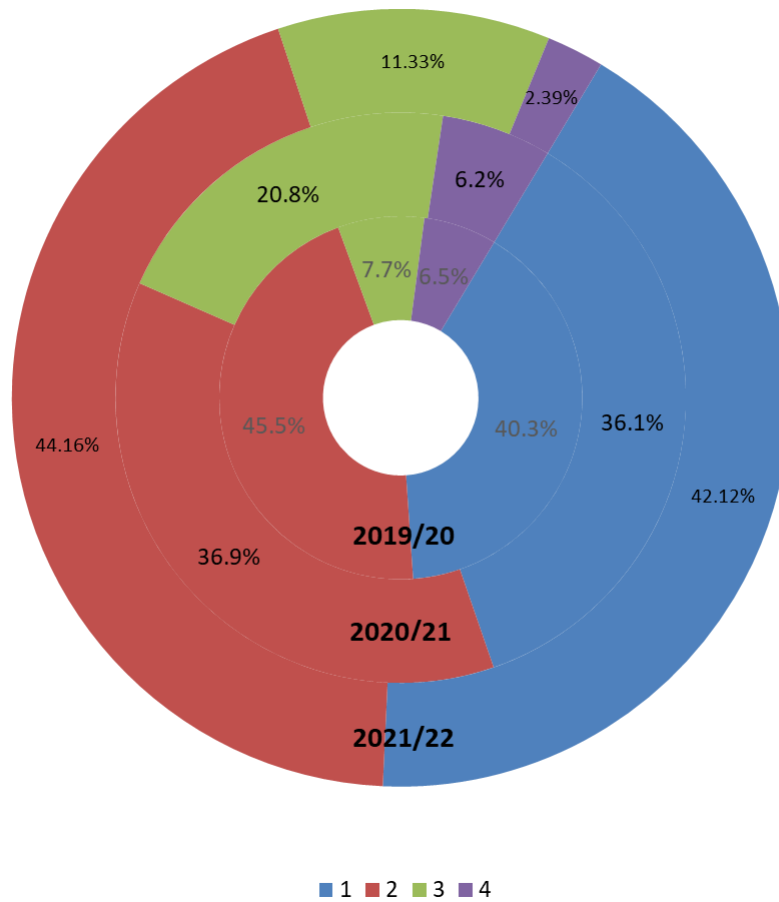
**Chart 3: Total Residential Completions in Brighton & Hove 2007/08 – 2021/22**



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In 2021/22 flats comprised 84 percent of new residential completions; 80 percent of which were two bed flats or smaller. Of the 16 percent completed as houses, 63 percent were three bed houses or larger. Overall, one and two bed units comprised 86 percent of the residential units completed in 2021/22. This is a higher percentage than in the previous two monitoring years (Chart 4).

**Chart 4: Proportion of Gross Number of Units per Unit Size 2019/20 - 2021/22**

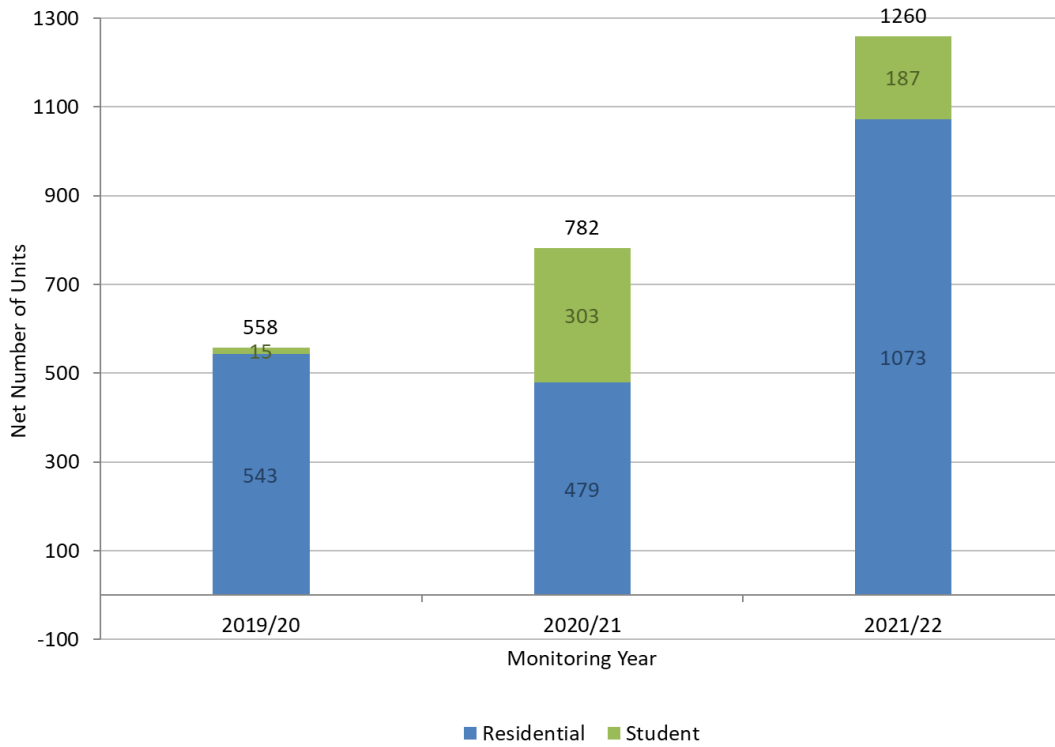


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For the purposes of Government housing completions data<sup>4</sup>, self-contained student accommodation has been included as part of the self-contained housing stock recorded in the housing supply data returns since 2018/19. With the inclusion of self-contained student accommodation, the total figure for self-contained residential accommodation increases to 1,260 units (Chart 5).

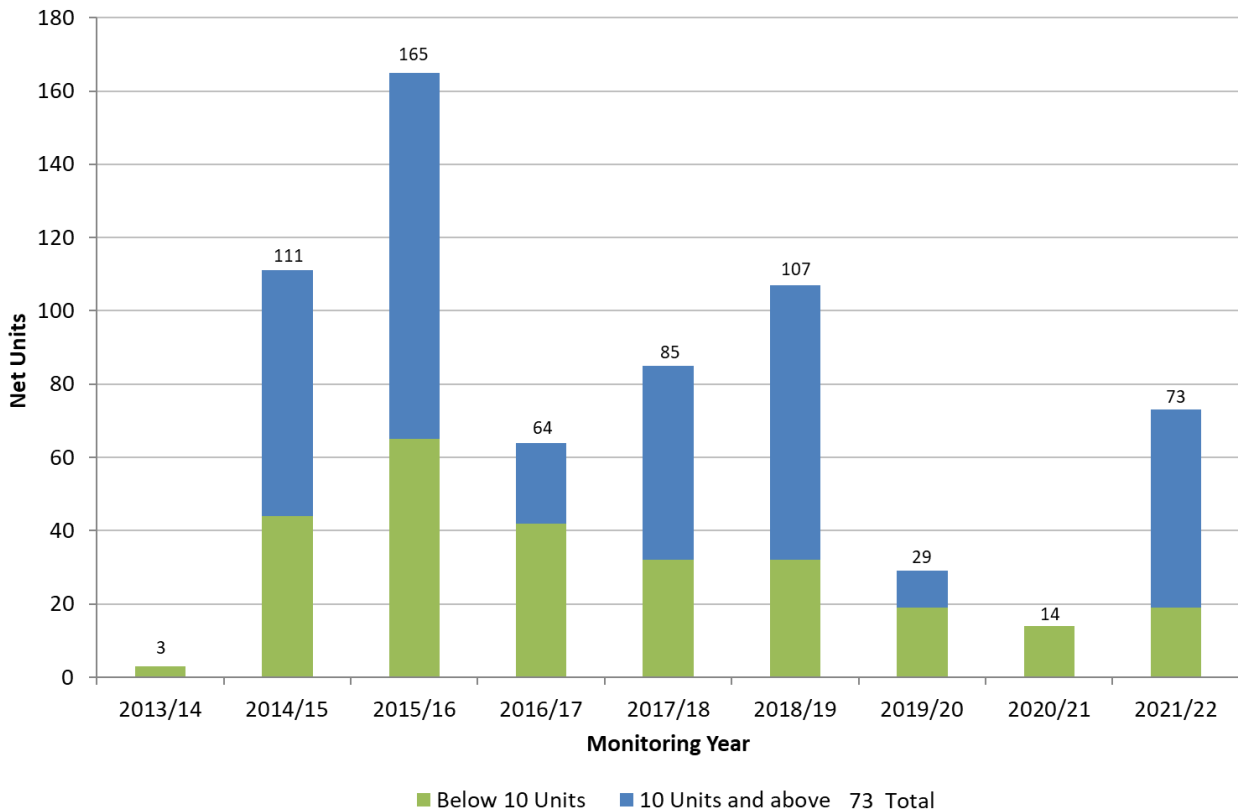
<sup>4</sup> Annual Housing Flows Reconciliations submitted by the council to central Government for monitoring housing completions and the Housing Delivery Test.

**Chart 5: Total Net Residential and Self-Contained Student Accommodation 2019/20 - 2021/22**



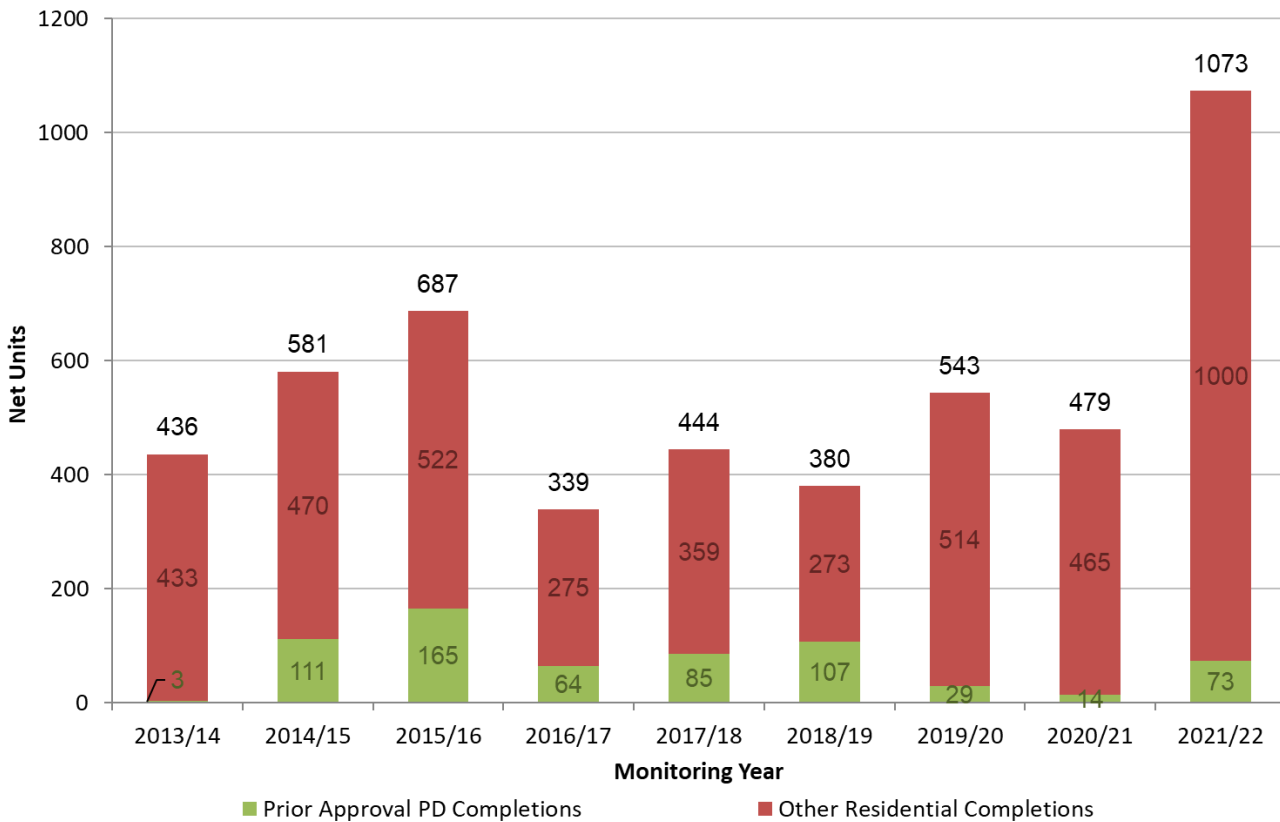
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**Chart 6: Total Net Prior Approval Completions by Size 2013/14 - 2021/22**



The permitted development right (PDR) 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 PDR 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 PDR.

**Chart 7: Prior Approval PD completions as a proportion of total net residential completions 2013/14 - 2021/22**



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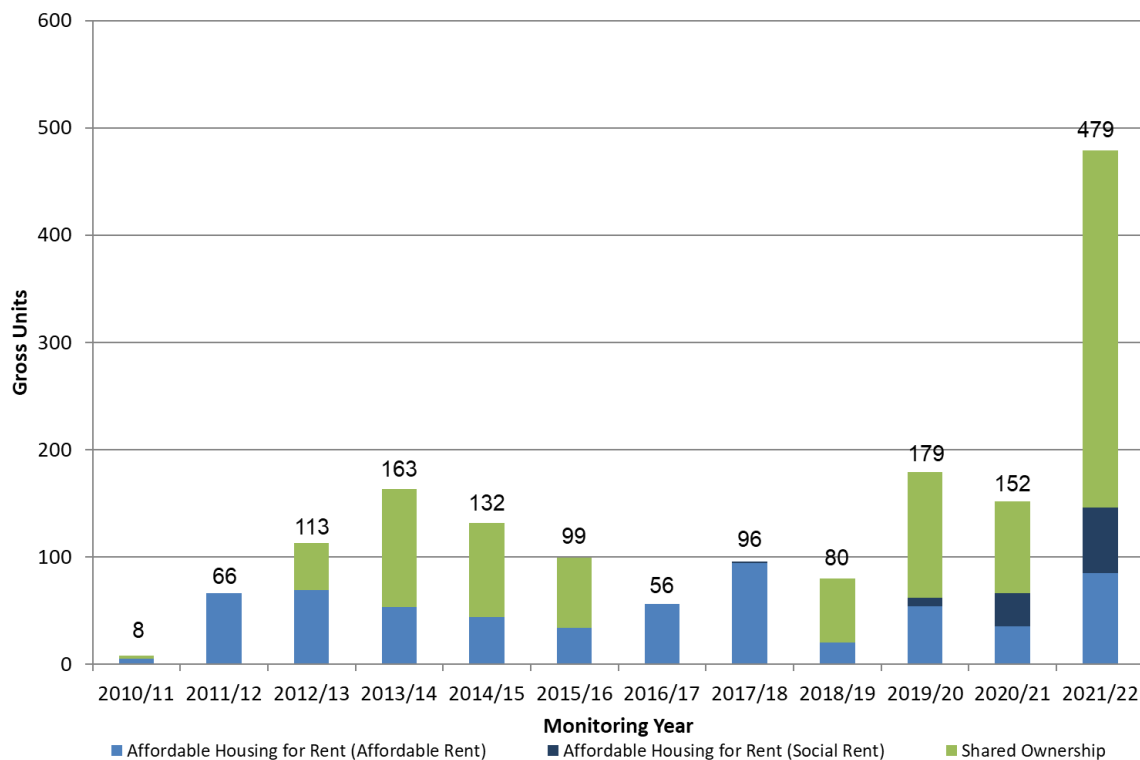
There were 73 residential units completed through permitted development in 2021/22 (Chart 6). 64 of these were the result of a change of use from office floorspace. Although these rights have increased residential delivery since 2013/14, the council has limited controls to ensure that the residential 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 reduces the supply of office space in the city.



## 2. Affordable Residential

Housing affordability is a major issue within the city as house prices in Brighton & Hove are high relative to 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>5</sup>.

**Chart 8: Total Gross Affordable Completions by Tenure 2010/11 – 2021/22**



**BHCC 2022**

A total of 479 affordable homes were completed in 2021/22 (Chart 8), this comprises 45 percent of all gross completions, significantly high than any other year since the start of the Plan period. 478 affordable units were delivered through major developments which represents 54 percent of all units within major developments. Of the eight completed major developments with affordable housing, two were 100 percent affordable<sup>6</sup>. There were no off-site affordable financial contributions in lieu, as all affordable housing units were delivered on-site. 35 percent of the affordable units were one-bed units, 46 percent were two-bed and 17 percent were three-bed.

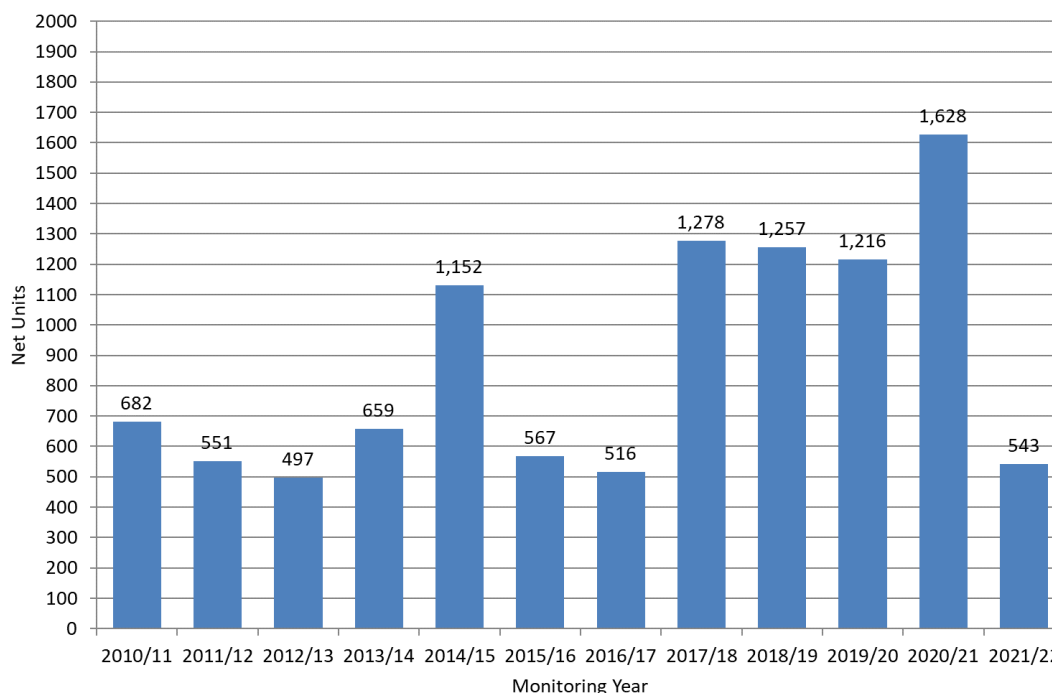
<sup>5</sup> [National Planning Policy Framework, Annex 2: Glossary, Affordable Housing, Page 64; DLUHC July 2021](#)

<sup>6</sup> Westerman Complex, School Road and Land off Overdown Drive.

### 3. Extant Permissions

There were 4,255 net housing units with extant permissions<sup>7</sup> at the end of March 2022; of which 3,197 units are in schemes that have commenced<sup>8</sup>. There were 1,080 net affordable housing units with extant permissions at the end of March 2022; with 758 units in schemes which have commenced. There were 543 new net housing units permitted<sup>9</sup> in 2021/22 (Chart 9); 35 of which were affordable housing units.

**Chart 9: Number of New Residential Units Permitted<sup>9</sup> 2010/11 - 2021/22**



**BHCC 2022**

### 4. Purpose Built Student Accommodation

City Plan Part One Policy CP21 encourages the provision of purpose-built student accommodation (PBSA) to help meet the housing needs of the city’s students and reduce the demand from students for alternative accommodation in the private rented sector, including Houses in Multiple Occupation (HMOs).

There were 1,487 net bedrooms completed in PBSA in 2021/22 (Chart 10) distributed in 187 cluster units<sup>10</sup> and 187 single-occupancy self-contained flats within PBSA (Chart 11). The completed bedrooms are a result of the completions of student accommodation at 41-42 Park Wall Farm Cottages in Falmer, 118-132 London Road, Preston Barracks and 1 Moulsecomb

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

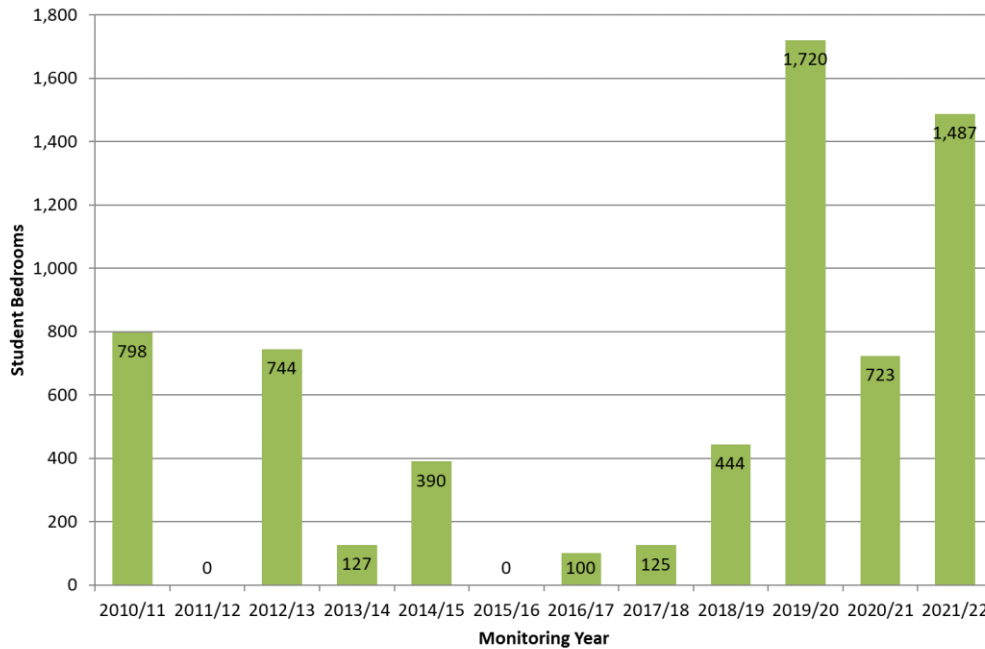
<sup>8</sup> Some sites are technical commencements or have remained commenced for an extended period of time, which, although are able to be implemented are likely not to continue to come forward on the current permission.

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

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

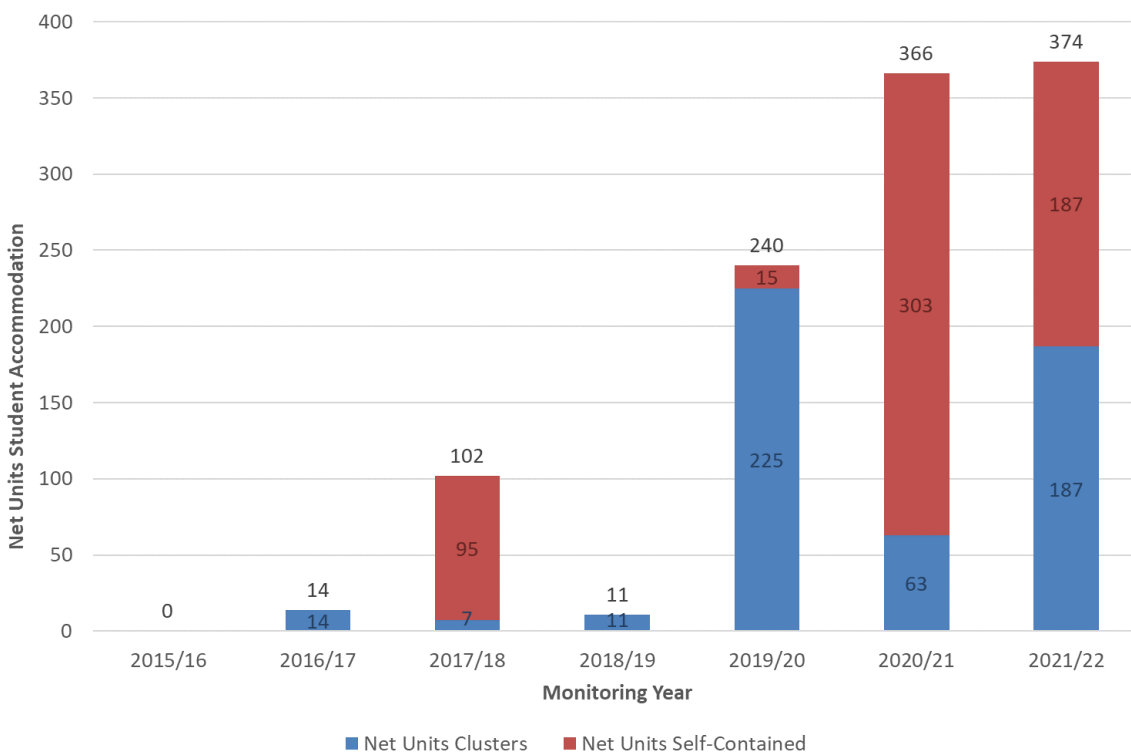
Way. Since 2010/11; 6,658 new bedrooms have been developed within Brighton and Hove. A further 2,223 bedrooms were under construction at the end of 2021/22.

**Chart 10: Number of Net Student Bedrooms Completed 2010/11 - 2021/22**



**BHCC 2022**

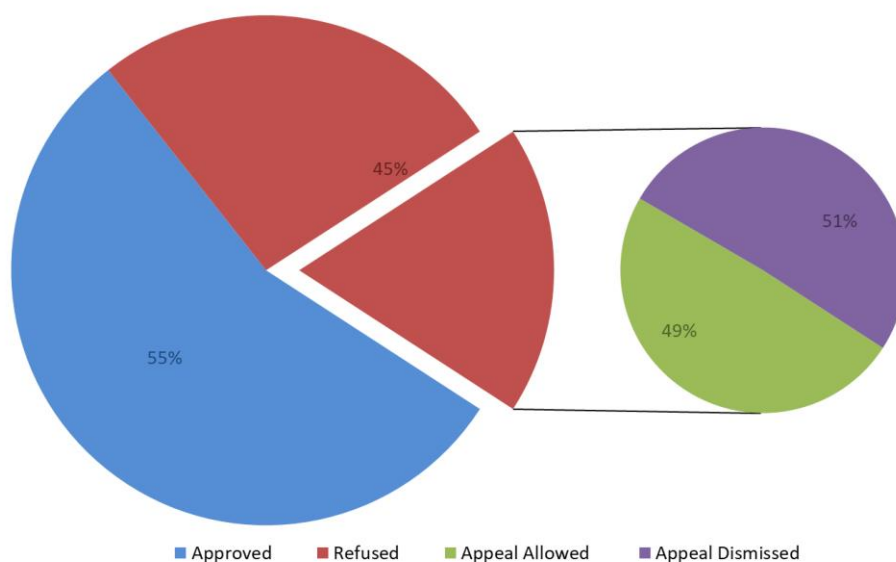
**Chart 11: Number of Net Student Units Completed 2015/16 - 2021/22**



## 5. Houses of Multiple Occupation

There are approximately 3,600 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 (use class C4) came into force in five electoral wards within Brighton and Hove which overrides national permitted development rights and requires a planning application to be submitted for such changes of use.. The Article 4 Direction was expanded to cover the whole city in June 2020. This enables the impact of concentrations of HMOs in certain areas of the city to be considered by the council using the criteria in City Plan Part One Policy CP21 and City Plan Part Two Policy DM7 when assessing proposals for new HMOs.

**Chart 12: Decisions on HMO applications in initial five Article 4 Wards 2013/14 - 2021/22**



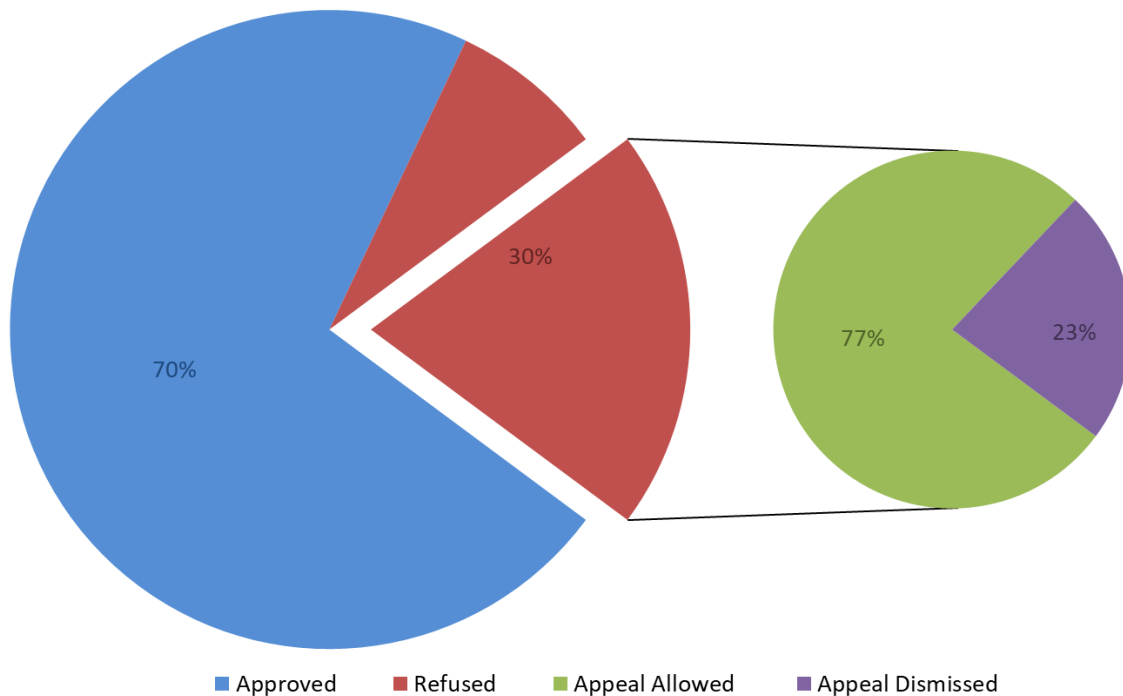
**BHCC 2022**

There have been 355 planning applications, for the change of use of a single dwelling house to a small HMO between April 2013 and March 2022 in the five wards where an Article 4 Direction took effect in April 2013 (Chart 12). Of these, 196 were approved and 159 refused. Of those refused, 65 have been subject to an appeal, of which 32 appeals have been allowed.

<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 13: Decisions on HMO applications from City-Wide Article 4 from June 2020 to March 2022**



**BHCC 2022**

Between the implementation of the citywide Article 4 Direction, on 3 June 2020, and the 31 March 2022 there have been 64 planning applications, 46 approved and 18 refused, for the change of use of a single dwelling house to a small HMO (Chart 13). Of those refused, 13 have been subject to an appeal, of which ten have been allowed.

**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.

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