

Appendix 4 – City Plan Part 2 Background Study Summaries

1. Gypsy and Traveller Accommodation Assessment – 2019 Update

The 2019 Gypsy and Traveller Accommodation Assessment (GTAA) provides a robust assessment of the current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Brighton & Hove, including the area that falls within the South Downs National Park. A GTAA was previously produced in 2014 and an update was required to reflect the following factors:

- The time elapsed since the research for the previous study was undertaken;
- The new definition of traveller as set out in the Government’s Planning Policy for Gypsies and Travellers 2016 (the key change is that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA);
- The delivery and opening of the site at St. Michael’s Way, Horsdean which provides 12 permanent pitches; and
- Changing patterns of unauthorised encampments in the city.

The assessment covers the administrative area of Brighton & Hove including that part located within the South Downs National Park Authority area. This approach reflects City Plan Part One Policy CP22 Traveller Accommodation which includes provision for an updated target to be identified through a revised assessment of traveller accommodation needs, and further states that the Council will review traveller accommodation needs to cover the full plan period to 2030. The revised assessment of need is set out below:

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

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

The allocation of the identified pitch requirements for travellers who meet the planning definition to the SDNP Local Planning Authority (LPA) area stems largely from the geographical location of the Horsdean site (within the National Park) which is within the Brighton & Hove administrative area. As a result both LPAs will continue to work constructively and jointly to address the need for new permanent pitches that has been identified in the updated GTAA.

A joint site search exercise undertaken by BHCC and the SDNPA in 2016-17 did not identify any suitable and available sites. A Duty to Cooperate process has therefore been undertaken with neighbouring authorities to ascertain whether and to what extent they were able to provide additional pitches to assist in meeting any of the unmet need. No neighbouring authorities have currently indicated any ability to assist in meeting the unmet need.

2. Student Accommodation Study

This Technical Paper examines the relationship between supply and demand for Purpose Built Student Accommodation (PBSA) and the consequent demand for general private sector housing from students over the period to 2030. A brief summary of key findings is set out below.

Demand – University student numbers have increased significantly over recent years, with the number of full-time students requiring accommodation (80% of the total full time population) estimated to increase from 23,525 in 2016/17 to 25,780 in 2019/20. However neither University has indicated they have any plans to expand further after 2020. **Supply** - The supply of permitted PBSA has increased rapidly in recent years and this is forecast to continue as recently permitted developments are delivered (see Figure 1 below).

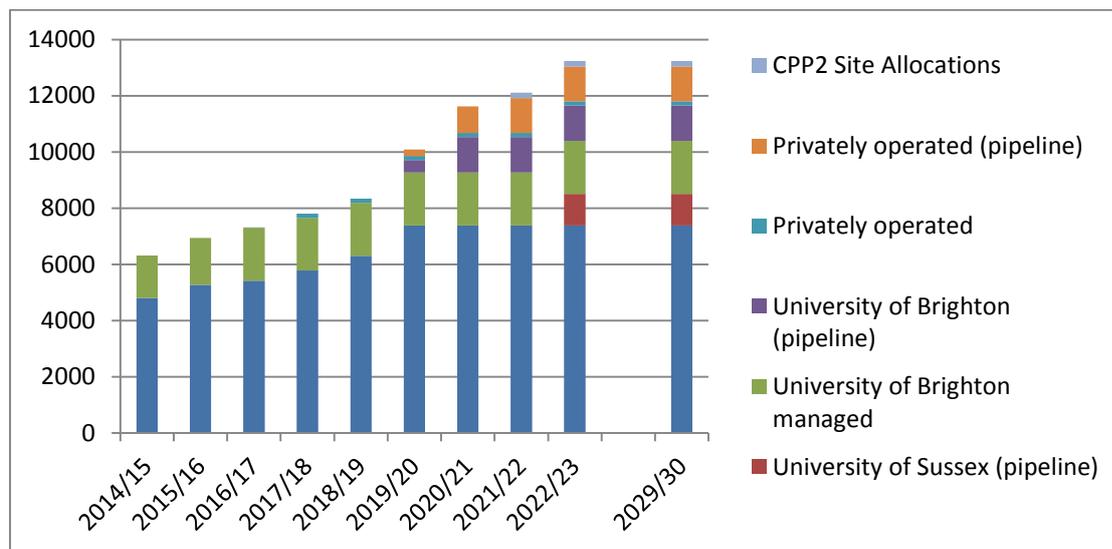


Figure 1: Total PBSA bedspaces 2015-2030

The increases in PBSA provision that are expected are likely to mean that the proportion of university students requiring accommodation being housed in PBSA could rise from approximately 33% in 2016/17 to over 50% in 2022/23. This could lead to a reduction of approximately 3,000 students requiring alternative accommodation elsewhere in the private rented sector. This forecast reduction is illustrated in Figure 2 below.

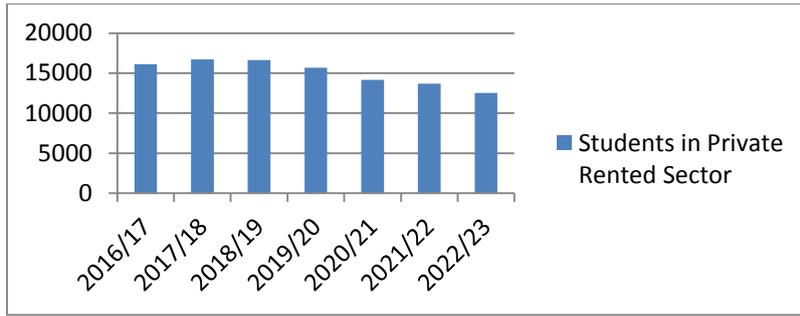


Figure 2: Number of Students Living in the Private Rented Sector by year

3. Older Person Housing Needs Assessment 2019

This study was commissioned jointly by the council’s Planning, Housing, and Commissioning services to assess the need for different types of specialist housing and related support for older people in the city. The study recommendations have informed the planning policy for specialist older persons’ accommodation in City Plan Part Two (Policy DM4), and will also support the future strategic planning of the council’s specialist housing and support services.

Overall the study concludes that there needs to be a wider mix of housing/accommodation options for older people. This includes supporting people to live longer in their own homes, whilst making provision for a range of purpose-built housing types and tenures to enable ‘downsizing’/ ‘rightsizing’ and support moving in later life as a positive choice.

Taking account of existing provision in the city, the study includes projections of the need for specialist housing and accommodation for older people. For the period to 2030, the analysis indicates:

- significant future demand for housing for older people, comprising both sheltered housing to rent and private sector retirement housing for sale (649 units);
- some identified demand for housing with care (i.e extra care/assisted living) both for sale and rent (227 units); and
- an expected decline in demand for traditional residential care (-37 beds), but an increase in the use of nursing care due to an increasing population of older people with complex care needs (246 beds).

(Note that these figures do not include allowance for the replacement of existing specialist housing/accommodation that may be out-dated and no longer suitable to meet current needs.)

The study recommends planning for a mix of housing and care models, including:

- ‘Care ready’ housing for rent and for sale, i.e. without care on-site, but designed to enable people to age in place, to allow for decreased mobility and permit individuals to be cared for easily in their own homes if required. This should include a mix of age-designated and inter-generational care-ready housing.
- Housing with care options that will enable the use of residential care homes to decrease, including extra care housing for rent and for sale with onsite domiciliary care services. Such developments should provide a ‘balanced’ community, i.e. having residents with a mix of care needs. Housing with care schemes would typically provide a minimum of 60/70 units, but there is potential within the city to support a larger scheme of 150+ units of mixed tenure with a wide range of facilities including onsite domiciliary care.
- Specialised housing for older people that will cater for growing number of people living with dementia and complex care needs, including hybrid housing and nursing care models that can cater for people living with dementia and other complex care needs to end of life.

The report emphasises the need to deliver high quality housing based on the good practice design principles set out in the ‘Housing our Ageing Population: Panel for Innovation’ Report (2009) and subsequent HAPPI reports. It also highlights that the affordability of housing/accommodation is a key issue for many older people and there is a need to ensure appropriate adequate provision for affordable accommodation for older people.

4. Build to Rent Study 2019

The purpose of the study was to undertake an assessment of Build to Rent (BTR) in the city and its likely viability in terms of delivery. The study provides information to inform and support policy development for BTR in City Plan Part Two (Policy DM6), which looks to provide more choice of good quality rented accommodation, and contribute towards meeting identified housing needs in the city.

BTR has been identified as a distinct category of housing in the National Planning Policy Framework (NPPF) and the Government has published detailed Planning Policy Guidance (PPG) to guide its development. The economics of BTR developments differ from build for sale as it is financed by long-term investment (e.g by a pension fund or similar). All homes in a scheme remain in the same ownership and are managed as one investment, usually without the involvement of a Registered Provider of affordable housing (e.g. housing association).

The BTR study tested a range of scenarios regarding percentages of affordable housing and levels of discount compared to market rents, whilst factoring in other variables such as location within the city, development size (number of residential units), existing land use values and other potential developer contributions (including the council’s proposed CIL

charging rates). The viability appraisals tested different levels of affordable rented units to show their impact on viability generally and on the number of affordable units that can potentially be delivered as part of a BTR scheme.

The study findings demonstrate that, subject to the variables tested, BTR schemes in the city are capable of supporting up to 20% affordable units provided at discounted rents of at least 20% below equivalent local market rents. The study demonstrates that greater levels of discount would be required to deliver units that are more genuinely affordable for most of those eligible to join the Council's housing register. Therefore in negotiating the affordable element of BTR, the council should consider the trade-off between the number of affordable units to be provided and the level of affordable discount that may be achieved.

In addition, the study made several other recommendations, including that the Council should use S106 agreements to secure requirements for the long term retention and management of the BTR units. The S106 agreements should include:

- Requirements for eligibility criteria against which applicants for the affordable units will be assessed;
- Provision to secure the affordable units provided as part of the BTR in perpetuity (including provision to recoup the value of the affordable units if sold);
- Using a legal covenant to require that the units are held as BTR tenure for at least 15 years (with provisions for clawback in the event that any or all BTR units are sold within this period);
- Specification that rents should be inclusive of all service charges.

5. Strategic Housing Land Availability Assessment (SHLAA 2019)

The Strategic Housing Land Availability Assessment (SHLAA) is updated annually to take account of the latest annual residential development monitoring and any further technical work regarding development site capacity and viability.

The SHLAA site and summary schedules set out net housing completions and projected housing supply over the City Plan period 2010–2030. The schedules also analyse delivery within the eight Development Areas (DA1 – DA8) identified in the adopted City Plan Part One (CPP1) and across the Rest of the city (including the urban fringe sites). The SHLAA includes a housing trajectory and sets out the five year housing land supply against the housing provision target set out in adopted CPP1 Policy CP1 Housing Delivery.

The SHLAA 2019 Update identifies a total potential housing supply of 17,243 net dwellings. The projected housing supply over the City Plan period (2010-2030) is 14,875 net dwellings.

However, the rate of housing delivery remains well below the City Plan requirement. A total of 3,833 net dwellings have been completed over the period 2010-2019, which averages only 426 dwellings per year compared to the City Plan target of 660 dwellings per year.

The city's five year housing land supply is assessed at 4,949 net dwellings. When compared to the five year requirement in the City Plan (adjusted to take account of the delivery shortfall from previous years), there is a shortfall of 1,200 dwellings (equivalent to 4.0 years of housing supply). A Housing Delivery Action Plan (August 2019) has been prepared to address this issue and is available on the council's website.⁶

6. Brighton and Hove City Council Level 1 and 2 Strategic Flood Risk Assessments, JBA Consulting October 2018.

The Level 1 and 2 Strategic Flood Risk Assessment (SFRA) was commissioned to provide a comprehensive evidence base to support the Brighton and Hove City Plan Part Two (CPP2). This updated SFRA replaces the 2012 SFRA which provided the evidence base for the adopted City Plan Part One.

The key objectives of the review were:

1. To take into account the latest flood risk policy
2. Take into account the latest flood risk information and available data including more detailed groundwater vulnerability mapping and surface water flood mapping which takes climate change into account.
3. To provide individual flood risk analysis for sites identified in the draft CPP2
4. To provide a comprehensive set of maps displaying flood risk information.

An overarching aim of the screening was to put flood risk management policy and practice in place to provide for a strategic approach to the management of surface water flood risk as this is a priority to address the needs of adaptation to climate change effects. The findings and recommendations of the SFRA informed the site selection process for the draft CPP2 and the drafting of Policy DM43 Sustainable Urban Drainage.

Surface Water Flood Zones have been introduced in the SFRA in order to define areas potentially at risk from surface water flooding to provide more strategic consideration of surface water flood risk in the land allocation and planning process.

The SFRA has identified that some areas of Brighton and Hove are at high risk of flooding from surface water, groundwater and tidal sources. Therefore, proposed development sites at such locations will be required to satisfy the Sequential and, where necessary, Exception Tests in accordance with the NPPF¹. The presence of extensive surface water risk zones introduces a requirement to demonstrate that proposed development is safe from surface water flood risk for over the intended life.

An updated Sequential and Exception Test has been prepared to support the CPP2 and this is published as technical topic paper. The aim of the sequential test is to as far as reasonably possible, steer new development to areas with the lowest risk of flooding taking into account of climate change and the vulnerability of future uses to flood risk. Where it was not possible to find enough land for CPP2 allocations at locations outside of flood risk the level 2 screening provides more detailed information on the characteristics of actual flood risk associated with the relevant site allocations. The level 2 screening provides site-specific

¹ NPPF 2018 – section 14 paragraphs 158-159

flood risk assessment requirements and potential options to manage flood risk which will be considered further by developers when preparing an FRA.

7. Brighton & Hove Wildlife Study Review 2017 – Update 2020

The Brighton & Hove Wildlife Study Review 2017 was published with the draft City Plan Part Two (CPP2) in July 2018. Through the review twenty six existing Sites of Nature Conservation Importance (SNClS) were assessed as being worthy of retention and were renamed as Local Wildlife Sites (LWS) and included on the draft CPP2 policies map. Twenty-four new sites were endorsed for designation and inclusion in the draft CPP2. Seven sites were identified as having potential to be designated as LWS, pending an assessment of up-to-date survey information; these sites were listed as candidate LWS within the draft CPP2.

As part of the consultation on the draft CPP2 between July and September 2018 the owners and occupiers of sites were notified of designations and provided with copies of site citations. Following Defra guidance, landowners/ occupiers were given the opportunity to consider whether the proposed designation appropriately reflected the biodiversity interest of the site with the opportunity to submit evidence to support their observations. The evidence submitted was carefully considered by the County Ecologist and the Technical Panel, along with the original data upon which the recommendation was made. The Update to the 2017 Review outlines the changes following consideration of the consultation responses.

Representations made on the draft CPP2 consultation led to the re-assessment of 11 sites, with the outcome summarised as follows. The boundary of one existing site was amended, two existing sites were resurveyed and retained unchanged, one proposed new site was resurveyed and a decision was taken not to proceed with the designation, and seven candidate sites were surveyed or reassessed. Where the panel recommended candidate sites should be designated, consultation was carried out with landowners/ occupiers of these sites. Of these candidate sites, two have been designated, four will not be designated and one will be retained as candidate LWS.

The resultant suite of LWS within Brighton & Hove is therefore 51 LWS, 26 of which were previously designated as SNClS, 25 new LWS have been recommended and one candidate LWS. The Proposed Submission City Plan Part Two policies map and Appendix 3 List of Local Wildlife Sites of the Proposed Submission City Plan Part Two and Policy DM37 Nature Conservation and Green Infrastructure have been amended accordingly.

