Housing Delivery Action Plan

January 2021

Brighton & Hove
City Council

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Appendices

1. Introduction

1.1 Brighton & Hove City Council has prepared this Housing Delivery Action Plan (HDAP) to provide an overview of housing delivery in the city. The Action Plan includes:

- Explanation of the Housing Delivery Test and how Brighton & Hove has performed;
- Overview of the local context for housing delivery including the development strategy set out in the City Plan;
- Analysis of recent housing delivery and projected future housing supply;
- Assessment of the main barriers and constraints to housing delivery; and
- Potential actions which the Council is undertaking to help improve delivery in the future.

1.2 The Action Plan is intended to be a practical document aimed at increasing housing delivery which draws on local research and evidence. The actions identified in the Plan link to several other key Council strategies and documents, in particular the Brighton & Hove City Plan (see below), but also the Brighton & Hove Housing Strategy 2015[1], Economic Development Strategy[2] 2018-2023 and the Corporate Plan 2020-2023[3].

2. The Housing Delivery Test

2.1 The Housing Delivery Test (HDT) was introduced in the revised National Planning Policy Framework (NPPF)[4] in 2018. Details of how the HDT is calculated are provided in the Housing Delivery Test Measurement Rule Book[5] and further guidance on the implications is provided in National Planning Policy Guidance (NPPG)[6]. The HDT has specific consequences for local planning authorities when housing completions over the previous three monitoring years falls below the housing requirement established in the local plan.

- If housing delivery falls below 95% of the adopted housing requirement over the previous three years, the local planning authority is required to publish an action plan (HDAP);
- If delivery falls below 85% of the adopted housing requirement, a 20% buffer must be included in a local planning authority's five-year land supply (in effect this requires the Council to add a further 20% housing to the local plan housing requirement); and
- From November 2020, if delivery falls below 75% of the adopted housing requirement, the 'presumption in favour of sustainable development' set out in NPPF Paragraph 11 will apply automatically (transitional arrangements are currently in place, where the presumption applies if housing delivery falls below 25% of the housing requirement in November 2018 and 45% of the housing requirement in November 2019).

2.2 Where an Action Plan is required, the NPPG indicates that it should be prepared within six months of the test results being published to ensure that the document is as useful as possible.

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1 Brighton & Hove Housing Strategy 2015
2 Economic Strategy for Brighton & Hove 2018-2023
3 Brighton & Hove City Council Plan 2020-2023
4 MHCLG Revised National Planning Policy Framework (Feb 2019)
5 MHCLG Housing Delivery Test Measurement Rulebook (July 2018)
6 MHCLG Planning Practice Guidance: Housing supply and delivery (July 2019)

Brighton & Hove's performance against the Housing Delivery Test

2.3 The Government's 2019 Housing Delivery Test published on 13 February 2020 shows that housing delivery in Brighton & Hove over the past three years (2016-2019) has totalled only 70% of the City Plan annualised housing target for that period. The housing delivery rate shows a slight fall from the previous published Housing Delivery Test (2015-2018) which recorded 77% delivery against the City Plan target.

2.4 Housing delivery in Brighton & Hove is measured against the target set in the City Plan Part One which was adopted in March 2016. Policy CP1 sets a requirement to deliver at least 13,200[7] homes over the period 2010-2030, giving an overall average annual rate of 660 net homes per year. However, the City Plan housing trajectory allows for a stepped delivery trajectory, which assumes delivery of 655 net dwellings per year over the period 2014/15 to 2018/19, increasing to 856 net dwellings per year from 2019/20 to 2023/24, and then reducing again to 712 net dwellings per year from 2024/25 to 2030. This trajectory allows for longer lead times needed to bring forward a number of the city's key strategic development sites which are allocated in the City Plan, but anticipates a significant increase in delivery from around 2020 onwards.

2.5 For the purposes of the Housing Delivery Test, the phased housing delivery requirement for Brighton & Hove over the past three monitoring years (2016/17 to 2018/19) is therefore 1,965 net homes. Over this period, a total of 1,371 net homes have been completed, giving a HDT figure of 70% (Table 1). This level of delivery avoids the Presumption in Favour set by the Housing Delivery Test (which for 2019 is set at 45% against the local plan target). However, the Council is required add a 20% buffer onto the five year housing land supply and to prepare a Housing Delivery Action Plan.

Table 1: Brighton & Hove performance against the Housing Delivery Test 2016-2019

	2016/17	2017/18	2018/19	Total
Phased housing requirement	655	655	655	1,965
Net housing completions	353	444	380	1,177
Student accommodation No. of bedrooms Equivalent net homes (/2.5)	 0 0	 125 50	 444 178	 569 228
Other communal accommodation No. of bedrooms Equivalent net homes (/1.8)	 -37 -21	 4 2	 -28 -16	 -61 -34
Total homes delivered	332	496	542	1,371
Housing Delivery Test %				**69.8%**

[7] It should be noted that the City Plan housing requirement does not include student accommodation and other communal accommodation, however an allowance for these types of development is included in the Housing Delivery Test completions figures.

3. Local Context

3.1 Brighton & Hove is a tightly constrained, compact city with a population of 290,885[8] situated between the South Downs National Park and the sea. There is limited scope for outward expansion and new development over the past two decades has occurred almost exclusively on brownfield land.

3.2 The city includes a mix of distinct urban and suburban neighbourhoods. Residential densities in the central areas of Brighton and Hove are relatively high, with some taller buildings and a high proportion of flats/apartments. In these areas, densities of 60 to over 200 dwellings per hectare are common, whereas in the outer suburban areas development is more generally low to medium rise and lower density.

3.3 The city's existing housing includes a high proportion of flats, maisonettes and apartments which comprise 50% of the total housing stock (compared to 21% for the South East). There is a relatively low proportion of detached (10%) and semi-detached (19%) housing (compared to the South East average of 28% detached and 28% semi-detached), whilst terraced housing accounts for 21% of the city's housing stock. There is a smaller owner occupied sector compared to the regional and England average but a much larger private rented sector. Approximately 53% of housing is owner occupied, 28% private rented, and 15% affordable housing rented from the Council or a registered provider.

3.4 In recent years, high house prices and strong demand from households moving into the city, particularly from the Greater London area, have put home ownership beyond the reach of many households, whilst the cost of private renting is also high. House Price Index figures from the Land Registry show that the average house price in Brighton & Hove is now £368,011 (June 2020)[9] which is nearly 50% higher than average prices for England & Wales (June 2020). In the previous 12 months, house prices in Brighton & Hove increased by around 1%, compared to an increase of 3.5% nationally. House sales are still at relatively low levels compared to the pre-recession period (2001-08). The April 2020 figures showed a sharp fall linked to the COVID-19 pandemic which resulted in house sales falling below the levels seen at the height of the 2009 recession.

3.5 The most recent detailed analysis of household incomes in the city[10] showed that the average household income in Brighton & Hove was £38,300. However, this average is affected by the number of very high earners in the city; the median household income is £29,100, and one-third of households earn below £20,000. The average 1-bed flat costs over 9 times the median household annual income and a 3-bed house costs 16.5 times the median household annual income. A sufficient mortgage for a 1-bed flat would require an income of nearly £61,000 per annum with a £66,000 deposit, whilst a 3-bed home requires an income of over £110,500 with a £120,000 deposit.

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[8] Source: ONS Mid-Year Estimates 2019
[9] Brighton & Hove Housing Market Report 2020 Q2 Apr-Jun
[10] Objectively Assessed Need for Housing: Brighton & Hove (GL Hearn, June 2015)

3.6 The cost of renting in the city is also very high. The average rent for a 1-bed flat is £972 per month. This is equivalent to the monthly repayment cost of a £166,351 mortgage, which would require an income of over £51,000 to finance.

4. Brighton & Hove City Plan

City Plan Part One

4.1 The Brighton & Hove City Plan Part One (CPP1)[11] was adopted in March 2016 and sets out the strategic policy framework to guide the new development required across the city to 2030. It sets provision for a minimum of 13,200 new homes to be built over the period 2010-2030. It is against this minimum housing requirement that the City's housing delivery and five year housing land supply position is assessed annually.

4.2 The spatial strategy set out in the City Plan focuses primarily on maximising development opportunities from brownfield sites within the built up area. In particular, it seeks to direct a significant amount of new development to eight identified Development Areas which offer capacity for major new development/redevelopment; are well located in terms of sustainable transport/ accessibility; and are areas where new development and/or regeneration and renewal will secure substantial benefits for the city. The eight Development Areas account for 45% of the planned new housing for the city. The strategy also makes provision for some housing to be brought forward on greenfield sites on the city's urban fringe, whilst acknowledging that the scope for such development is restricted by environmental considerations, including proximity to the South Downs National Park.

4.3 Part B of Policy CP1 indicates the broad distribution of housing and that this provision is to be delivered from a variety of sources including:

- i) 6,005 dwellings to be delivered within eight 'Development Areas' (DAs) identified in Policies DA1 – DA8, which are expected to provide for the majority of housing, employment and retail development in the city – this figure includes a minimum of 3,635 dwellings on strategic site allocations identified for housing and mixed uses in Policies DA1 – DA8.
- ii) 4,130 dwellings on other sites within the city's existing defined built up area.
- iii) 1,060 dwellings on greenfield sites on the urban fringe based on information in 2014 and 2015 Urban Fringe Assessments - this figure is additional to a strategic greenfield allocation at Toads Hole Valley in Policy DA7.
- iv) 765 dwellings on small identified sites with outstanding planning permission for 5 or less dwellings.
- v) 1,250 dwellings through small windfall development – based on an allowance for developments of 5 or less dwellings likely to come forward on currently unidentified sites over the plan period.

4.4 Table 2 summarises the breakdown and broad distribution of housing provision set out in Policy CP1.

[11] Brighton & Hove City Plan Part One (adopted March 2016)

Table 2: Policy CP1 Housing provision and sources of supply

Area / Source of Supply	No. of new homes
Development Area	
DA1 – Brighton Centre and Churchill Square Area	20
DA2 – Brighton Marina, Gas Works and Black Rock Area	1,940
DA3 – Lewes Road Area	875
DA4 - New England Quarter and London Road Area	1,130
DA5 – Eastern Road and Edward Street Area	515
DA6 – Hove Station Area	525
DA7 – Toad's Hole Valley	700
DA8 – Shoreham Harbour	300
Development Area Total	**6,005**
Development Across Rest of City	
a) Within the built up area	4,130
b) Within the urban fringe	1,060
Small identified sites	**765**
Small windfall development	**1,250**
Total	**13,210**[12]

4.5 CPP1 is supported by a Housing Implementation Strategy[13] which describes the approach to managing the delivery of housing over the plan period and sets out how a five year supply of housing will be maintained to meet the planned housing target.

City Plan Part Two

4.6 The Council is currently working to prepare the City Plan Part Two (CPP2), which will include policies to support the implementation and delivery of CPP1, including identifying and allocating additional development sites. The Proposed Submission version of CPP2 was agreed by the Council on 23 April 2020 and published for consultation over an 8-week period in September/October 2020 (the consultation period having been delayed for several months due to the COVID-19 restrictions). It is intended that the Proposed Submission Plan will be submitted for examination in Spring 2021.

4.7 The work for CPP2 has included detailed assessment of sites identified through the Strategic Housing Land Availability Assessment (SHLAA) process to assess whether they are suitable for allocation for housing and/or mixed uses (including housing). Following this analysis, the majority of SHLAA sites which do not already have planning permission (and some with permissions not yet started) are proposed for allocation in CPP2. The Council's approach to

[12] The figures in the table total 13,210 dwellings against the policy target of at least 13,200 new homes.
[13] City Plan Part One Annex 3: Housing Implementation Strategy (March 2016)

identifying and selecting sites for allocation in CPP2 is set out in detail in a Site Allocations Topic Paper which was published alongside the CPP2 Proposed Submission in Autumn 2020[14].

4.8 In total, the Proposed Submission CPP2 allocates sites for a minimum of 3,600 dwellings. This included a combined total of 1,100 dwellings on four strategic sites (Policies SSA1 – SSA4), 1,570 dwellings on housing and mixed use sites within the existing built-up area (Policy H1) and 930 dwellings on greenfield 'urban fringe' sites (Policy H2). Table 3 shows the breakdown of housing delivery from the proposed allocations in CPP2.

Table 3: Proposed site allocations in the Proposed Submission City Plan Part Two (April 2020)

CPP2 policy	Sites in Development Areas	Sites in Rest of City	Total CPP2 allocations
SSA1 Brighton General Hospital		200	200
SSA2 Combined Eng Depot, New England Rd	100		100
SSA3 Land at Lyon Close, Hove		300	300
SSA4 Sackville Trading Estate and Coal Yard	500		500
H1 Housing and Mixed Use - Housing sites	304	747	1,051
H1 Housing and Mixed Use - Mixed use sites	335	184	519
H2 Housing Sites – Urban Fringe		930	930
Total	**1,239**	**2,361**	**3,600**

5. Analysis of Housing Delivery

5.1 The Council's most recent comprehensive assessment of housing land supply is set out in the SHLAA Update 2019[15]. That report provides data on housing completions up to 31 March 2019, and monitors progress on developments with extant planning permissions and strategic sites allocated in CPP1. The SHLAA also identifies other sites without planning permission that are considered deliverable or developable within the next 15 years based on an assessment of their availability, suitability and achievability in accordance with the NPPF and NPPG. The SHLAA is updated and published annually and forms the basis for the Brownfield Land Register (BLR) which provides a published list of all previously developed (brownfield) sites of 0.25 hectares/5 or more dwellings that are considered suitable, available and achievable for housing development.

5.2 Appendix 1 presents the updated housing trajectory set out in the SHLAA 2019. It clearly illustrates that net housing completions since 2010 have (with the exception of 2015/16) consistently fallen short of the annualised City Plan housing requirement of 660 net dwellings per year. However, the trajectory also shows that projected housing delivery is expected to

[14] Site Allocations Topic Paper (November 2019)
[15] Strategic Housing Land Availability Assessment (SHLAA) Update 2019

increase substantially over the next few years. That assumption is explored in greater detail in this Action Plan.

5.3 Overall, based on the monitoring position at 1 April 2019, there is identified potential to deliver at least 14,875 net dwellings, which would exceed the City Plan target by 1,665 dwellings. Table 4 presents a summary comparison of the projected housing supply against the City Plan (Policy CP1) target for the different identified sources of housing supply.

Table 4: SHLAA 2019 Identified housing supply position against City Plan target

Housing provision by source	Policy CP1 housing provision	Total potential supply	Position against Policy CP1
Development Areas	6,005	6,172	+167
Rest of City	5,190	5,253	+63
Small sites (identified + windfall)	2,015	3,004	+989
Prior Approval for change of use to residential	0	214	+214
HRA Estates Regeneration (additional potential)	0	232	+232
Total	**13,210**	**14,875**	**+1,665**

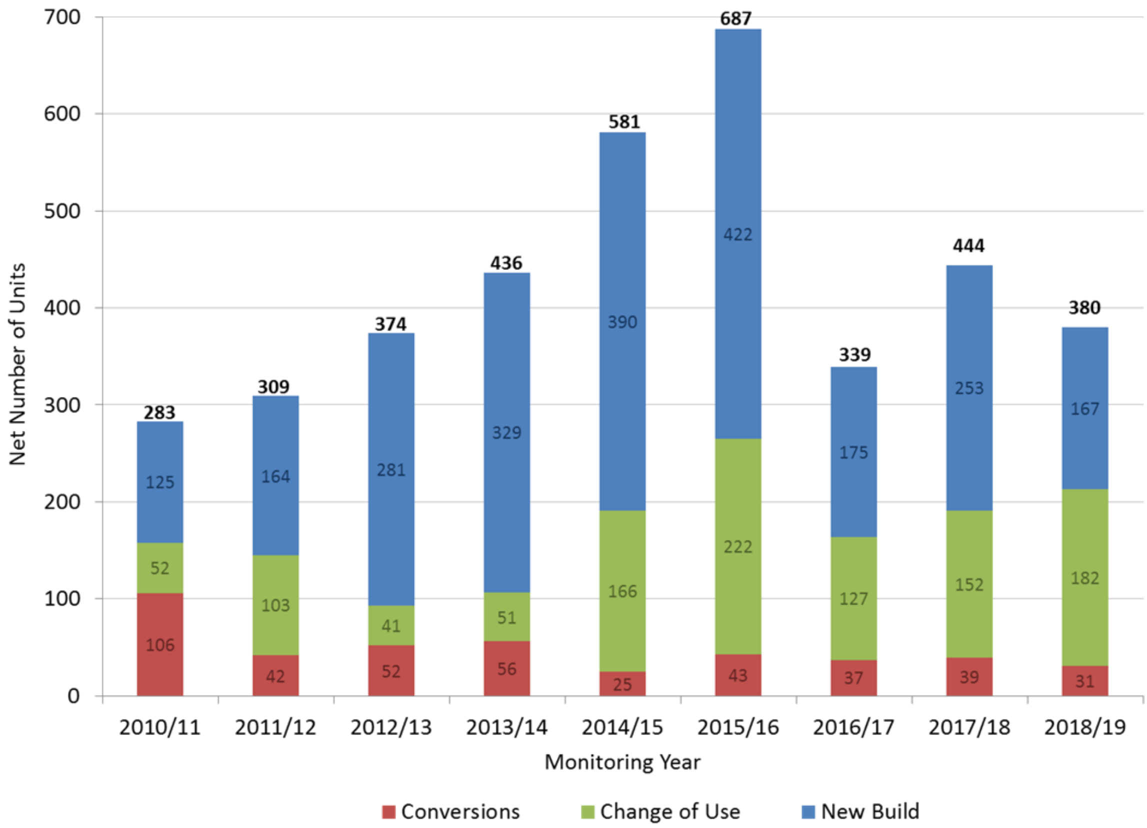
Net residential completions

5.4 The Council publishes detailed analysis of residential development on an annual basis in the Authority Monitoring Report (AMR): Residential Development[16]. Figure 1 presents analysis of net housing completions over the period since 2010. During this period, net residential completions have averaged only 426 units per year against the annualised City Plan housing target of 660 homes per year. The breakdown by type of housing development indicates that new build has consistently provided the most significant contribution, accounting for 60% of housing delivery over the period 2010-2019. This compares to 29% for changes of use and 11% for conversions.

5.5 A notable recent trend is the increase in residential development through change of use. This has followed the introduction of permitted development rights for change of use from office to residential use in 2013. These developments require prior approval from the local authority but are not subject to the normal planning process. Over the past five years (2014/15 to 2018/19), an average of 107 residential units have been delivered through prior approvals.

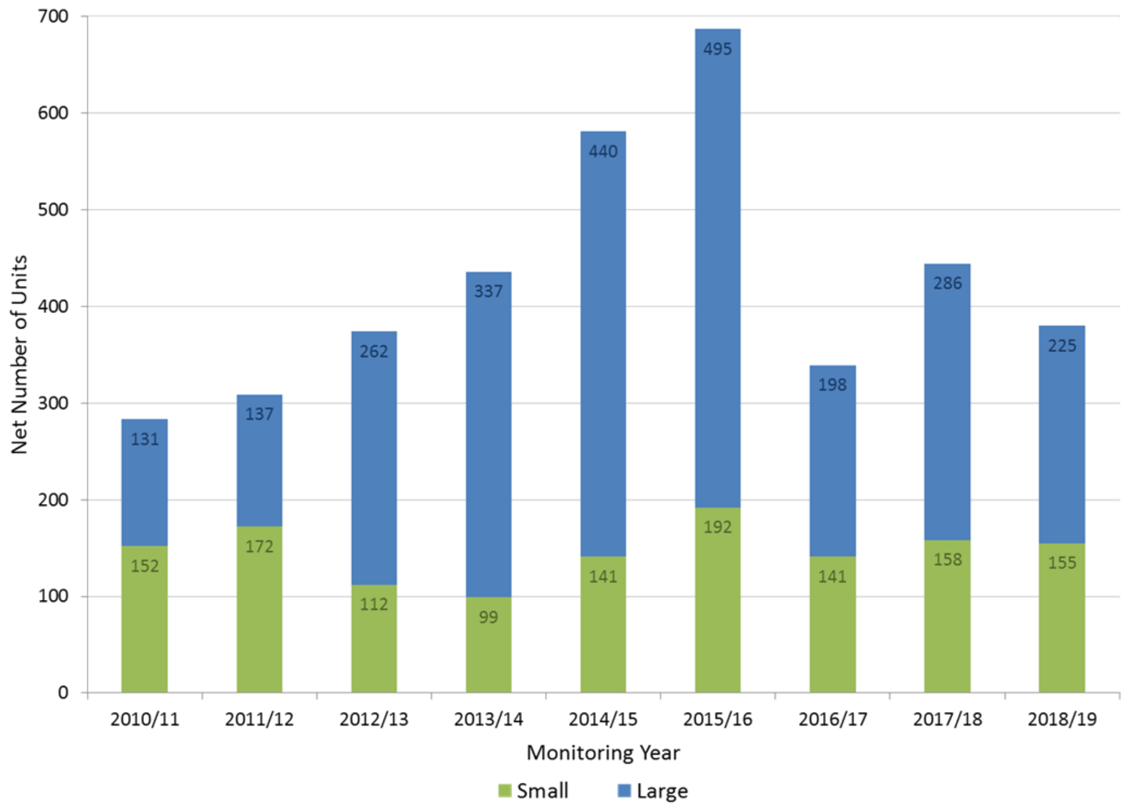
[16] Authority Monitoring Report 2018/19: Residential Development

Figure 1: Net completions by residential development type 2010-2019



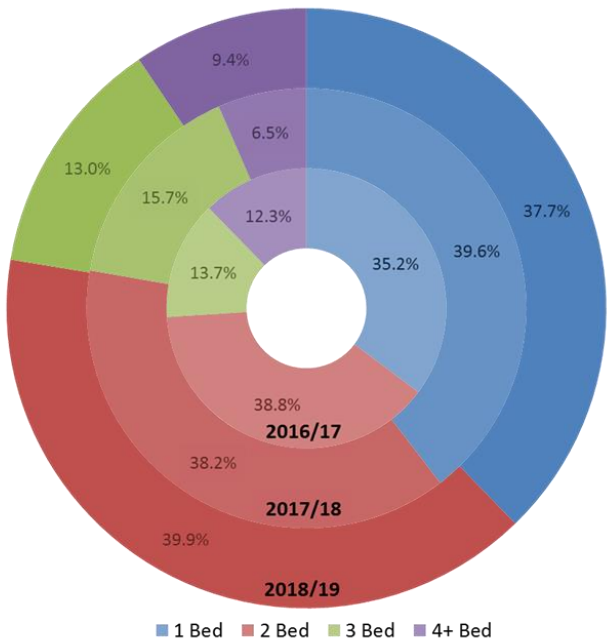
5.6 Figure 2 presents analysis of net residential completions by development size. Over the period 2010-2019, around two-thirds (67%) of housing delivery has been on large developments (6+ units), with one-third (33%) occurring through small developments (<6 units). This clearly indicates that bringing forward development on large sites is critical in terms of increasing housing delivery in future years. However, small developments (<6 units) are an important source of supply in Brighton & Hove, providing an average of 143 net dwellings per year since 2010 (which is significantly above the target set in the City Plan).

Figure 2: Net residential completions by development size 2010-2019



5.7 A very high proportion of new development in recent years has been in the form of flats and apartments which have accounted for nearly 80% of new residential units over the period 2016-2019. As highlighted in Figure 3, a similarly high proportion of residential development has been 1-bed and 2-bed units (77% of new housing over the period 2016-2019).

Figure 3: Proportion of residential units (gross) by unit size 2016-2019



5.8 These recent housing delivery figures can be compared with previous demographic analysis of the demand/ need for homes in the city over the plan period, which indicated that an estimated 65% of overall need/demand (for both market and affordable homes) will be for two and three bedroom properties (34% and 31% respectively), with 24% for 1 bedroom properties and 11% for four-plus bedroom properties. Compared to this need/demand, there has been a relatively stronger supply of smaller residential units. This largely reflects the character of the sites available in the city, with a high proportion of constrained and often high value brownfield sites and very limited opportunities for greenfield development on the urban fringe.

Net residential units permitted & commenced

5.9 The evidence set out in the AMR 2018/19 indicates a clear upward trend both in the amount of housing permitted and the number of units under construction. In 2018/19 there were 1,378 net units permitted through 190 applications[17] including applications for prior approval for the change of use to residential through permitted development. This was similar to the 1,487 net units permitted in the previous monitoring year (2017/18), but almost double the 706 net units permitted in 2016/17. The number of residential units permitted over the two years 2017/18 and 2018/19 has been significantly higher than in all earlier years since the start of the City Plan period in 2010. A list of major developments of 10+ dwellings that gained planning permission in 2018/19 is presented in Appendix 2. These included large scale developments on the site of the former Amex House at Edward Street (168 dwellings); the Greater Brighton Metropolitan College Pelham Street (135 dwellings); Westerman Complex, School Road (104 dwellings outline permission); and the former St Aubyn's School in Rottingdean (90 net dwellings). In addition, permission was granted on appeal at 1-3 Ellen Street (186 dwellings).

Table 5: Net residential units commenced by year 2013/14 to 2018/19

	Commenced during year	Commenced at monitoring year end	Permitted during year
2013/14	439	657	713
2014/15	602	837	1,152
2015/16	554	1,011	610
2016/17	507	1,088	706
2017/18	968	1,609	1,487
2018/19	562	1,776	1,378

5.10 At the end of the monitoring year there were 1,776 net residential units under construction, which represents an increase an increase on the previous year and continues an upward trend in commenced development since 2013/14 (Table 5). During 2018/19 development commenced on sites delivering 562 units. The increasing number of residential units under

[17] Discounting any multiple applications made on the same site.

construction is expected to lead to higher delivery rates over the next few years. The residential developments of 6+ dwellings under construction are listed in Appendix 3.

Analysis of housing supply by stage of development

5.11 Analysis of the housing supply pipeline by planning status and stage of development provides a good indication of the robustness of the future housing supply projections. Projections of future housing development involve making a range of assumptions about delivery timescales. The phasing assumed for individual sites in the SHLAA has been informed by Historical Delivery Rate Assessments which were previously undertaken as part of the preparation of the 2017 SHLAA. This included analysis of a sample of developments where residential units had been delivered over the previous ten years (2007-2017), looking at the period of time taken from planning consent to commencement of development ('lead in time') and from commencement on site to completion ('build out time'). This assessment showed that average 'lead in times' varied from around 8 months for developments of less than 30 units to more than 12 months for schemes of 100+ units. Average 'build out times' varied similarly based on size of development from around 17 to 24 months. Total average delivery timescales therefore varied from around 2 years for smaller schemes to over 3 years for larger schemes. Further details on the Delivery Rate Assessment are included in the SHLAA 2017 Update[18].

5.12 Table 6 shows the projected housing completions over the next five monitoring years (2019/20 to 2023/24) based on the housing trajectory in the 2019 SHLAA. A high proportion of housing developments projected for delivery in the next few years has already commenced or comprises small sites which already have planning permission. Development already commenced accounts for 82% of projected housing supply in Year 1 (2019/20) and 57% of housing supply in Year 2 (2020/21). Looking further ahead, the majority of projected supply in Years 3 to 5 (2021/22 to 2023/24) has either commenced or has detailed planning permission. Appendix 3 shows the projected housing delivery from sites of 6+ dwellings recorded as under construction in the 2019 SHLAA.

5.13 More detailed analysis has also been undertaken looking at the recent progress of the sites of 6+ dwellings recorded in the 2019 SHLAA as having outline planning, detailed planning permission not started, or as an application under consideration. Full details are presented in Appendix 4.

[18] SHLAA Update 2017 Appendix

Table 6: Projected housing delivery over the next five years (2019/20 to 2023/24)

	Projected net completions				
	2019/20	2020/21	2021/22	2022/23	2023/24
<u>Large sites - 6+ dwellings</u>					
Already commenced	394	296	180	305	132
Detailed permission not started		121	523	530	514
Outline planning permission			61	53	
Application approved subject to s106		10	100	246	
Application under consideration			14	7	100
Pre-application discussions			24		55
Commenced (technical start)		41	184		49
No planning application yet			37	9	9
Sub-total	*394*	*468*	*1,123*	*1,150*	*859*
<u>Small sites - <6 dwellings</u>					
Small sites commenced	73	73			
Small sites not started	62	62	62		
Small sites windfall			95	157	157
Sub-total	*135*	*135*	*157*	*157*	*157*
Prior Approvals (projected)	43	43	43	43	42
TOTAL	**572**	**646**	**1,323**	**1,350**	**1,058**

Outline planning permissions

5.14 In the 2019 SHLAA, three sites were recorded as having outline planning permission. Reserved Matters have since been approved for one site (10 Shirley Drive, Hove). A second site (Land adjacent to Ovingdean Road) has been subject to discharge of planning conditions attached to the outline permission, whilst the third site (Coombe Farm, Saltdean) is subject to a planning application for a revised scheme for an increased number of dwellings.

Detailed permissions not yet started

5.15 In the 2019 SHLAA, there were 27 sites in this category totalling 1,688 net dwellings. Of these, 11 developments totalling 920 net dwellings had commenced by November 2020 and one site of 12 dwellings had been completed (Buckley Close). A further site (108 North St, Portslade) is being converted from office to residential through permitted development (Prior Approval). Planning permission had lapsed on two sites totalling 15 net dwellings.

5.16 The 2019 SHLAA included a further three sites totalling 356 net dwellings which had been approved by Planning Committee subject to a s106 agreement. Work has now commenced on two of these schemes.

Planning applications under consideration

5.17 In the 2019 SHLAA, there were three planning applications under consideration totalling 901 net dwellings. The most significant of these was the outline application for a major strategic development including up to 880 residential units at Toad's Hole Valley, the city's largest greenfield allocation. That application has still not reached Planning Committee due to the scale and complexity of the proposal, and its location close to a strategic road junction. These issues have extended the time needed to ensure that sufficient mitigation is in place, with the transport proposals in particular requiring further detailed assessment and amendment which is still in progress. Due to the longer lead times for this development (i.e securing approval of Reserved Matters, undertaking pre-commencement investigations and site works etc), it is projected that only 100 dwellings will be built out within the five year period to 1 April 2024.

Further planning permissions since the 2019 SHLAA

5.18 In addition to the sites/planning applications considered above, a further 15 developments of 6+ dwellings totalling 1,056 net dwellings have gained planning permission since the 2019 SHLAA. These sites are listed in Appendix 5. They include a large scale development at the Sackville Trading Estate/Coal Yard site in Hove (including 564 build to rent residential units which also includes a 260 unit care community) and further significant developments at the KAP site, Newtown Road (148 units) and the Greater Brighton Metropolitan College (135 units)[19].

Projected supply of communal residential accommodation

5.19 The HDT allows for development of student accommodation and other communal accommodation to be counted towards the overall housing delivery figure. Communal accommodation is accounted for by applying nationally set ratios based on 2011 Census data. The ratio applied for student accommodation is 2.5 student bedrooms equivalent to one dwelling, whilst for other communal accommodation, a ratio of 1.8 bedrooms equivalent to one dwelling is applied.

Purpose built student accommodation

5.20 Brighton & Hove's two universities host approximately 30,000 full-time students at campuses within the city, with the British and Irish Modern Music Institute and a significant number of language schools further adding to the city's total student population. Over the past decade, there has been a significant increase in student numbers in the city with the total number of student households, including those in Purpose Built Student Accommodation (PBSA), increasing from an estimated 6,617 to 8,400 between the 2010/11 and 2018/19[20]. However, the supply of PBSA has not matched the past expansion of the student population, particularly at the University of Brighton, and this has led to a significant increase in the number of

[19] Planning permission was granted in March 2019 and was listed in the AMR 2018/19 but not in the SHLAA 2019.

[20] These figures are based on monitoring of the number of properties that benefit from a Council Tax exemption during each year by being solely occupied by students.

students requiring private rented accommodation. The market has reacted to this demand through increasing numbers of family homes converted to Houses in Multiple Occupation (HMOs) in the city.

5.21 The Council has sought to control the over-concentration of HMOs in parts of the city through the use of Article 4 Directions, however the City Plan (Policy CP21 and draft Policy DM8) also includes positive policies to encourage new PBSA development, including through provision of specific site allocations. As shown in Table 7, there is now a substantial identified future supply of over 5,000 student bedspaces in the city arising both through university managed and privately operated PBSA developments. Most of the identified supply is already under construction and expected to be completed within the next four years, including major developments at East Slope (University of Sussex), Preston Barracks and Circus Street.

Table 7: Projected supply of Purpose Built Student Accommodation (PBSA)

	2019/20	2020/21	2021/22	2022/23	Not known	Total
University of Sussex						
East Slope	1,081					1,081
West Slope					1,122	1,122
University of Brighton						
Circus Street	450					450
Preston Barracks		804				804
Privately operated						
55-61 Portland Road	12					12
Willow Surgery, Bevendean		19				19
54 Hollingdean Road	177					177
Preston Barracks		534				534
Pelham Terrace		189				189
118-132 London Road			232			232
Park Wall Farm Cottages			71			71
IQ Brighton Abacus House			6			6
1 Moulsecoomb Way				137		137
CPP2 Allocations						
Lewes Road Bus Garage					150	150
45 & 47 Hollingdean Road				99		99
Total	**1,720**	**1,546**	**309**	**236**	**1,272**	**5,083**

Other communal accommodation

5.26 Other forms of communal residential accommodation (C2 uses) include accommodation for older persons (residential/nursing homes and extra care/assisted living) and supported accommodation for specialist and vulnerable needs. The demand for communal accommodation for the elderly is expected to increase within the city in the future due to the aging population and increasing prevalence of long-term health problems as people live longer. The Older People Housing Needs Assessment which was commissioned by the Council in 2019 has identified increasing potential demand for both nursing homes and housing with care (extra care/assisted living) over the period to 2030 and beyond[21]. However, at present the Council does not specifically monitor the future supply of developments falling within these categories, and therefore no figures for planned communal accommodation are currently available.

6. Future projected Housing Delivery Test Performance

6.1 Based on the analysis undertaken, Table 8 presents the projected supply of both C3 housing development and student accommodation and sets out how this is expected to affect the HDT results for Brighton & Hove over the next four years (2019/20 to 2022/23).

Table 8: Housing Delivery Test - Projected future delivery

	Projected net completions			
	2019/20	**2020/21**	**2021/22**	**2022/23**
C3 Housing	572	646	1,323	1,350
Purpose Built Student accommodation[1]	688	618	124	94
Other communal accommodation[2]	na	na	na	na
HDT net completions	1,260	1,264	1,447	1,444
Annual HDT housing target	856	856	924	924
3-Year HDT Housing target	2,166	2,367	2,636	2,704
Projected 3-Year HDT net completions	2,298	3,066	3,971	4,155
Projected HDT percentage	**106%**	**130%**	**151%**	**154%**

Notes:
1 2.5 bedrooms equivalent to 1 dwelling
2 1.8 bedrooms equivalent to 1 dwelling

6.2 The figures identify a significant improvement in projected housing delivery over the next four years, reflecting the substantial level of housing and student accommodation now under construction or with detailed planning permission. It should be emphasised that the HDT measures average delivery over the previous three years and therefore the recent increase to housing supply evidenced by increased permissions granted and development under construction will take some time to translate into an improved performance against the HDT.

6.3 Overall, there are clear signs that delivery will improve significantly from 2019/20 onwards. This is supported by:

- The significant level of residential development already under construction, which is mainly expected to come forward over the next three years;
- The substantial number of detailed planned permissions approved over the past two years; or gaining Planning Committee approval subject to s106 agreement;

[21] Older People Housing Needs Assessment (Housing LIN, November 2019)

- The substantial development pipeline of purpose built student accommodation with several major sites now under construction, most notably Circus Street and Preston Barracks; and
- Strong Council commitment to the direct delivery of affordable housing on Council-owned land – this is discussed in more detail under 'Actions and Responses'.

6.4 The residential development monitoring figures for 2019/20 will be published in the 2020 Strategic Housing Land Availability Assessment (SHLAA) and analysed further in the AMR 2019/20, both of which the Council is intending to publish in early 2021.

7. Review of Key Issues and Challenges

7.1 As part of the work for the previous Housing Delivery Action Plan (published August 2019), the Council consulted with agents, developers and landowners to gain a fuller understanding of the issues that may be constraining delivery of new housing in the city. This included a questionnaire survey circulated to all members of the Planning Agents' Forum (PAF) which comprises planning agents who regularly submit planning applications to the City Council. The questionnaire asked the agents to consider the relative importance of a range of specific factors (e.g lack of sites, development viability issues, delays in the planning process etc) in constraining or slowing down housing delivery. Appendix 6 presents a copy of the questionnaire.

7.2 Responses were received from nine planning agents who together are involved in a high proportion of current and planned future housing developments in the city. This was followed up by discussion of the issues raised at a meeting of PAF on 16 July 2019, which was attended by six of the agents that had responded. Drawing on the PAF survey responses, a summary of the key issues and challenges affecting housing delivery in Brighton & Hove is set out below. Appendix 6 provides a more detailed analysis of the PAF responses.

Lack of available land and complexity of development sites

7.3 As highlighted in this Action Plan, there is a relative shortage of available development land in the city. In particular there is a lack of suitable greenfield land except for a few urban fringe sites proposed for allocation in the City Plan. Whilst there are substantial opportunities for brownfield redevelopment, particularly within the Development Areas identified in the City Plan, many sites involve the loss of valued non-residential uses that City Plan policies seek to protect (e.g employment uses). This limits the scope to increase the overall amount of land allocated for housing development or to alter the mix of sites allocated in the City Plan.

7.4 As significant as the overall lack of sites is the complexity of developing many of the available sites. The majority of potential opportunities are brownfield sites, which brings additional costs relating to demolition and site remediation. Development also often raises complex issues of design due to potential amenity impacts on neighbouring properties (e.g overlooking, loss of sunlight/daylight, noise etc), the need to address heritage issues (Brighton & Hove has

34 conservation Areas and 3,400 listed buildings), and issues relating to access, parking provision and mitigation of traffic impacts.

7.5 The general lack of sites available for development was considered to be a 'Very Important' constraint by the majority of PAF respondents (5 out of 9), whilst the complexity of development sites was considered 'Very Important' by three PAF respondents and 'Quite Important' by the remaining six respondents.

7.6 In their comments, some respondents considered that there is scope to increase housing densities on some sites, including the urban fringe sites where it was felt that the densities proposed in CPP2 are much lower than the general density requirements set in CPP1. A view was also expressed that residential space standards could be relaxed or applied more flexibly.

7.7 The City Plan already seeks to encourage high densities on brownfield sites, including by promoting taller buildings (6 or more storeys) in appropriate locations within the city, but this is subject to design considerations and impacts on surrounding areas including residential amenity. All available brownfield sites have been subject to detailed assessment through the SHLAA in terms of their development capacity, and this has been subject to further review through an independent Housing and Employment Land Study[22]. Development sites on the urban fringe are subject to landscape sensitivities (in particular the setting of the South Downs National Park) and many are also affected by environmental designations. The scale and density of housing appropriate on the urban fringe have been established following detailed Urban Fringe Assessment studies undertaken for the Council in 2014 and 2015.

Economic/housing market uncertainty

7.8 Perhaps surprisingly, economic/housing market uncertainty was considered 'Very Important' by only two PAF respondents, although considered 'Quite Important' by the remaining seven respondents. The wider economic outlook nationally is uncertain due to the potential longer term impacts of "Brexit" (now further accentuated by the impact of the COVID-19 pandemic which has post-dated the 2019 survey). However, at present there is no evidence of a general slow-down in development activity and house prices remain relatively buoyant.

7.9 Within the city, there are examples of sites that have achieved planning permission but have then been sold or have remained implemented over a number of years. Economic/housing market uncertainty may be a factor in permissions not being implemented, but lack of development is also related to issues such as land value expectations, access to finance/cost of interest payments, and the extent of freeholder/leaseholder motivation to develop the site. The specific circumstances leading to stalled developments need to be better understood on an individual site basis, however in general terms the housing market and development in the city remain reasonably dynamic.

[22] Housing and Employment Land Study, (DLP Planning, Dec 2017)

Development viability and affordable housing requirements

7.10 Planning obligations and affordable housing contributions impact upon the viability and deliverability of schemes within the city. It should be noted that, since the 2019 survey, the Council has introduced a Community Infrastructure Levy (CIL) which commenced on 5 October 2020, although any impact of this on housing development will not become apparent for some time.

7.11 Both development viability and affordable housing provision were considered 'Very Important' by the majority of PAF respondents (5 out of 9 in each case) and 'Quite Important' by almost all others.

7.12 In comments, several PAF respondents highlighted the impact of affordable housing requirements, including suggestions that affordable housing/CIL requirements should be relaxed. More specific views were expressed that:

- The threshold for affordable housing and proposed threshold for CIL are too low and should be relaxed as these costs impact disproportionately on small developments.
- The threshold for affordable housing contributions should be raised so that they apply only to developments of over 10 dwellings (i.e in line with the NPPF guideline).
- A more relaxed approach should be applied to the requirement for provision of affordable housing onsite, allowing for the wider use of financial contributions (commuted payments) in lieu of onsite affordable provision. It is common experience that affordable housing providers are less willing to bid for schemes involving small numbers of affordable units which are relatively more expensive to manage.

7.13 City Plan policy seeks 40% onsite affordable housing in developments of 15 or more (net) dwellings, with lower proportions of affordable housing or equivalent off-site contributions sought on smaller schemes down to 5 dwellings. Where proposed developments cannot meet these requirements, the Council requires the applicant to submit a viability assessment which is made subject to independent review. Over recent years (since public funding for affordable housing has become less available), many residential applications have fallen well short of the affordable housing policy requirements, particularly those on brownfield sites and mixed use schemes.

7.14 Prior to the introduction of CIL, the Council commissioned detailed assessments of development viability for residential and other land uses (including purpose built student accommodation and C2 extra care/assisted living)[23]. This analysis showed that in general terms there was sufficient development value to support CIL charging (linked to a reduction in s106 contributions) for residential development throughout the city, with the exception of a small number of strategic redevelopment sites which are nil CIL rated. Whilst residential development in all parts of the city is considered to be generally viable, the differentials in land and development values have been reflected in three CIL charging zones, ranging from

[23] The Draft CIL Charging Schedule and supporting CIL Viability reports can be viewed on the [Brighton & Hove Council CIL Examination Library webpage]

£175/sq.m in central Brighton and the Seafront to £75/sq.m in some of the outer wards in the west and east of the city.

Delays in achieving planning permission and discharge of conditions

7.15 The PAF responses highlighted a range of issues concerning the operation of the Council's planning service, including comments about the timescales involved at various stages of the planning process and concerns about consistency. The majority of PAF respondents (7 out of 9) considered that s106 negotiations were a 'Very Important' factor in slowing down housing delivery, whilst pre-commencement conditions were also considered 'Very Important' by four respondents and 'Quite Important' by a further three respondents.

7.16 In addition, the PAF responses included a range of specific comments including:

- Council planners should take a more proactive approach to encourage development and engage with architects and developers at an earlier stage concerning design, proposed uses and economic viability.
- Officers should respond to pre-application enquiries more quickly as delays discourage developers from using this route.
- Concerns over delays in obtaining responses from planning application consultees and the lack of direct access to consultees to discuss any issues they raise.
- Calls to reduce the number of planning conditions attached to permissions granted.
- Calls to relax planning application validation requirements.

7.17 As demonstrated in the analysis of housing delivery in this Action Plan, there is a substantial supply of residential development which already has planning permission (either under construction or not started). In the Council's view, delays in the planning process are not currently the primary cause of housing under-delivery in the city. It should also be highlighted that the Council's performance in determination of major applications has consistently far exceeded the national target since the indicator was introduced in September 2016.

7.18 However, the Council acknowledges that there is a need to improve timescales for determining minor applications and discharging planning conditions, and is actively seeking to address these issues through an ongoing programme of 'modernisation' within the Planning Service. Further details are provided under 'Actions and Responses' below.

Infrastructure and utilities issues

7.19 Infrastructure issues were considered 'Very Important' by only one PAF respondent, although 'Quite Important' by a further six respondents. As a compact city with limited greenfield opportunities, there are no major strategic infrastructure constraints preventing development coming forward. However, there are some developments which require delivery of substantial supporting infrastructure (e.g at Brighton Marina and Toad's Hole Valley).

7.20 The City Plan is supported by an Infrastructure Delivery Plan[24] which details the physical, social and environmental infrastructure that will be required to implement the proposals set out in the plan. It remains important to ensure that infrastructure requirements and associated abnormal costs/ viability issues do not prevent or slow down developments coming forward. As set out under 'Actions and Responses' below, the Council is actively developing partnerships with central Government and regional partners to unlock stalled sites, including securing funding from central Government and through the Local Enterprise Partnership (LEP).

8. Actions and Responses

8.1 Set out below are a range of positive actions that the Council is putting in place to increase housing supply and to address the low rates of housing delivery against the City Plan housing target.

A. Direct delivery of housing

i) New Homes for Neighbourhoods

8.2 The Council has set a target to deliver 800 new affordable homes by 2023. The New Homes for Neighbourhoods (NHFN) programme seeks to develop new rented Council homes on Council-owned land. It works with local resident associations, ward councillors, council staff and partners to improve council estates and neighbourhoods, while making best use of council housing land and buildings to deliver new, affordable rented homes that the city needs.

8.3 Since 2015, 226 Council homes for affordable rent have been completed in 14 projects under NHFN with a further potential identified supply of around 600 homes identified, including 46 which already have planning permission. In addition, there is potential for redevelopment of some existing council housing.

8.4 The current programme and projected next phases are shown below.

Programme phase	No. homes	Date/target date
Phase 1 (completed homes)	172	Complete June 2018
Phase 2 (on site/with agreement to progress)	54	Complete Dec 2020
Phase 3 (next phase of projects)	80	Due for completion by Mar 2022
Phase 4 (medium term pipeline)	c387	Due for completion 2022/23
Phase 5 (longer term pipeline)	c268	Due for completion 2023/24
PROJECTED TOTAL	**c961**	

8.5 The Council is currently developing an accelerated pipeline of NHFN projects to take advantage of the Government's lifting of the Housing Revenue Account (HRA) borrowing restrictions. The removal of the HRA Borrowing Cap will enable substantial growth in the numbers of homes that can be built or purchased within the HRA alongside the continued

[24] City Plan Part One Annex 2: Infrastructure Delivery Plan (July 2017)

investment in existing homes. The delivery of viable schemes and therefore the levels of future borrowing are likely to depend on the availability of Right to Buy (RTB) receipts and other forms of grant funding available. Current rules only allow RTB receipts to pay for 30% of build costs, although the Government has recently consulted on the use of receipts.

ii) Homes for Brighton & Hove (Living Wage Joint Venture)

8.6 Homes for Brighton & Hove is a partnership between Brighton & Hove City Council and the Hyde Group set up to create 1,000 new affordable homes for rent and sale for lower income, local working households in the city. The combined additional investment will total over £100m. The new developments will be 100% affordable housing, with 50% of the new homes available to rent at levels affordable for working Brighton & Hove residents earning the new National Living Wage, and the remaining 50% provided as shared ownership homes.

8.7 By working together through the Homes for Brighton & Hove partnership, it is intended to speed up the delivery of new homes and address the need demonstrated by the City Plan and Housing Strategy. All the housing will be for people living and/or working in the city.

8.8 The target is to build 1,000 new homes over five years, with over 500 new homes planned in the first wave of the development. The first developments are:

- Land at Coldean Lane, Brighton – Development of 242 residential apartments in on urban fringe site. Planning permission granted March 2020.
- Former Belgrave Day Centre, Clarendon Place, Portslade – Redevelopment of a former training centre for 104 residential apartments. Planning permission granted April 2020.

Identification of further sites is underway.

8.9 The Homes for Brighton & Hove initiative gives the Council a method of increasing the supply of affordable homes that does not require HRA funding or land, which will ensure that HRA land can be prioritised for Council led development. It includes investment of approximately £60m in affordable housing from both the Council's General Fund and from Hyde Housing, and uses Hyde's expertise in development management to take forward these sites without impacting on the capacity of Council teams.

iii) Hidden Homes initiative

8.10 This is a Council programme to refurbish and convert under-used or unused spaces within existing Council stock into new homes. Fifteen new homes have been delivered to date, with a further 11 due to be delivered in 2020/21. There is a pipeline of potential sites to deliver approximately 20 further units.

iv) Home Purchase Policy

8.11 This scheme was initially set up to enable the Council to buy back homes that have been sold under 'right to buy' to be used for general needs or temporary accommodation. However, in September 2018, the Council's Housing & New Homes Committee agreed the expansion of the scheme to allow the Council to look at purchasing affordable housing units secured under s106 agreements as part of new housing developments in schemes where there is a lack of interest from other affordable housing providers. The Council is now actively looking at acquisition opportunities.

v) Community Led Housing

8.12 The Council is working in partnership with the Brighton & Hove Community Land Trust which delivers the community led housing programme in the city. A pathway has been developed for Council owned sites to ensure there is clear route for considering when land or building opportunities may be suitable for community led housing, in line with the council's Corporate Plan commitment. At present five sites have been identified which could be used for community housing schemes. The Council is currently reviewing options for further sites.

B. Partnership working to accelerate delivery and unlock stalled sites

i) King Alfred/RNR site

8.13 The site is allocated in City Plan Part One for redevelopment involving the replacement of the existing indoor public sports facilities along with a minimum of 400 residential units and potentially other leisure uses. Following the withdrawal of the Council's preferred developer in August 2019, the Council has restated its commitment to delivering housing-led redevelopment on the site, but now considers that relocating the sports facilities elsewhere within the city will be necessary in order to bring forward a financially viable scheme. The process of establishing a new project began in early 2020 and includes consideration of alternative sites in the west of the city on which to deliver the sports centre. The delivery of housing will remain central to any future redevelopment proposals.

ii) One Public Estate

8.14 One Public Estate (OPE) is a Government funded programme which aims to make better use of public sector sites, cut running costs, and free up space for new homes and jobs while improving services to residents. OPE funding has been obtained for several projects in Brighton & Hove including:

- Hove Station Area – This is currently a mainly industrial area which is identified in the City Plan Part One for comprehensive mixed use redevelopment with a strategic allocation to deliver a minimum of 200 homes with retention/replacement of existing employment. The City Plan identifies potential for a minimum of 525 homes in the wider Hove Station area. The Council is preparing a masterplan in liaison with the relevant landowners and Hove Station Neighbourhood Forum which is intended to be adopted as a Supplementary Planning Document (SPD). Public consultation on the draft Masterplan/SPD will take place in early 2021, following which the SPD will be formally adopted by the Council. This will help bring forward coordinated development and ensure that the development potential of the area is achieved.

- Brighton General Hospital – Sussex Community NHS Foundation Trust is looking to consolidate their existing uses on the site which offers surplus public land with potential for comprehensive re-use and redevelopment. The site is proposed for allocation in the City Plan Part Two Proposed Submission for a minimum of 200 residential units, together with a health and care facility and community facilities. The Council is currently working with the NHS trust to bring forward a comprehensive scheme for the site.

- Moulsecoomb Neighbourhood Hub – This project aims to consolidate and improve a range of public services and facilities in the Moulsecoomb area, which will free up land to provide new low-cost housing. The area offers longer term potential to provide more than 200 affordable homes, which will be developed through the Council's New Homes for Neighbourhoods programme. The Council has undertaken early engagement with the local community through a series of 'Planning for Real' session held in January 2020 and is currently preparing detailed proposals leading towards submission of a planning application in late 2021 following further community engagement.

C. Improving communication with housing providers

i) Strategic Housing Partnership

8.15 The Strategic Housing Partnership is a sub-group within the Local Strategic Partnership (Brighton & Hove Connected) which brings together representatives of organisations with direct involvement or interest in addressing local housing needs (including the requirements of specific groups such as students, older persons, vulnerable and homeless people). The aim of the SHP is to improve housing, access to housing, and housing support to maintain the independence of vulnerable residents within the City. SHP members include Brighton & Hove Council, the Brighton and Hove Economic Partnership, Affordable Housing Partnership, and representatives of local planning professionals and local estate agents, landlords, the city's two universities, health providers etc. Meetings are held every two months.

8.16 The key objectives of the SHP are to:

- Provide leadership and vision to improve housing for all within the City;
- Co-ordinate cross tenure action to improve housing conditions and housing options;
- Influence policy and decision-making which maximises housing opportunities for all within the City and develop new policies where appropriate;
- Communicate with and secure participation of local communities;
- Support action to address the housing needs of vulnerable and socially excluded groups.

ii) Affordable Housing Delivery Partnership

8.17 The Affordable Housing Delivery Partnership brings together the Council's preferred partner Housing Associations which are the main Registered Providers operating in the city. The current preferred partners are signed up to the Brighton & Hove Housing Strategy and actively contribute to the Council's strategic housing objectives.

8.18 Meetings take place every three months and are attended by representatives of the preferred partner Housing Associations and Homes England, together with Council housing and planning officers. The meetings provide an opportunity to discuss progress in delivering new affordable housing and related planning policy and housing market issues.

iii) Planning Agents' Forum (PAF)

8.19 The Planning Agents' Forum (PAF) comprises planning agents who regularly submit planning applications to the City Council. PAF was established following the recommendations of a Planning Peer Challenge carried out in March 2016 and organised by the Local Government Association (LGA) with the Planning Advisory Service (PAS).

8.20 PAF is now recognised by the Council as a key mechanism for engaging with local planning agents. Regular meetings are held approximately every three months which are chaired by PAF and are attended by the Head of Planning and other senior officers. PAF also organises workshops with the Council. The Forum has provided a useful vehicle enabling the Council to obtain views and feedback from the local development industry, and to discuss issues of joint interest, including matters relating to improvement of the Council planning service.

8.21 As noted elsewhere in this document, the Council has used PAF to provide views from planning agents and developers on the constraints to housing delivery in Brighton & Hove and how these could potentially be addressed, including through Council actions.

D. Improving the performance of the Council Planning Service

i) Encourage pre-application enquiries and discussions

8.22 Pre-application discussion/advice enables potential planning issues relating to proposed development to be identified and addressed ahead of a planning application being submitted (covering issues such as policy compliance, design, development impacts etc). This improves application quality and reduces the time needed for the Council to determine the subsequent application. The Council provides pre-application advice on a fee charging basis. In 2019/20 a total of 273 requests for pre-application advice were received. However, the Council has identified a need to improve the timescales for delivery of pre-application advice. This forms part of the quarterly monitoring of Development Management performance and is reported to Planning Committee members.

ii) Use of Planning Performance Agreements (PPAs)

8.23 Planning Performance Agreements (PPAs) are agreements between the local planning authority and planning applicants that set timescales for pre-application advice, planning applications and the implementation of development. The Council encourages the use of PPAs, subject to financial charging based on an officer hourly rate to cover the cost of the service. PPAs set out officer resourcing and provide developers with agreed timescales, but do not influence the final decision on an application. The use of PPAs enables the Council to identify capacity and allocate resources to the planning application process in advance, which improves deliverability and timescales for determining the planning application.

8.24 In September 2018, committee approval was obtained for the introduction of a ‘fast track’ fee option for PPAs, based on the applicant/developer covering the cost of the additional resource, including hourly rates plus the council’s additional costs around IT, office accommodation and administration of the staff’s agency contract.

iii) Improve timescales for determining planning applications

8.25 The Council has been consistently in the top 25% of unitary councils in determining major applications within the target determination timescales (usually 13 weeks or other agreed time). It is these applications that have the most significant impact in terms of delivery of new housing.

8.26 The Council historically ranked in the lowest 25% of unitary councils for determining minor applications within the target determination timescales (usually 8 weeks or other agreed time), however performance has improved significantly and is now equal with that of Unitary comparators. The impact of small applications is less significant in terms of overall housing delivery, but the Council is steadily improving timescales for determining small applications through the corporate modernisation programme including use of better IT systems, streamlined procedures, smarter working, training, and development.

iv) Improve timescales for Section 106 agreements

8.27 For most major planning permissions in Brighton & Hove, s106 agreements are completed within three months of the Planning Committee resolution to permit. Council Committee reports include provisions which authorise the Head of Planning to refuse planning permission if s106 agreements are not completed within a 16-week period, which will be reduced to 12 weeks in future to further expedite development. The range and scope of matters covered in s106 agreements has been reduced by the introduction of CIL from 5 October 2020 and this will further reduce the timescales needed.

8.28 In general, the most complex and time-consuming elements of s106 agreements relate to affordable housing provision (particularly issues of phasing/trigger points and provision for any viability reviews). These are areas where there is limited scope to reduce Council requirements without compromising key objectives of the City Plan.

v) Improve timescales for discharge of planning conditions

8.29 The Council acknowledges that there are currently some specific issues affecting timescales for the discharge of planning conditions. These relate particularly to the timescales for the agreement of Construction Management Plans (CMPs), which can cause delays to commencement of development; and also agreement of Travel Plans which can delay the final occupation of built residential units. These issues have arisen mainly due to resourcing issues in the Council's sustainable transport service. The Council is looking to address these issues by recruiting more staff and through use of consultancy support.

E. Progressing work on the City Plan

i) Brighton & Hove City Plan Part Two

8.30 The City Plan Part Two (CPP2) will support accelerated housing delivery in three main ways:

- By assisting the implementation on the development strategy and strategic policies already set out in City Plan Part One (adopted in March 2016);
- By identifying and allocating additional sites for housing development; and
- By providing detailed development management policies to assist in the determination of planning applications, replacing the current retained policies from the 2005 Brighton & Hove Local Plan.

8.31 The Council's work on CPP2 has included assessment of all sites identified in the SHLAA to determine if they are suitable for allocation for housing and/or mixed uses (including housing). Following this analysis, the majority of SHLAA sites which do not already have planning permission (or where permissions have not yet commenced) have been proposed for allocation in CPP2 and many of these sites are already coming forward through planning applications.

8.32 The draft CPP2 was published for Regulation 18 consultation in Summer 2018, after which further work was undertaken to amend the draft policies, including seeking further evidence on a range of matters (including issues related to housing delivery). The Proposed Submission version of CPP2 was agreed by the Council on 23 April 2020 and published for consultation over an 8-week period from 7 September to 30 October 2020 (the consultation period having been delayed for several months due to the COVID-19 restrictions). It is intended that the Proposed Submission Plan will be submitted for examination in Spring 2021.

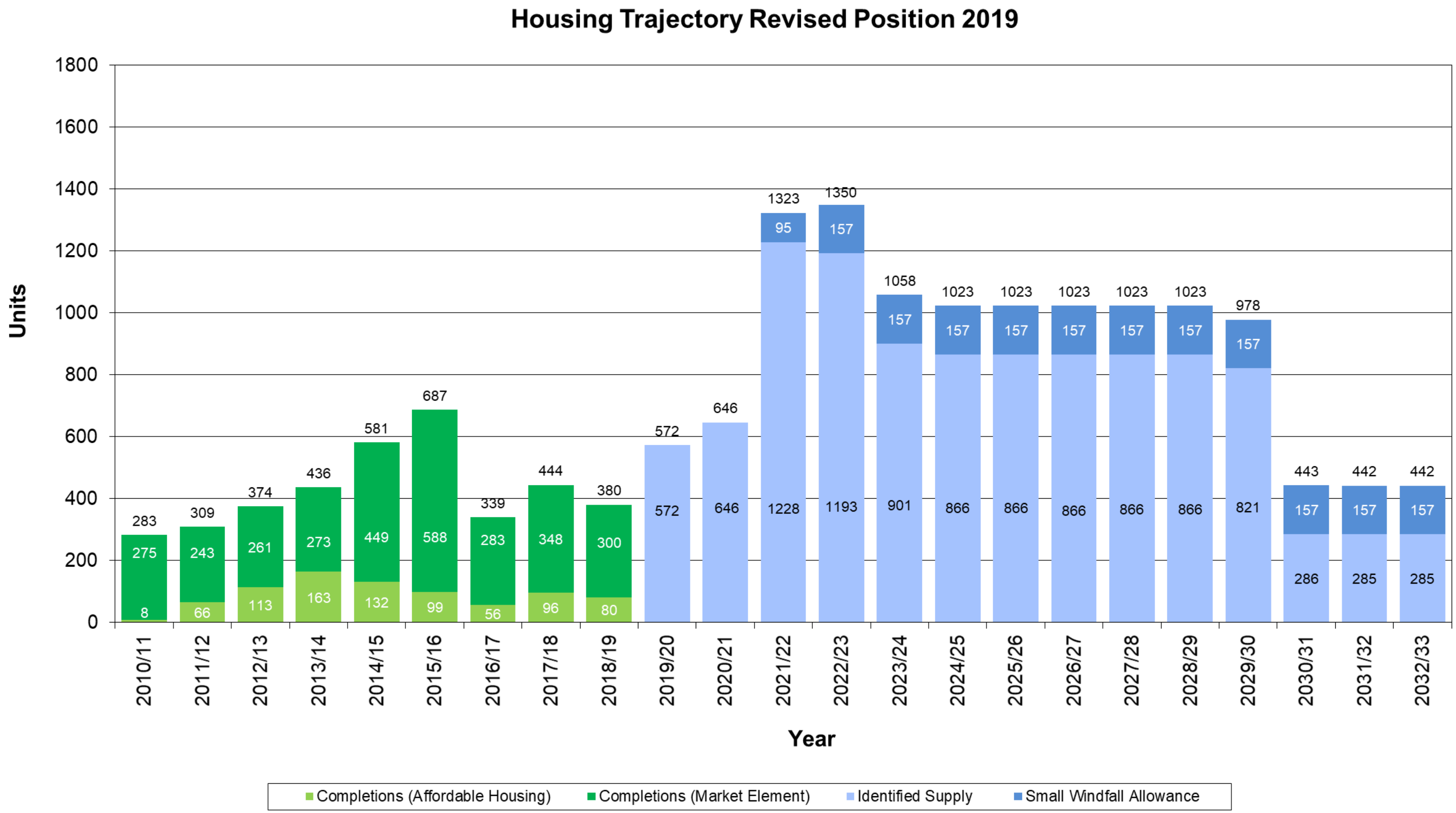
ii) City Plan Review

8.33 This is a longer term objective that will follow the adoption of City Plan Part Two. The Council is currently undertaking initial assessment of the scope of the Review which is intended to be reported to the Tourism, Equalities, Communities & Culture (TECC) Committee in March 2021.

9. Management and Monitoring

9.1 The HDAP is a publicly accessible document which links to the SHLAA and AMR. It is intended to monitor and update the Action Plan on an annual basis in response to the publication of updated Housing Delivery Test (HDT) figures. In addition, many of the actions listed in the Action Plan reflect priorities, actions and targets set out in other Council documents such as the Housing Strategy and Economic Development Strategy and will be monitored in connection with those documents.

Appendix 1: Current housing trajectory in the SHLAA 2019 Update



Appendix 2: Residential developments of 10+ dwellings gaining planning permission 2018/19

Site address	Description of development	Net units
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	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	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

Source: (AMR 2018/19)

Appendix 3: Major residential developments (6+ dwellings) under construction (2019 SHLAA)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total
Preston Barracks, Lewes Road, Brighton	0	0	180	183	0	363
Land at Brighton Marina (Outer Harbour)	0	0	0	122	122	244
Circus Street, Brighton	142	0	0	0	0	142
Westerman Complex, School Road, Hove	0	41	63	0	0	104*
The Astoria, 10-14 Gloucester Place, Brighton	0	70	0	0	0	70
Court Farm House, King George VI Avenue, Hove	0	0	69	0	0	69*
Texaco Service Station, 133 Kingsway Hove	58	0	0	0	0	58
9-16 Aldrington Basin/Land South of Kingsway	0	0	52	0	0	52*
Saunders Glassworks, Sussex Place, Brighton	0	0	0	0	49	49*
Fmr Brewery site, South St, Portslade (Mersen)	11	37	0	0	0	48
Lansdowne Place Hotel, Lansdowne Place, Hove	45	0	0	0	0	45
Whitehawk Clinic, Whitehawk Road, Brighton	0	38	0	0	0	38
76-79 & 80 Buckingham Road, Brighton	0	34	0	0	0	34
The Downsman, 189 Hangleton Way, Hove	0	33	0	0	0	33
Selsfield Drive Housing Office, Brighton (HRA)	0	30	0	0	0	30
251-253 Preston Road, Brighton	28	0	0	0	0	28
Baptist Tabernacle, Montpelier Place	24	0	0	0	0	24
The Coach House, 1-6 Lions Gdns, Withdean Ave	0	19	0	0	0	19
Hanningtons Lane, North Street & Brighton Sq	12	0	0	0	0	12
51-53 Church Road, Hove	12	0	0	0	0	12
27-31 Church Street, Brighton	0	0	0	0	10	10
Rayford House, School Road, Hove	0	9	0	0	0	9
48-50 Western Road, Brighton	9	0	0	0	0	9
Former St Gabriel's Home, 18 Wellington Road	9	0	0	0	0	9
61-62 Western Road, Brighton (HMV)	9	0	0	0	0	9
Blocks E & F Kingsmere, London Road	0	8	0	0	0	8
46 Freehold Terrace Brighton (HRA)	8	0	0	0	0	8
Blocks A & B, Kingsmere, London Road	0	8	0	0	0	8
25-28 Elder Place, Brighton	7	0	0	0	0	7
27 Palmeira Avenue, Hove	6	0	0	0	0	6
187 Lewes Road, Brighton	0	6	0	0	0	6
17 Bampfield Street, Portslade	6	0	0	0	0	6
Blocks A, B, & C Belvedere, 152-158 Dyke Road	0	4	0	0	0	4
TOTAL	**386**	**337**	**364**	**305**	**181**	**1,573**

* Technical start involving demolition of existing buildings.

Appendix 4: Planning/Development progress on sites since the SHLAA Update 2019

Major residential developments (6+ dwellings) with outline planning permission (2019 SHLAA)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Progress since 2019 SHLAA
Land adjacent to Ovingdean Road	0	0	22	23	0	45	Applications submitted relating to planning conditions attached to Outline permission
Land at Coombe Farm, Saltdean	0	0	30	30	0	60	Detailed planning application for revised scheme for 72 dwellings submitted Jan 2020
10 Shirley Drive, Hove	0	0	9	0	0	9	Reserved Matters approved, March 2020
TOTAL	**0**	**0**	**61**	**53**	**0**	**114**	

Major residential developments (6+ dwellings) with detailed planning permission not yet commenced (2019 SHLAA)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Progress since 2019 SHLAA
Edward St (Amex House)	0	56	56	56	0	168	Commenced
UF Sites 4b, 5, 5a Land Off Overdown Rise And Mile Oak Road Portslade	0	0	60	65	0	125	Commenced
Anston House, Preston Road (EM2)	0	0	0	100	129	229	Developer now looking to develop as build to rent housing. Applications to discharge pre-commence conditions submitted.
Conway Street (EM1)	0	0	0	0	200	200	Permission granted for revised mixed use development inc 216 build to rent units, Oct 2020
87 Preston Road (EM2)	0	25	0	0	0	25	Commenced
Peacock Industrial Estate, Lyon Close, Hove	0	0	75	77	0	152	Not started (includes 2 live/work units making 154 housing units in total)
Longley Industrial Estate, New England Street	0	0	0	100	101	201	Commenced
Land at 189 Kingsway, Hove (Sackville Hotel)	0	0	60	0	0	60	Commenced (Variation of conditions has reduced development to 52 units, June 2020)
UF Site 50 Land West of Falmer Avenue	0	0	32	0	0	32	Commenced (net residential gain is 31 units)
Buckley Close garage site, Hangleton	0	12	0	0	0	12	Complete 2019/20
113-119 Davigdor Road, Hove	0	0	52	0	0	52	Not started
Kings House, Grand Avenue, Hove	0	0	0	85	84	169	Commenced
St Aubyns School 76 High Street,Rottingdean	0	0	46	47	0	93	Commenced (net residential gain is 90 units)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Progress since 2019 SHLAA
Preston Park Hotel, 216 Preston Road, Brighton	0	0	22	0	0	22	Not started
Hove Business Centre, Fonthill Road, Hove	0	9	0	0	0	9	Planning permission lapsed
65 Orchard Gardens, Hove	0	0	23	0	0	23	Not started. Application for discharge of pre-commencement conditions registered
29 - 31 New Church Road, Hove	0	0	45	0	0	45	Commenced
204 Old Shoreham Road, Portslade	0	0	8	0	0	8	Commenced
12 Lyndhurst Road, Hove	0	6	0	0	0	6	Planning permission lapsed
21a-21b Bedford Place, Brighton	0	7	0	0	0	7	Not started
Clermont Church, Clermont Terrace	0	6	0	0	0	6	Not started
10 Wilbury Road, Hove	0	0	9	0	0	9	Not started
Land To The East Of The Vale, Brighton	0	0	6	0	0	6	Not started
St Georges House, 34-36 St Georges Road	0	0	6	0	0	6	Commenced
25 Preston Park Avenue	0	0	7	0	0	7	Not started. Application for amended scheme submitted
Shermond House, 58 - 59 Boundary Road	0	0	10	0	0	10	Not started
108 North Street, Portslade	0	0	6	0	0	6	Prior Approval commenced
TOTAL	**0**	**121**	**523**	**530**	**514**	**1,688**	

Planning applications (6+ dwellings) approved subject to s106 agreement (2019 SHLAA)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Progress since 2019 SHLAA
Land to north east of Coldean Lane	0	0	100	142	0	242	Permission granted Mar 2020. Site cleared
Belgrave Centre, Clarendon Place, Portslade	0	0	0	104	0	104	Permission granted Apr 2020.
Former Housing Office (George Cooper House) 21-22 Oxford Street Brighton	0	10	0	0	0	10	Permission granted Sept 2019. Commenced
TOTAL	**0**	**10**	**100**	**246**	**0**	**356**	

Planning applications (6+ dwellings) under consideration (2019 SHLAA)

Site address	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Progress since 2019 SHLAA
35-39 The Droveway Hove (Dairycrest)	0	0	14	0	0	14	Permission granted on appeal Oct 2019. Planning application for revised scheme inc 25 dwellings under consideration.
Toads' Hole Valley King George VI Avenue Hove	0	0	0	0	100	100	Outline application for development inc up to 880 dwellings still under consideration.
25 York Villas, Brighton	0	0	0	7	0	7	Permission granted Sept 2020.
TOTAL	**0**	**0**	**14**	**7**	**100**	**121**	

Appendix 5: Further major residential developments (6+ dwellings) gaining planning permission or Planning Committee approval since the 2019 SHLAA

Site address	Net units	Comments
Greater Brighton Met College, Pelham Street	135	Hybrid application inc outline permission for 135 residential units granted, Mar 2019. RM application, Feb 2020
39 & 41 Whitehawk Way, Brighton	6	Planning permission for 6 residential units with provision of care (C3b), Sept 2019. Complete
34 Preston Park Avenue, Brighton	6	Planning permission granted, Feb 2020. Commenced
Ditchling Court, 136 Ditchling Road	7	Planning permission granted, Feb 2020. Not started
13-14 Sheridan Terrace, Hove	9	Planning permission allowed on appeal, June 2020
Sussex County Cricket Ground, Eaton Road, Hove	36	Planning permission granted, Aug 2020
Sackville Trading Estate / Coal Yard, Sackville Road	564	Planning permission granted, Aug 2020. Development also includes 260 unit care community.
19-24 Melbourne Street, Brighton	46*	Planning permission granted for 83 co-living residential units*, Sept 2020
Housing Office Victoria Road Portslade (adj Portslade Town Hall) (HRA)	42	Planning permission granted, Sept 2020
KAP Ltd, Newtown Road, Hove	148	Planning permission granted, Sept 2020
P&H House, 106-112, Davigdor Road, Hove	7	Planning permission granted for 7 flats, Sept 2020 (additional to 78 flats already granted Prior Approval)
Eastergate Road Garage Site (HRA)	30	Planning permission granted for 30 transitional housing apartments, Oct 2020
Hill House, 53 Western Road, Hove	8	Planning permission granted, Oct 2020
55 Goldstone Crescent, Hove	6	Planning permission granted, Oct 2020
57 Goldstone Crescent, Hove	6	Planning permission granted, Oct 2020
TOTAL	**1,056**	

* Recorded as equivalent to 46 self-contained residential units for housing monitoring purposes.

Appendix 6: Planning Agents Forum Questionnaire (June 2019)

Views on housing delivery in Brighton & Hove

Brighton & Hove City Council is preparing a Housing Delivery Action Plan (HDAP) to provide a better understanding of current housing delivery in the city, to identify barriers and constraints to delivery, and to consider potential actions to increase delivery in the future.

This questionnaire is circulated through the Planning Agents Forum (PAF) and is intended to gain views from a cross-section of agents on the main issues that may be slowing down housing delivery in the city. It is intended to have a more general discussion about housing delivery issues at the PAF meeting on 16 July.

Name:		**Date:**	
Position:			
Organisation:			

Questions			
1. Please provide a very quick general summary of your current involvement with promoting housing development in Brighton & Hove (e.g number of sites, size and type of development(s) etc)			
2. To what extent do you consider that the following issues are significant barriers slowing down housing development in the city:	***Please indicate how significant you consider each factor in slowing down housing delivery***		
	Very important	**Quite important**	**Not important**
a) General lack of sites	☐	☐	☐
b) Complexity of development sites	☐	☐	☐
c) Economic/housing market uncertainty	☐	☐	☐
d) Issues of development viability	☐	☐	☐

e) Affordable housing requirements	☐	☐	☐
f) S106 negotiations	☐	☐	☐
g) Pre-commencement conditions	☐	☐	☐
h) Infrastructure/utilities provision	☐	☐	☐
i) Other issues (please specify)	☐	☐	☐

Please provide any additional comments or views on the issues above.

3. Are there specific actions that the Council might consider to help speed up the planning process / housing delivery? Please provide details.

4. Please provide any other comments relating to housing delivery issues.

Analysis of responses received

Respondents to questionnaire

ABIR Architects
Brighton & Hove Community Land Trust
Crowther Associates Architects LLP
Ian Lerner & Co
Kim Strasman Associates
LCE Architects
Lewis & Co Planning
RH Partnership Architects
Whaleback Ltd

Barriers to housing delivery

	Very important	Quite important	Not important
j) General lack of sites	5	2	2
k) Complexity of development sites	3	6	
l) Economic/housing market uncertainty	2	7	
m) Issues of development viability	5	3	1
n) Affordable housing requirements	5	4	
o) S106 negotiations	7	1	1
p) Pre-commencement conditions	4	3	2
q) Infrastructure/utilities provision	1	6	2
r) Other issues (please specify)	3	1	

Comments received

<u>Additional comments</u>

- Too much hassle developing in B&H
- AH and CIL thresholds too low - development in B&H already expensive
- Slow planning process
- Hard to compete with conventional profit-led development (B&HCLT)
- Viability assessments – inconsistency in advice & valuations for similar sites across city which makes initial viability hard to value prior to planning
- Council planners should be more proactive/engage at early stage with architects & developers concerning design, proposed uses and economic viability
- Need to take more account of market conditions/trends/future demand
- Forthcoming CIL will determine how small developers seek sites
- Most small developers consider AH and local infrastructure requirements as too onerous –

regard this as a government/LA tax which shouldn't be their responsibility
- Excessive requirements for AH/infrastructure also impact on quality of housing schemes built
- Potential to increase housing densities – Council too cautious

Possible Council actions

- More proactive approach to encourage development
- Respond to pre-apps more quickly – delays discourage developers using this route
- Determine planning applications more quickly
- Discharge planning conditions more quickly
- Apply more flexibility in use of minimum floorspace standards
- Delays in receiving consultee responses – if consultees do not meet deadlines, council should determine applications on basis of no objections
- Lack of direct access to consultees to discuss issues raised
- Council planners should be more proactive/engage at early stage with architects & developers concerning design, proposed uses and economic viability
- Need to take more account of market conditions/trends/future demand
- Relax CIL and affordable housing requirements
- Increase AH threshold to 10+ dwellings in line with NPPF
- Encourage & publicise local RSLs & scrutinise how they operate
- Reduce number of planning conditions imposed (usually more than appeal planning inspectors impose)
- Discharge planning conditions within 8 weeks
- Improve resourcing of Council planning department to address delays in determining applications (and responding to pre-app requests)
- Better project management to planning & delivery of housing – ensure PPA timetables adhered to
- Consider out-sourcing small/simple applications to speed up
- Relax validation requirements
- Adopt more relaxed attitude to off-site affordable housing
- Allow more flexibility with regard to use classes (citing employment & retail developments)
- Lobby central Government to improve housing policies

Any other comments

- Issues with affordable housing/DV process
- RSLs not interested in delivering small numbers of AH units onsite – offsite contributions would be better
- Threshold for AH contributions (5+ dwellings) does not follow current NPPF guidance on AH threshold (+10 dwellings)

Brighton & Hove City Council