

Brighton & Hove City Council

Authority Monitoring Report 2023/24

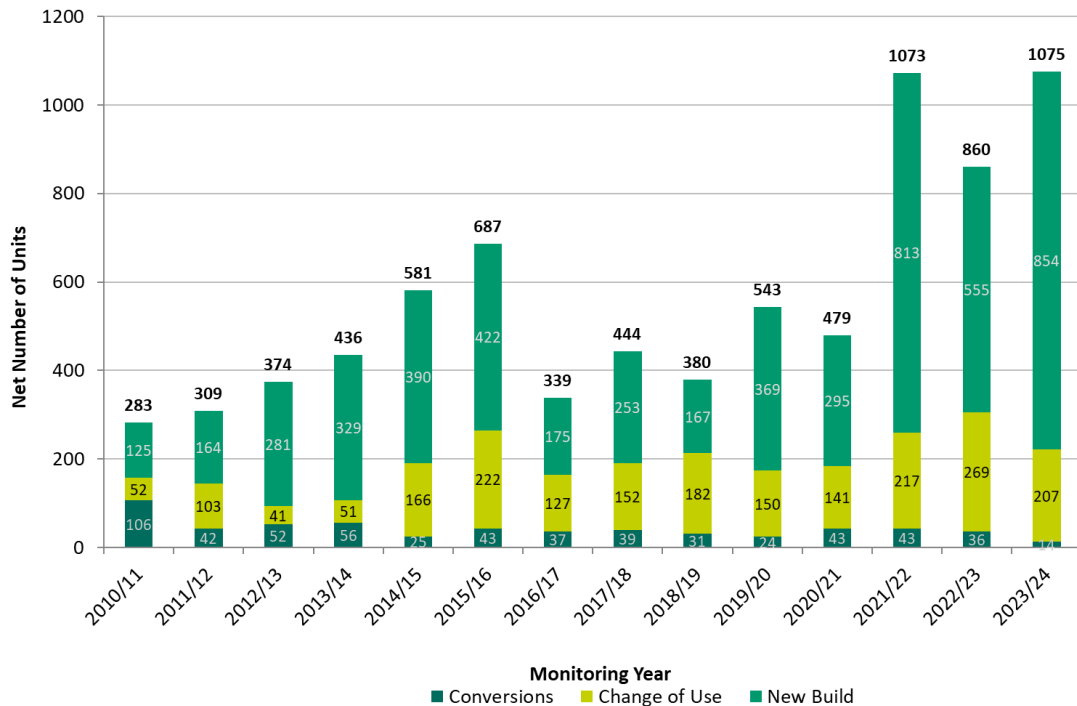
Residential Development

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1. Residential Completions

Figure 1: Net Completions by Development Type 2010/11 - 2023/24



Key findings:

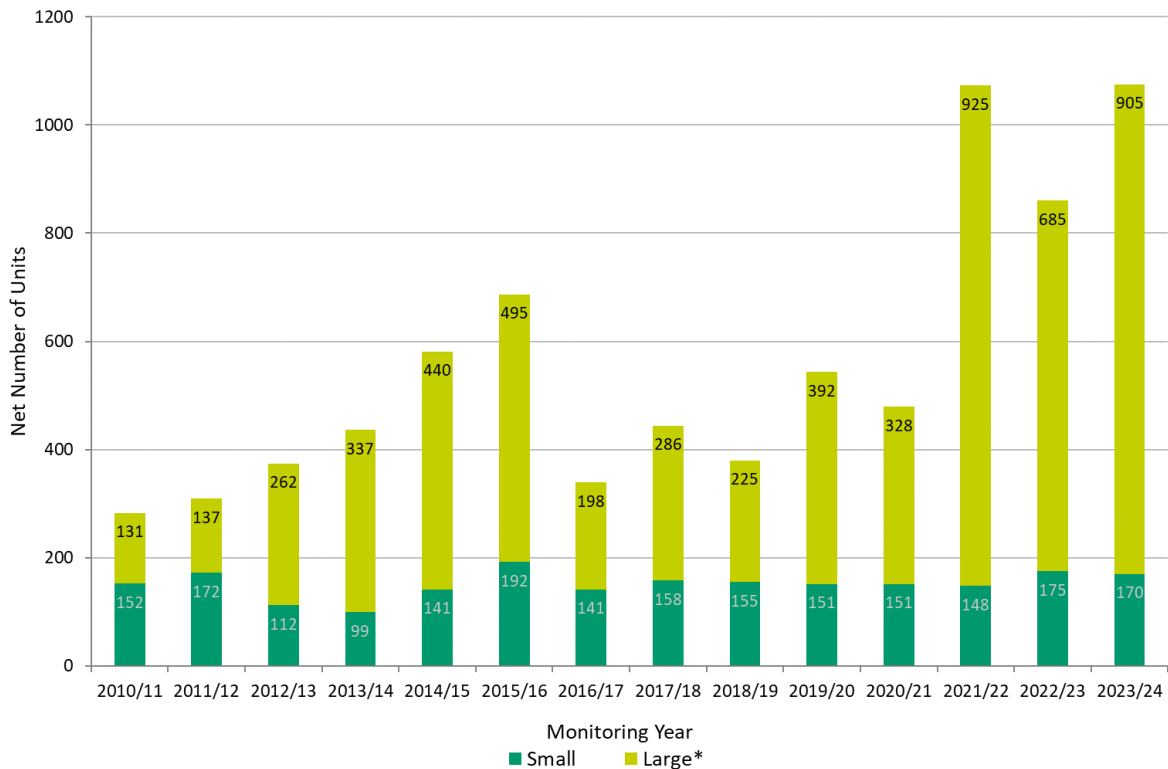
- The 1075 net housing completions in 2023/24 is the highest completion figure in the current plan period of 2010-2030 and comfortably exceeds the annualised housing requirement of 660 dwellings per year.
- Due to the under-provision in previous years, the implied annual delivery rate required over the remainder of the plan period to 2030 to meet the overall Plan target of 13,200 homes remains high at 890 dwellings per year (Table 1).
- New build developments accounted for the largest share of housing delivery in 2023/24, yielding a total of 854 net dwellings.

Table 1: City Plan Housing Requirement

	Plan Requirement	Implied Annual Rate
Plan Period 2010-2030	13,200	660
Remaining Period 2024-2030	5,337 ¹	890

¹ Takes into account recorded net completions from 2010-2024 (7,863 units)

Figure 2: Net Completions by Development Size 2010/11 - 2023/24



Key findings:

- Residential completions on large developments of 6 or more units in 2023/24 was the second highest total in the Plan period (Figure 2).
- Out of the 905 units completed on large sites, 351 were located within Development Areas (DAs) as defined in City Plan Part One (Policies DA1-DA8) resulting from the ‘Hove Gardens’ development at Unit 1-3 Ellen Street within DA6 Hove Station Area and ‘The Blockhouse’ development at Pelham Street within DA4 New England Quarter.
- 467 units were completed within site allocations as identified in the City Plan, including 242 affordable housing units on the Bluebell Heights development on the ‘Land to the East of Coldean Lane’ site.

A full list of residential development completions of 10 or more dwellings is set out in Table 2, with these sites yielding a total of 876 net units.

Table 2: Major Developments Completed 2023/24

Address	Development	Net Units Completed
Land to the East of Coldean Lane, North of Varley Halls, South of the A27	Erection of two 7-storey buildings and four 6-storey buildings to provide 242 residential units (H2 site allocation)	242
Unit 1-3 Ellen Street, Hove	Demolition of existing buildings and redevelopment to provide mixed use scheme including 216 residential units	216
Greater Brighton Metropolitan College, Pelham Street, Brighton	Mixed use redevelopment of Greater Brighton Metropolitan College site including the provision of 135 residential units	135
Palmer & Harvey House, 106-112 Davigdor Road, Hove	Prior Approval for change of use from offices to 92 residential units (SSA3 site allocation)	92
113-119 Davigdor Road, Hove	Mixed use development including 52 residential units (SSA3 site allocation)	52
St Aubyn's School, 76 High Street, Rottingdean	Remaining 48 residential dwellings on Former St Aubyn's School site delivered (H1 site allocation)	48
239-243 Kingsway, Hove	Demolition of existing buildings and erection of 8-storey building to provide 34 residential flats	34
Land South of Ovingdean Road, Brighton	Remaining 33 residential dwellings on Land adjacent Ovingdean and Falmer Road site delivered (H2 site allocation)	33
Montpelier House, 99 Montpelier Road, Brighton	Prior Approval for change of use from offices to 12 residential flats	12
51-53 West Street, Brighton	Prior Approval for change of use from offices to 12 residential flats	12

Figure 3: Annual Net Residential Completions in Brighton and Hove Compared to Five-Year Average Annual Completions 2010/11 - 2023/24

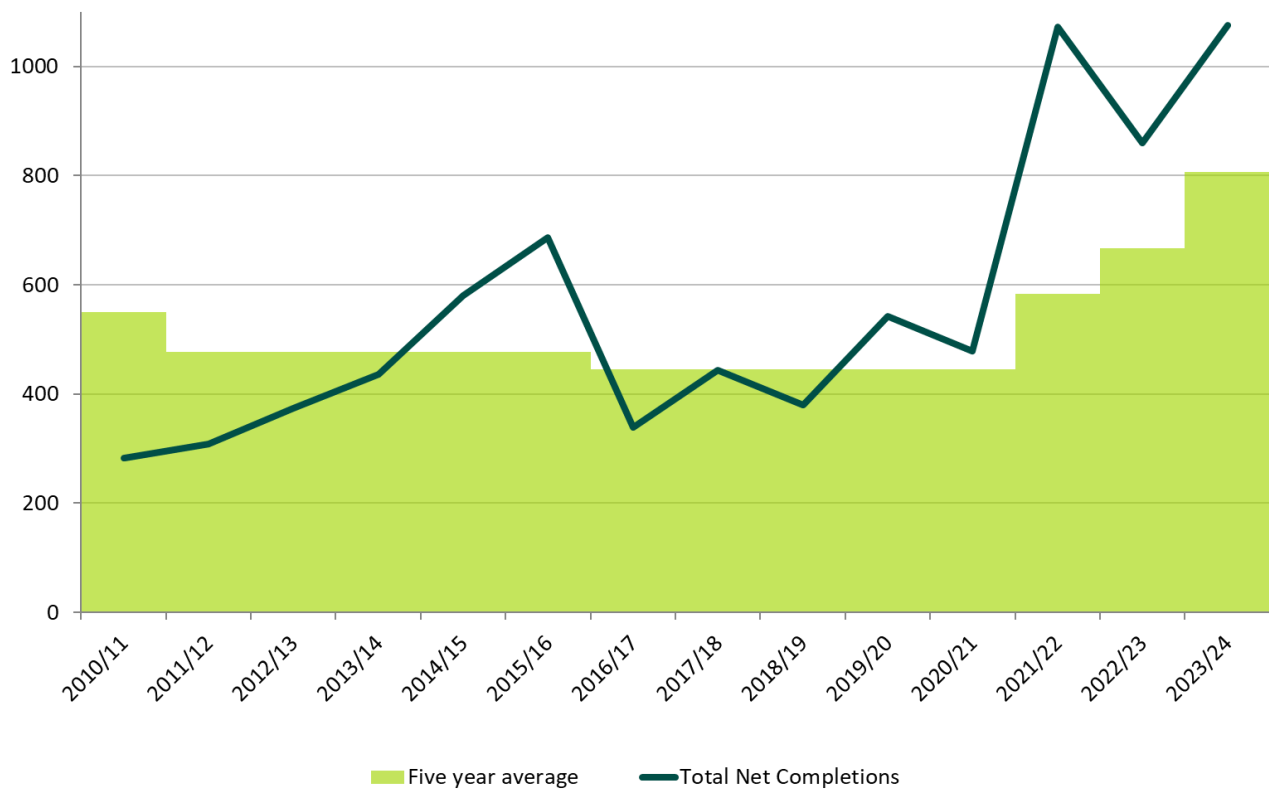
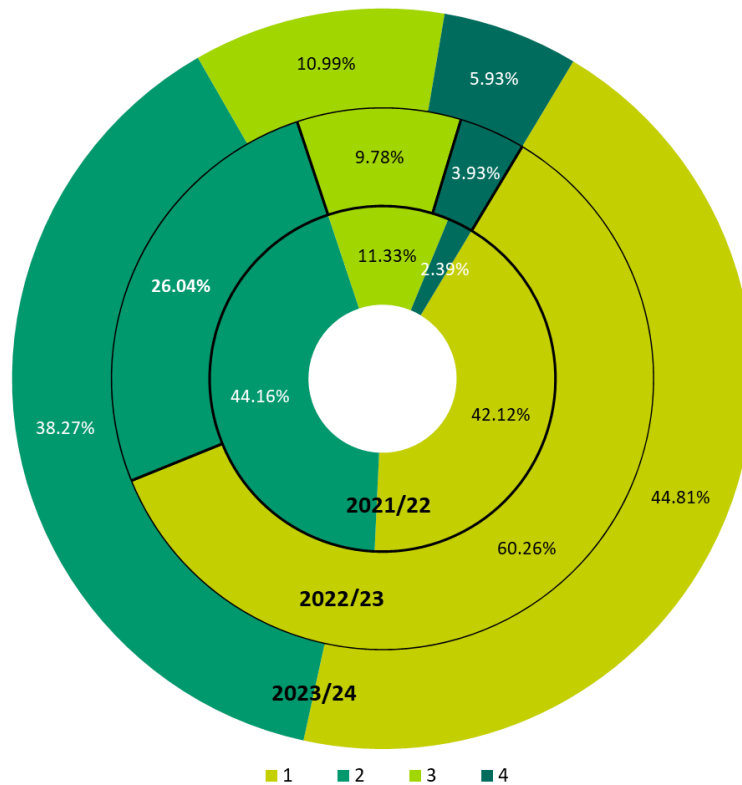


Figure 3 illustrates the net annual residential completions in the city since the start of the Plan period (2010/11).

Key findings:

- The average rate of residential completions over this period has been 562 units per annum, less than the plan requirement at adoption of 660.
- Completions have increased significantly since the 2021/22 monitoring year, exceeding the annual requirement.

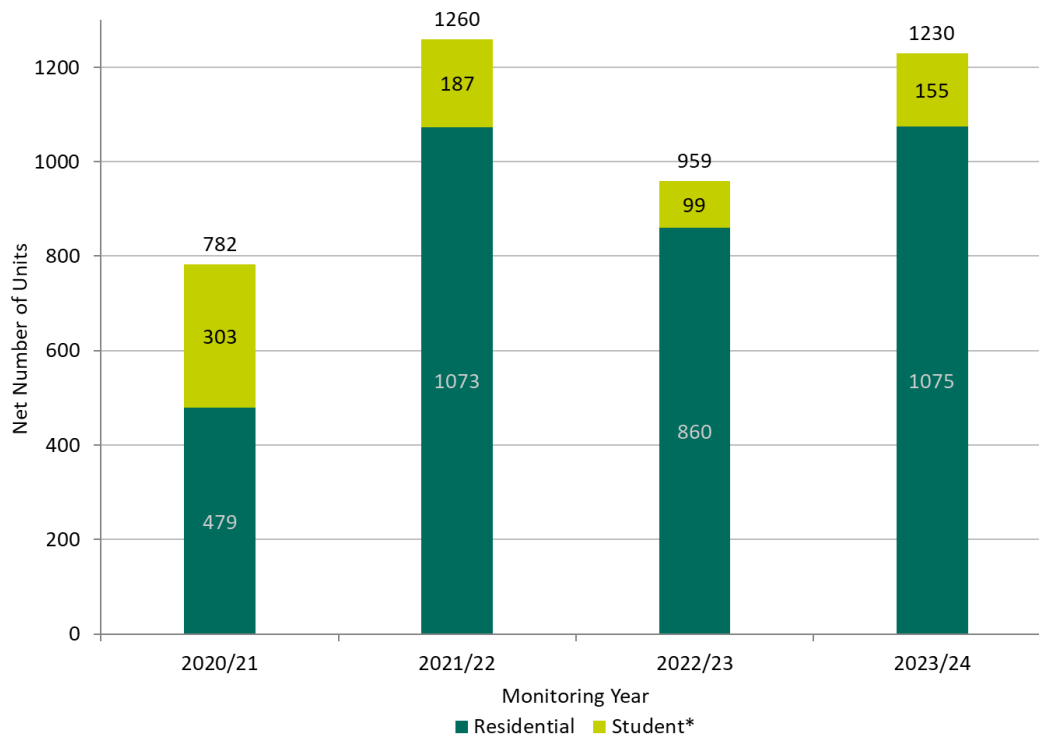
Figure 4: Proportion of Gross Number of Units per Unit Size 2021/22 - 2023/24



In 2023/24, flats comprised 88% of newly completed residential units, with 81% of these flats featuring two bedrooms or fewer. The remaining 12% of newly completed residential units were houses, 75% of which were three-bedroom houses or larger.

Whilst one and two-bedroom units remain the largest proportion of all residential units completed in 2023/24 (83% of all units), their proportion of three and four-bedroom units completed is greater than in previous monitoring years (17% of all units) as shown in Figure 4.

*Figure 5: Total Net Residential and Self-Contained Student Accommodation
2020/21 -2023/24*



For Government housing completion data², 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 1230 units (Figure 5).

A 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. Following changes to the Use Class Order, a new PDR for the change of Commercial, Business and Service use (E use class) to residential use, came into force in August 2021.

Key finding:

- In 2023/24, 157 residential units were completed through permitted development (Figure 6), representing 15% of total completions.

² Annual Housing Flows Reconciliations submitted by the council to central Government for monitoring housing completions and the Housing Delivery Test.

Figure 6: Total Net Prior Approval Completions by Size 2013/14 – 2023/24

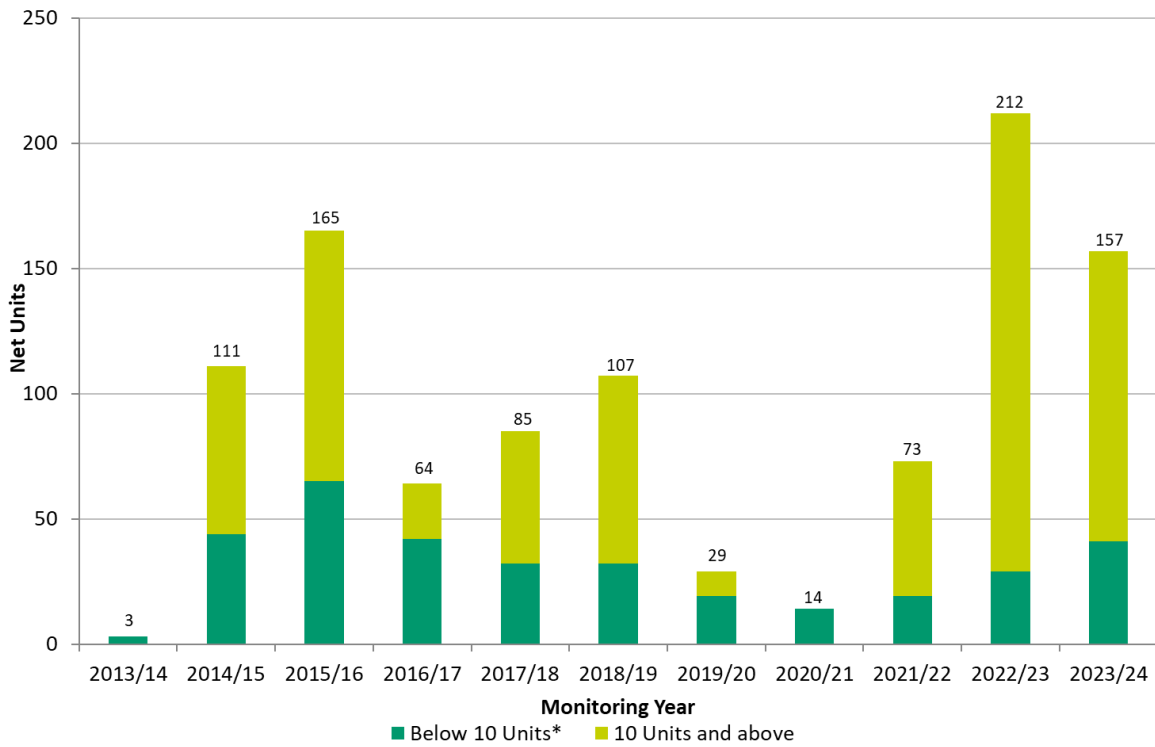
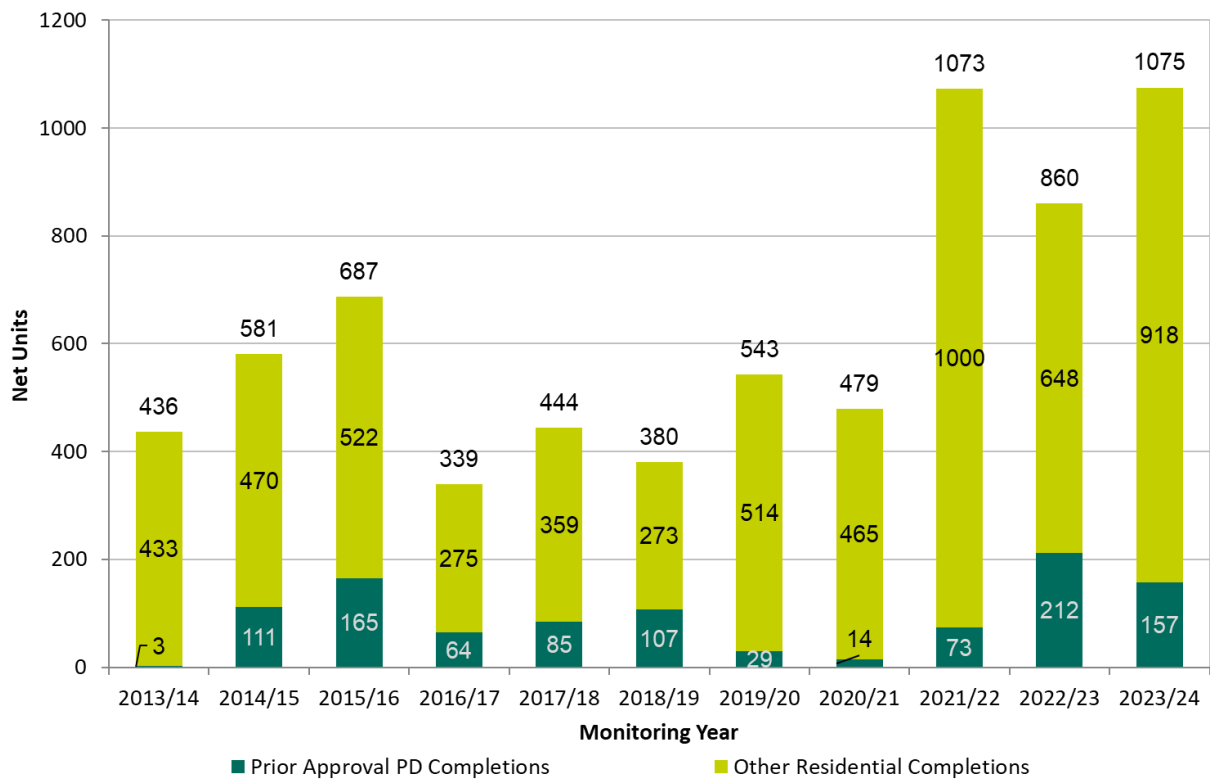


Figure 7: Prior Approval PD completions as a proportion of total net residential completions 2013/14 - 2023/24



2. Affordable Residential

Housing affordability remains a severe challenge in Brighton & Hove, as house prices have risen, substantially outpacing income levels. To address this issue, Policy CP20 of City Plan Part One requires the inclusion of affordable housing (or an equivalent financial contribution) in all new developments comprising five or more net 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 ownership³).

Policy CP20 states that the Council will require the provision of affordable housing on all sites of 5 or more dwellings (net) and will negotiate to achieve the following affordable housing targets:

- a) 40% onsite affordable housing provision on sites of 15 or more (net) dwellings;*
- b) 30% onsite affordable housing provision on sites of between 10 and 14 (net) dwellings or as an equivalent financial contribution;*
- c) 20% affordable housing as an equivalent financial contribution on sites of between 5 and 9 (net) dwellings.*

The overall target for Policy CP20 is to achieve approximately 30% of all housing delivery as affordable housing.

³ National Planning Policy Framework - Annex 2: Glossary: Affordable Housing, Page 67 (MHCLG, December 2023)

Figure 8: Total Gross Affordable Completions by Tenure 2010/11 – 2023/24

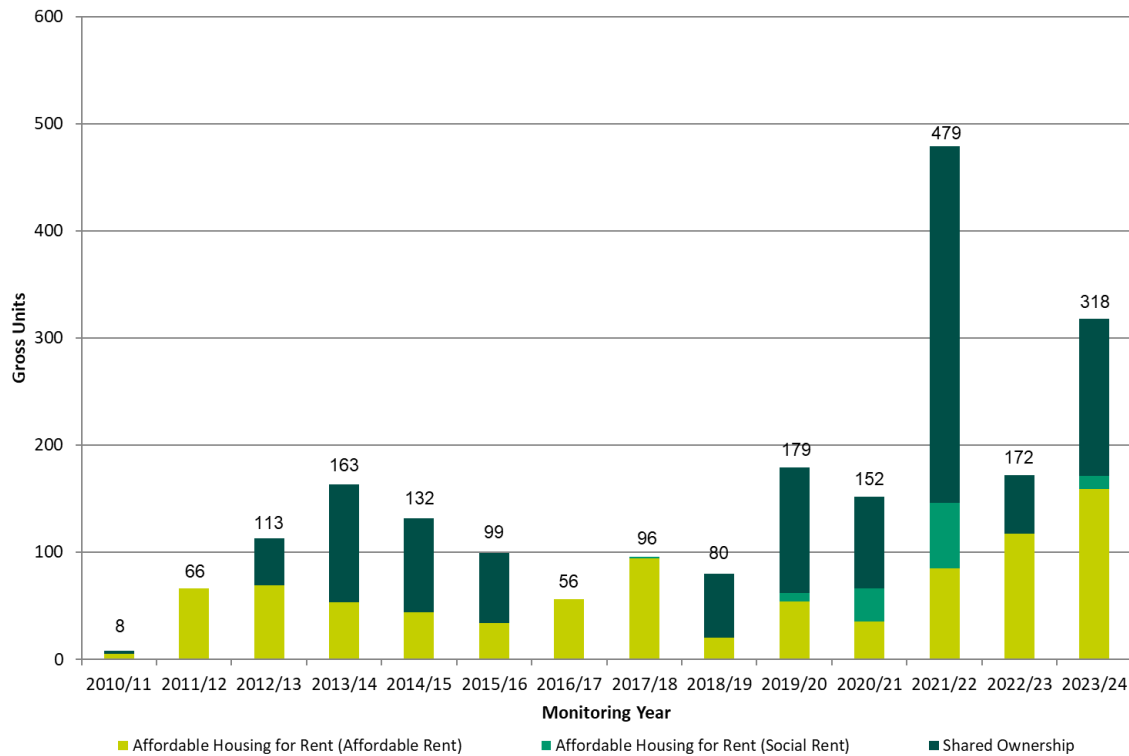


Table 3: Affordable proportion (%) of total gross units completed 2023/24

Monitoring Year	Gross Units Completed	Gross Affordable Units Completed	Affordable Proportion (%)
2010/11	384	8	2%
2011/12	378	66	17%
2012/13	374	113	30%
2013/14	509	163	32%
2014/15	645	132	20%
2015/16	751	99	13%
2016/17	423	56	13%
2017/18	490	96	20%
2018/19	424	80	19%
2019/20	613	179	29%
2020/21	529	152	29%
2021/22	1,130	479	42%
2022/23	957	172	18%
2023/24	1,149	318	28%
Sub-total 2019/20 – 2023/24	4,378	1,300	30%
Total since 2010/11	8,756	2,113	24%

Key findings:

- In 2023/24 318 affordable homes were completed (Figure 8), comprising approximately 28% of all gross completions.
- Over the past five-year period, 30% of all homes completed were affordable, in line with the City Plan target (Table 3)
- Over the Plan period since 2010, 24% of all homes have been affordable, slightly less than the overall target.
- Table 4 below shows that out of the units delivered through major developments, 36% were affordable homes, an increase on the previous monitoring year.
- The Bluebell Heights major development on the Land to the East of Coldean Lane site comprised of 242 residential units, all of which are affordable housing.

Table 4: Affordable proportion (%) of gross units completed in major developments 2023/24

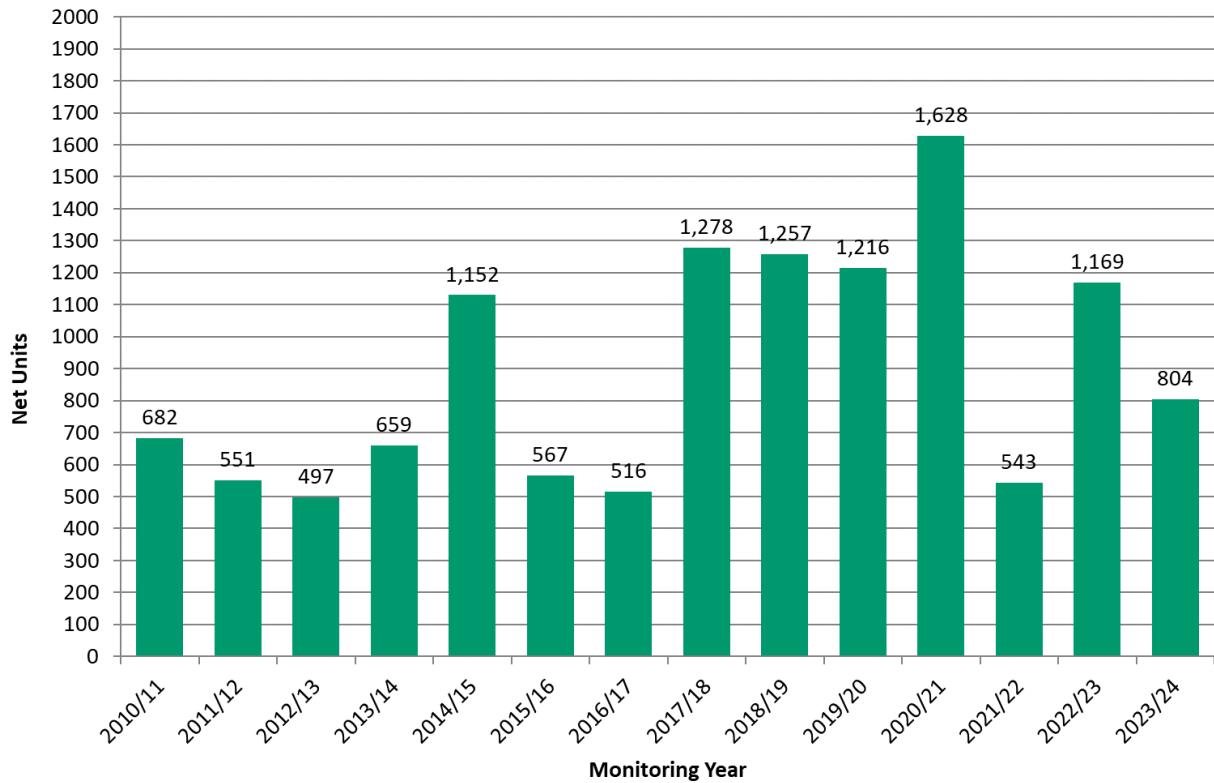
Monitoring Year	Gross Units Completed	Gross Affordable Units Completed	Affordable Proportion (%)
2018/19	119	80	67%
2019/20	377	169	45%
2020/21	320	147	46%
2021/22	896	478	53%
2022/23	624	172	28%
2023/24	879	318	36%

3. Extant Permissions

Key findings:

- There were 804 new net housing units permitted in 2023/24 (Figure 9);
- Of these, 331 of which are affordable housing units (41%)
- If delivered, this would be above the Plan target of 30%

Figure 9: Number of New Residential Units Permitted 2010/11 - 2023/24



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).

Key findings:

- There were 252 net student bedrooms in 171 self-contained units completed in PBSA in 2023/24 (Figure 10).
- Over the Plan period since 2010/11, 7,009 new student bedrooms have been developed within Brighton and Hove.

Figure 10: Number of Net Student Bedrooms Completed 2010/11 - 2023/24

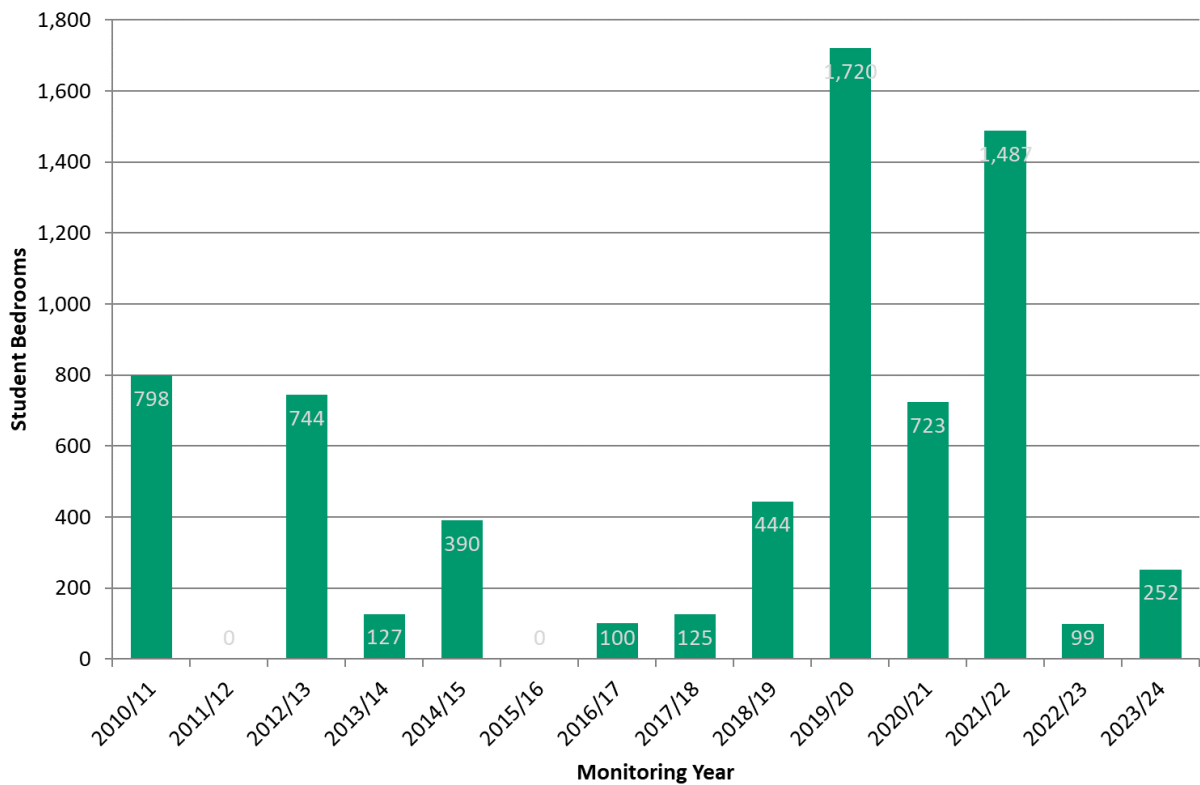
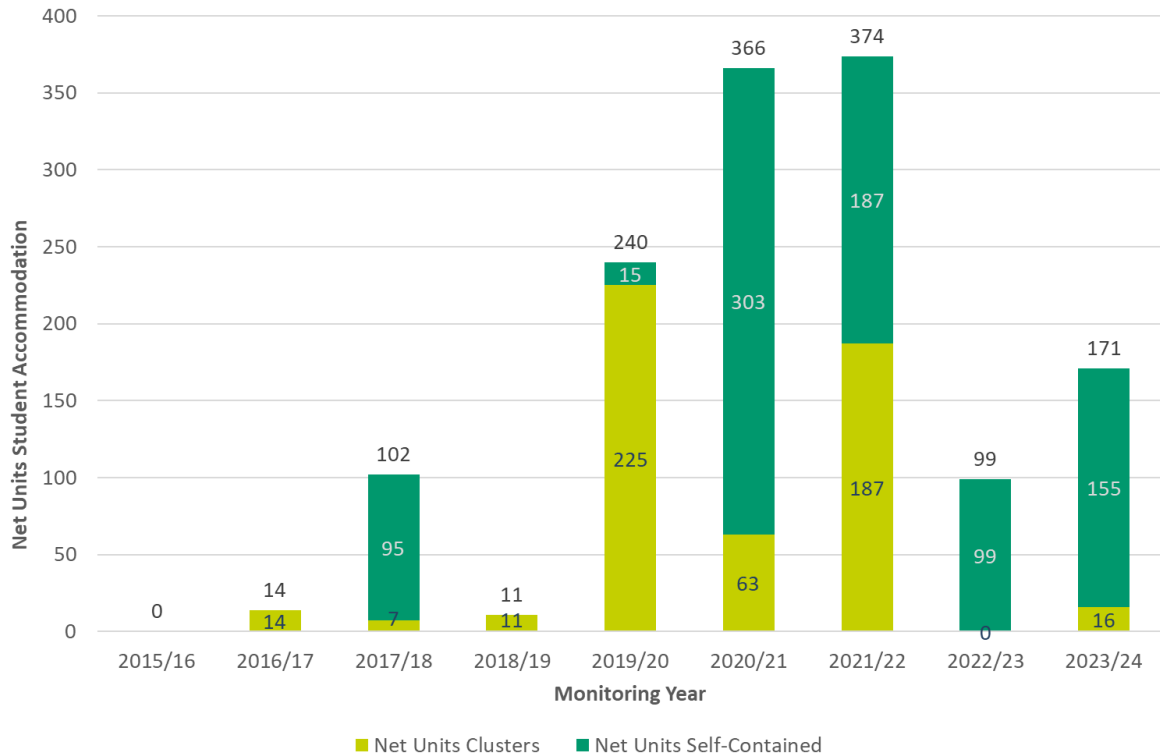


Figure 11: Number of Net Self-Contained Student Units Completed 2015/16 - 2023/24



5. Houses of Multiple Occupation

On 5 April 2013, an Article 4 Direction relating to HMOs (use class C4) came into force in five wards of Brighton & Hove which overrides national permitted development rights and for changes of use from C3 residential to C4. 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.

Key findings:

- There have been 367 planning applications, for the change of use of a C3 dwellinghouse to a small HMO between April 2013 and March 2024 in the five wards where the original Article 4 Direction took effect in April 2013 (Figure 12).
- Of these, 206 were approved and 161 refused. Of those refused, 67 have been subject to an appeal, of which 34 appeals have been allowed.

Figure 12: Decisions on HMO applications in initial five Article 4 Wards 2013/14 - 2023/24

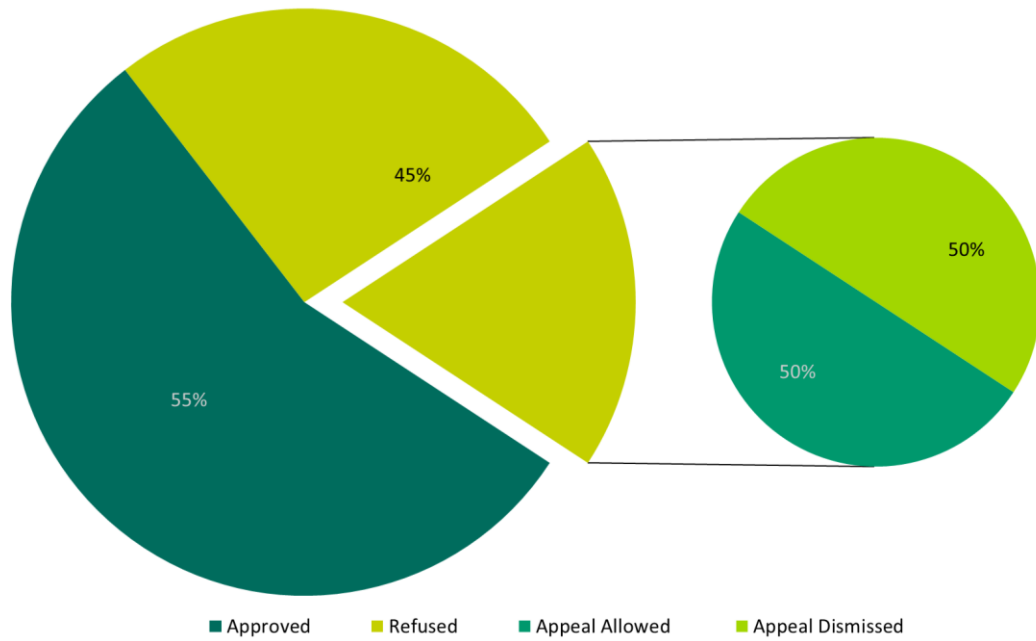
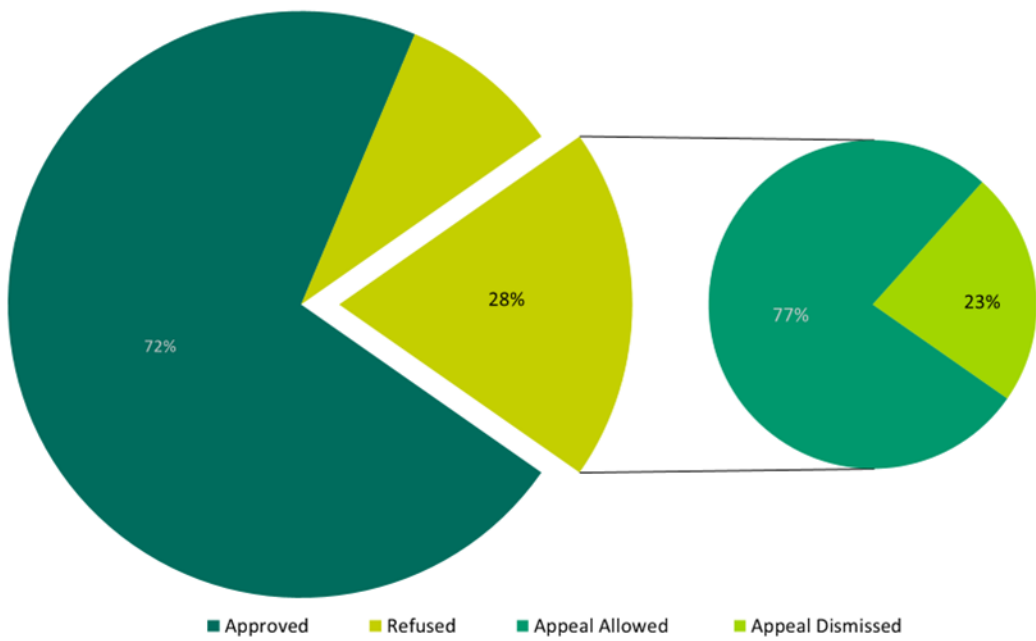


Figure 13: Decisions on HMO applications from City-Wide Article 4 from June 2020 to March 2024



- Between the implementation of the citywide Article 4 Direction in June 2020, and 31 March 2024 there were 76 planning applications, 56 approved and 20 refused, for the change of use of a single dwelling house to a small HMO (Figure 13).
- Of those refused, 14 have been subject to an appeal, of which 12 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 needs.

We have recently completed an updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) which concludes that there is a need for 7 additional permanent pitches in the City Plan area, based on the assumption that 10% of the households identified as being of gypsy and traveller origin through the 2021 Census, and living in bricks and mortar, require a pitch. We will consider this issue further as work progresses on City Plan 2041. The GTAA will be available to view on the council website.