



**Brighton & Hove
City Council**

**Proposed Submission City Plan Part 2
Brighton & Hove Development Plan April
2020**

Hearing Session: 9 November 2021 (PM)

**Statement in Response to Matter 8:
Site allocations for purpose built student
accommodation (PBSA) (H3)**

**BY
BRIGHTON & HOVE CITY COUNCIL**

List of Abbreviations

CPP1 - City Plan Part 1
CPP2 – City Plan Part 2
NPPF - National Planning Policy Framework
PBSA – Purpose Built Student Accommodation
SA - Sustainability Appraisal

Whether the proposed PBSA allocations are soundly based

Issue 1 Lewes Road Bus Garage, Lewes Road (250 bedspaces)

Issue 2 118-132 London Road (232 bedspaces)

Issue 3 45 & 47 Hollingdean Road (40 bedspaces)

Q1. What is the context provided by the City Plan Part 1 for PBSA?

1. CPP1 does not set out any specific outstanding policy matters relating to PBSA to be addressed by CPP2. Policy CP21 in CPP1 relates to PBSA and sets out criteria to be used in the determination of relevant planning applications. It also includes five site allocations for PBSA development, four of which have since been delivered.
2. In recognition of the demand for this form of accommodation (see Q2 below) and the continued interest shown by developers through the submission of speculative applications on unallocated sites, it is considered appropriate to propose additional site allocations in CPP2 Policy H3.

Q2. What is the identified need for PBSA? How has this been calculated and is it based on robust evidence? What contribution to that need would the proposed allocations make?

3. The proportion of full-time students that can currently be accommodated in PBSA is estimated to be approximately 45% as shown in ED03 Student Accommodation Study, Figure 10. This has been calculated by comparing the number of bedspaces in operational PBSA developments to the number of full-time students requiring accommodation¹ studying at the universities of Sussex and Brighton (based on projections supplied by the universities). The remainder of this cohort of students are assumed to be accommodated in the wider housing sector, either within Brighton & Hove or in neighbouring areas.
4. There is no quantitative figure of the 'need' for PBSA. As the number of students in the city is expected to remain fairly stable over the remaining plan period², there is not an increasing student population with requirements for additional accommodation. The concept of 'need' in this instance is better described as 'demand' since the cohort of students is accommodated in some form at present, and the demand relates from a desire of a proportion of the student population to reside in an alternative form of accommodation (i.e. PBSA rather than housing in the general housing stock, be that HMOs or C3 housing). It is not expected that all students would ever be accommodated in PBSA due to the number of students in the city and the preference of a proportion of the student population to live in accommodation in the general housing sector.

¹ It is estimated that 80% of full-time students require specific term-time accommodation.

² See para. 4.5, ED03 Student Accommodation Study

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5. CPP1 does not set an artificial 'need' figure by means of a target for higher provision of PBSA. However, the proportion of students accommodated in PBSA remains significantly below the number of students requiring accommodation and there is therefore considered to be unmet demand for additional PBSA developments. The council supports the provision of PBSA through criteria-based policies CP21 and DM8, site allocations in CP21 and additional proposed site allocations in Policy H3.
6. The proposed allocations will make a contribution towards meeting the demand for accommodation as part of an overall trend of increasing PBSA provision, as illustrated in Figure 7 of document ED03.

The Council is requested to address the following questions for each of the proposed allocations. For those sites where reps have been made, the Council should respond to the particular issue(s) raised. In doing this any updated information regarding the planning and development status of the sites should be included.

Q1. Are the allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

7. The approach to site allocations was subjected to sustainability appraisal and was considered the most appropriate option of the three reasonable alternatives assessed. The appraisal is set out in SD05a Sustainability Appraisal, page 100.
8. A number of locations/sites were put forward for new PBSA as part of the CPP2 'call for sites' exercise in 2016, as set out in TP07 Table 11. The limited number of sites suggested reflects the difficulty in accommodating significant new PBSA developments within the city's administrative boundaries.
9. The Lewes Road Bus Garage is the only site put forward³ that was considered available and suitable for PBSA development following a detailed site appraisal (TP07, Appendix 5).
10. The sites at Hollingdean Road and London Road were identified as suitable for allocation after planning applications were submitted. Potential constraints and adverse impacts were considered in detail during the determination of the respective planning applications, and separate site appraisals were also undertaken prior to the sites being included in CPP2. The site appraisals for all three sites are set out in TP07, Appendix 5.
11. Development at 118-132 London Road is now largely complete and due to be occupied from September 2021. A main modification (MM110, BHCC02 Revised Schedule of Modifications) has therefore been proposed to delete


³ see representation in CD22a Statement of Consultation for City Plan Part 2 Scoping Stage Consultation, page 625

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the site from Policy H3 and this site will not be addressed in the further questions below. BHCC05 (CPP2 Site Allocations update table) provides an update on the planning and development status of the strategic site allocations.

Q2. Are the site boundaries appropriate? Is there any justification for amending the boundaries? Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

12. The council is the freeholder of the Lewes Road Bus Garage site. The site boundary is appropriate and reflects the area of the Council’s ownership.
13. To improve the effectiveness of the policy, it is proposed to modify the site boundaries and name of the Hollingdean Road site allocation to reflect those of a consented scheme (BH2019/03700).

MM ##	Policy H3 page 186	Policy H3 Purpose Built Student Accommodation <i>Amend Table 9 to read</i>		To reflect an extant planning permission (BH2019/03700)
		Site Name	Indicative number of bedspaces	
		45 & 47 39-47 Hollingdean Road, Brighton	40 99	
Map ##	Policy H3	Policy H3 – Purpose Built Student Accommodation <i>Amend the site boundary of the site in Hollingdean Road as follows:</i> <i>Site allocation before boundary amendment:</i> 		To reflect an extant planning permission (BH2019/03700)
<i>Site allocation after boundary amendment:</i>				



Q3. Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

14. The planning consent already granted for the 39-47 Hollingdean Road site provides evidence of the site's viability and deliverability.
15. The Council is in discussions with the leaseholder of Lewes Road Bus Garage with a view to progressing a viable PBSA scheme which will maintain the operational requirements of the bus garage.

Q4. How were the site capacities determined? What assumptions have been made? Are these justified? What is the expected timescale and rate of development and is it realistic?

16. For Hollingdean Road, the indicative bedspace number was based on consideration of the reasons for refusal of a previous application for development of the site, which included size and massing (BH2017/01873). However, as noted above, to make the policy effective it is proposed to alter the indicative number to reflect the extant scheme which benefits from a slightly larger development site. It is expected that this development will be delivered early in the plan period.
17. Lewes Road Bus Garage is a large site. The indicative figure of 250 bedspaces is considered to be a realistic capacity based on early consideration of potential scale and massing options, taking into account the site constraints, notably the need to retain an operational bus garage and the close proximity of residential dwellings, particularly to the east of the site on Riley Road. It assumes that some units can be accommodated above a rebuilt garage roof. It is expected that the site will be delivered in the period 2023-25.

Q5. What benefits would the proposed development bring? What are the potential adverse impacts of developing the site and how might they be mitigated?

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18. The SA (SD05a, page 101) concluded that the policy could have significant positive effects for the housing and transport sustainability objectives. The proposed developments will contribute towards meeting the unmet demand for PBSA accommodation in the city. Given that the overall number of students in the city is not expected to increase significantly, it is expected that the proposed developments, together with other PBSA schemes that are in the pipeline, will reduce pressure on the general housing market from the student sector. This could potentially release some student-occupied housing back into the general housing market and would support sustainable, balanced communities.
19. No significant adverse impacts were identified through the SA. Potential adverse amenity impacts of developing the sites can be mitigated during consideration of detailed design issues at the planning application stage.

Q6. Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Do they adequately address all issues/concerns in relation to each site?

20. The requirement for the operational requirements of the bus depot to be maintained is necessary for the policy to be effective and justified, as the negative effect on the operations of the bus company through displacement of the depot would significantly adversely affect their operations in the city⁴.

Q7. Would the Modifications proposed by the Council address any shortcomings, particularly in respect of Ground Water Source Protection Zones?

21. Yes, the Council's proposed modification MM113 (BHCC02) would address the request from the Environment Agency for acknowledgement that these sites fall within Groundwater Source Protection Zones.

⁴ Representation from Go-Ahead Group to Reg. 18 consultation on the Draft City Plan Part Two. See page 359, document CD18b – Summary of Key Issues Arising from Representations