

Submission City Plan Part One

Brighton & Hove City Council's Local Development Framework

June 2013

Housing Delivery Technical Background Paper



**Brighton & Hove
City Council**

Housing Delivery Technical Background Paper (CP1, CP19 and CP20)

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1. Introduction

1.1 The purpose of this paper is to provide technical information to support the council's approach to housing delivery which is detailed in the Submission City Plan policies CP1 Housing Delivery; CP19 Housing Mix and CP20 Affordable Housing.

1.2 Policy CP1 Housing Delivery sets a minimum housing delivery target of 11,300 additional homes to be delivered across the city by 2030. The policy reflects the overall spatial strategy for the future development and growth of the city and is supported by the Sustainability Appraisal. It sets the broad locations and distribution for housing delivery and details how this will be managed in accordance with government requirements for an ongoing five year land supply.

1.3 Policies CP19 and CP20 then provide the policy framework to ensure that the scale of housing delivered over the Plan timescale provides for an appropriate mix and choice of housing in terms of housing type, size and tenures and that this responds to the housing requirements of the local population.

1.4 This paper will demonstrate that the derivation of the City Plan's housing target and delivery strategy has followed national planning policy guidance for 'sustainable development' as set out in the National Planning Policy Framework (NPPF) and government good practice guidance for technical studies such as Strategic Housing Land Availability Assessments and Strategic Housing Market Assessments.

1.5 A full detailed justification for the council's approach to housing delivery is provided and the paper concludes that this approach meets the soundness tests¹ set out in the NPPF for plan preparation, in that:

- The plan has been **positively prepared** and has sought to meet objectively assessed housing requirements so far as is reasonable to do so and consistent with achieving the overall aim of sustainable development for the city of Brighton & Hove;
- The housing target and delivery strategy set out in the plan is **justified** and represents the most appropriate delivery strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- The housing delivery strategy is **effective** and deliverable over the plan period to 2030 and has addressed joint working on cross-boundary strategic priorities; and
- The housing delivery strategy is **consistent with national policy**, will provide for a significant boost in housing supply and will enable the delivery of sustainable development in accordance with the policies set out in the NPPF.

¹ Paragraph 182, NPPF, March 2012

1.6 This paper should also be read in conjunction with the following papers published to support the City Plan:

- Duty to Co-Operate Compliance Statement – BHCC City Plan Technical Paper, December 2012 and Submission Update June 2013
- Housing Implementation Strategy – Annex 3 to Proposed Submission City Plan.

2. Background

2.1 The Brighton & Hove 'Core Strategy' (Submission Version, April 2010) was agreed at full Council in December 2009 and was submitted to the Secretary of State for examination in April 2010. The examination was suspended following an Exploratory Meeting with the appointed Planning Inspector in May 2010. The Inspector raised soundness concerns about the housing delivery strategy in the submitted document. He was concerned that insufficient housing sites had been identified to meet the (then) South East Plan target of 11,400 new homes (by 2026) and that the strategy had relied too much on windfall (unexpected) housing development coming forward. The Core Strategy was subsequently withdrawn at Council in July 2011.

2.2 In September 2011, the City Council's Cabinet agreed a new work programme to prepare the City Plan Part 1 to update and replace the council's Brighton & Hove Core Strategy. The City Plan Part 1 provides a strategic vision for the city to 2030; it sets out the overall scale of future development to be provided and the broad locations where major development will go; it identifies the essential infrastructure required and will help to deliver other city wide strategies. Part 2 of the City Plan will subsequently be prepared to identify further site allocations required and to set out more detailed development management policies.

2.3 The need to replace the Core Strategy has also arisen from a number of significant changes since the 2010 Exploratory Meeting including changes to national legislation and policy (Localism act and National Planning Policy Framework-NPPF), changes to the economy and the completion of updated housing studies.

3. National Policy Guidance

3.1 The National Planning Policy Framework² (NPPF) sets out the governments' planning policies for England and how these are expected to be applied. The NPPF constitutes guidance for local planning authorities and decision-takers in drawing up plans and as a material consideration in determining planning applications.

3.2 The introduction to the NPPF notes that is intended to provide a framework:

'within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities' (para 1).

3.3 Of key importance is **NPPF paragraph 14** which sets out a '**presumption in favour of sustainable development**' which the NPPF states should be seen as a golden thread running through plan making and decision taking.

3.4 The NPPF states that for **plan-making** this means that:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, **unless***
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate developments should be restricted (para. 14, NPPF)..*

3.5 This paragraph is the prime test for assessing the adequacy of the City Plan housing target. It requires that local planning authorities should positively seek opportunities to meet the development needs of their area and that Plans should meet 'objectively assessed needs' unless there would be significant adverse impacts of doing so. Further sections of this paper will demonstrate that there would be significant adverse impacts associated with a housing target of the scale required to meet objectively assessed housing needs in full and that this would be in conflict with the policies of the NPPF taken as a whole.

3.6 The government's '**core planning principles**' are set out at paragraph 17. In summary these are that planning should:

² National Planning Policy Framework, March 2012, Communities and Local Government.

- *be genuinely plan-led;*
- *not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving places that the country needs. Every effort should be made objectively to identify and meet the housing, business and other development needs of an area, and respond to wider opportunities for growth;*
- *secure high quality design and a good standard of amenity for all existing and future occupants;*
- *recognise the intrinsic character and beauty of the countryside;*
- *support the transition to a low carbon future in a changing climate;*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value;*
- *promote mixed use developments and encourage multiple benefits from the use of land;*
- *conserve heritage assets;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;*
and
- *take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs.'*
(para. 17, NPPF)

3.7 These core planning principles are highly relevant to the preparation of the City Plan and its housing delivery policy. Many of the core principles are reflected in the City Plan's 23 strategic objectives which have shaped the strategic vision and spatial strategy for the future development of the city over the plan period to 2030 (see section 4 of this paper).

3.8 In terms of **plan-making**, the NPPF notes that Local Plans are:

'the key to delivering sustainable development that reflects the vision and aspirations of local communities' (NPPF, para 150).

3.9 It also acknowledges that local planning authorities should:

'seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three (NPPF, para. 152).'

3.10 It further notes that:

‘significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued’ (para. 152) .

3.11 It advises that local planning authorities should set out the strategic priorities for the area in the local plan and that this should include strategic priorities to deliver:

- homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy;
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.12 The guidance is clear that each dimension of ‘sustainable development’ is important and that net gains across all three dimensions should be planned for. Such an approach has been fundamental to the preparation of the City Plan Part 1 which sets out a spatial vision and strategic objectives which seek a balance between accommodating the city’s development needs, particularly that for jobs and homes, with the continuing need to protect and enhance the city’s high quality built and natural environments and the nationally designated landscape (South Downs National Park) that surrounds the city.

3.13 In terms of national planning policy guidance specifically for housing delivery paragraphs 47–55 of the NPPF outline guidance for delivering new housing. Paragraph 47 addresses the supply of housing and sets specific land supply requirements. Of particular relevance is the opening part of this paragraph and the first bullet point which state:

‘To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework;’ (para. 47)*

3.14 Other parts of this paper will demonstrate that the council’s housing delivery strategy seeks to boost significantly the supply of housing delivered in the city over the plan period and has sought to maximise housing delivery so far as is consistent with other key strategic priorities and development needs of the city.

3.15 The other key area of national policy guidance within the NPPF in terms of addressing housing requirements and planning for new housing delivery concerns the evidence base. Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area and that they should:

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *caters for housing demand and the scale of housing supply necessary to meet this demand;*
- *prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period (para. 159, NPPF).*

3.16 The council has prepared a Strategic Housing Market Assessment and has updated the critical elements of this in relation to the city's overall housing requirements (for market and affordable housing) for the plan period to 2030³. It has also undertaken comprehensive Strategic Housing Land Availability Assessments with annual updates to inform future housing delivery. These studies are further outlined in the subsequent sections of this paper.

³ Strategic Housing Market Assessment, DTZ, 2008; Brighton & Hove Housing Requirements Study, June 2011, GL Hearn; Brighton & Hove Housing Requirements Study 2012 Update, Update November 2012; Brighton & Hove - Need for Affordable Housing, GL Hearn, December 2012.

4. Strategic Context for Housing Delivery in Brighton & Hove

4.1 The vision, strategic objectives and the overall spatial strategy for the future development of Brighton & Hove is set out within Section 2 of the City Plan. The vision is described under four main headings; each of which set a number of strategic objectives from which the spatial strategy and citywide policies are developed. Taken together, the vision, strategic objectives and spatial strategy provide a framework that identifies and defines what is considered ‘sustainable development’ for Brighton & Hove.

4.2 The following table identifies the four key elements to the strategic vision for the city and summarises the associated objectives:

Table 1: Spatial vision and strategic objectives

Spatial Vision Headings	Summary of strategic objectives
A strong and prosperous city	<p>Ensure all major new development supports an improvement of the economic performance of the city and regeneration in key areas.</p> <p>Develop Brighton & Hove as a major centre on the South Coast for sustainable business growth and innovation.</p> <p>Deliver new housing that is capable of meeting the needs of different communities and achieves a mix terms of type, size and tenures; is affordable, accessible, designed to a high standard and adaptable.</p> <p>Maintain and strengthen the role of Brighton city centre in terms of its cultural, tourism, retail and leisure mix.</p>
A sustainable city	<p>Work towards a reduction in the ecological footprint of the city; champion the efficient use of natural resources and overall environmental sustainability.</p> <p>Support objectives of the Biosphere Reserve; conserve and enhance biodiversity; create a functioning green infrastructure network.</p> <p>Provide an integrated safe and sustainable transport system.</p>
An attractive city	<p>Ensure design excellence which responds to the distinctive character of city’s different neighbourhoods.</p> <p>Enhance and maintain the varied heritage and culture of the city.</p>

	<p>Conserve and enhance the South Downs National Park.</p> <p>Promote new opportunities for sport and recreation; protect and enhance parks and green spaces in the city.</p>
A healthy city	<p>Contribute towards the delivery of more sustainable communities and reduce inequalities between communities.</p> <p>Apply principles of healthy planning across the city; work with partners to achieve parity in provision of and access to community services.</p> <p>Ensure Brighton & Hove is a safe city; reduce crime and fear of crime.</p>

4.3 Those strategic objectives which relate most directly to housing delivery are:

SO4 - Address the housing needs of Brighton & Hove by working with partners to provide housing that meet the needs of all communities in the city, achieves a mix of housing types, sizes and tenures that is affordable, accessible, designed to a high standard and adaptable to future change.

SO9 - Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

SO12 - Ensure design excellence which responds positively to the distinctive character of the city’s different neighbourhoods and creates an attractive and accessible well-connected network of streets, spaces and buildings.

SO19 – Contribute to the delivery of more sustainable communities and the reduction of inequalities between neighbourhoods in Brighton & Hove.

Strategy for Accommodating Future Growth

4.4 Brighton & Hove is a coastal city providing a sub-regional focus for jobs and services to the surrounding areas. The local authorities along the Sussex Coast face similar issues around physical and environmental constraints to accommodating further growth and ensuring a balanced approach to housing and employment provision. Situated between the South Downs National Park and the sea, the city is tightly constrained. With a limited legacy of derelict or vacant sites these natural boundaries define and limit the outward expansion of the city.

4.5 The aim of the City Plan is to seek a balanced and sustainable approach to accommodating growth over the plan period. The spatial strategy set out in the Plan seeks to achieve a balance between accommodating the city’s development needs, particularly for homes and jobs, with the continuing

need to protect and enhance the city's high quality environments and the nationally designated landscape that surrounds the city.

4.6 The assessed housing requirements (demand and need for housing) for the city over the plan period are much higher than the city can realistically accommodate (see Section 5 of this paper). The Plan sets a minimum housing target of 11,300 new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environments of the city.

4.7 The City is expected to continue to function as an economic growth hub for the wider sub-region and the council with its partners share an ambition to improve the city's employment rate. Recent studies have consistently identified the shortage of employment premises and employment land supply as threats to business and employment growth in the city. The 2012 Employment Land Study forecasts employment land requirements of 112,240 sq m of office space (B1 and B1b and 43,430 sq m of industrial floorspace (B1c, B2 and B8) over the plan period to 2030. The spatial strategy therefore seeks to ensure that employment sites across the city are safeguarded and upgraded and through the regeneration of key sites new employment floorspace created. In order to achieve the local housing target strategic allocations and some employment sites have been identified to bring forward a mix of housing and employment floorspace.

4.8 To ensure successful regeneration of the city, other development needs generated by a growing population also need to be accommodated. This includes new schools, new retail and community facilities, sports and recreation and cultural provision. As the population density of the city increases, the demand for and use of parks and open spaces increases. The council aims therefore to optimise the use of previously developed land whilst ensuring sufficient green infrastructure is retained and provided alongside new development.

4.5 It is against this context that the city's housing delivery target has been derived.

5. Evidence Base for Housing Delivery – Objectively Assessed Housing Needs - Need and Demand for Housing

a) Strategic Housing Market Assessment (2008)

5.1 The council's Strategic Housing Market Assessment⁴ (SHMA) forms an important part of the evidence base regarding the need and demand for housing within Brighton & Hove. The 2008 SHMA:

- defines the spatial extent of the city's housing market and identifies wider relationships with sub-regional housing and labour market areas;
- provides evidence of the demographic and economic drivers of the housing market;
- provides evidence on the stock and supply of housing and the implications for affordability; and
- It also provides evidence of the housing requirements of particular household groups such as the elderly and students.

5.2 In terms of addressing Brighton & Hove's numerical housing requirements the 2008 SHMA reviewed the proposed housing targets that were being progressed as part of the preparation of the South East Plan (Draft Plan stage and subsequent Panel Report) but did not seek to undertake new work in terms of economic and demographic projections. However, further studies have been undertaken to take forward this work to support the City Plan.

5.3 Appendix 1 illustrates how the 'core outputs' required from a SHMA exercise have been met and updated where required through further housing studies.

b) Brighton & Hove Housing Requirements Study – June 2011, GL Hearn

5.4 In 2011 Brighton & Hove City Council commissioned consultants GL Hearn to provide an up to date assessment of the city's numerical housing requirements based on up to date demographic and economic performance factors. This followed the government's announcement (July 2010) that it intended to abolish Regional Spatial Strategies through the enactment of the Localism Bill. The 2011 Brighton & Hove Housing Requirements Study⁵ informs and supports the development of the City Plan (Part 1) and forms part of the plan's evidence base.

5.5 The June 2011 Brighton & Hove Housing Requirements Study established that a realistic numerical assessment of housing need/demand for the city over the period 2010 – 2030 would fall within the following range:

- **15,800 – 19,400 new home (790 – 970 per annum)**

⁴ Brighton & Hove Strategic Housing Market Assessment, April 2008, DTZ

⁵ Brighton & Hove Housing Requirements Study, June 2011, GL Hearn.

5.6 The upper end of this range reflected a demographic based assessment of housing demand based on population/ household projections incorporating ONS 2008–based migration assumptions. The lower end of the range is based on economic performance assumptions which take account of the city’s commuting dynamics recognising the role the city plays within the wider labour market in terms of the labour demand for housing.

c) Brighton & Hove Housing Requirements Update – October 2012, GL Hearn

5.7 Subsequent to the June 2011, the following further information was published:

- Publication by the Office for National Statistics of 2010-based Sub National Population Projections in March 2012 and 2011-based interim projections covering 2011 – 2012 (published September 2012);
- Initial release of 2011 Census data in July 2012 providing new information on the city’s population by age and sex and the number of households – subsequently updated in September 2012.

5.8 In response, the council commissioned consultants GL Hearn to update the 2011 Housing Requirements Study modelling to take account of this new information, to ensure the council’s planning policies were based on the most up-to-date information.

5.9 The 2012 Update Report⁶ provides revised projections of housing requirements based on demographic trends, an understanding of demographic components of change and a consideration of how economic growth could influence housing requirements. In terms of economic data, the update uses 2012 econometric projections in contrast to the 2010-based projections used in the 2011 study.

5.10 The 2012 Update Report concludes that the most realistic demographic projection of future (unconstrained) housing requirements indicates a requirement for:

- **15,800 additional homes over the 2010 – 2030 plan period (equivalent to 790 new homes per annum)⁷**

5.11 This takes account of the most recent demographic data; how migration patterns may be influenced by changes in the population age structure both in the city and in areas from which there is typically migration to the city. This figure implies population growth over the plan period of 10.2% and employment growth of 12.6%⁸.

⁶ Housing Requirements Study, Brighton & Hove City Council, October 2012 Update, GL Hearn.

⁷ Para. 5.7, Housing Requirements Study, October 2012, GL Hearn.

⁸ See Figure 5.1 Summary of projections 2010 – 2030, GL Hearn, Housing Requirements Study Update, October 2012.

5.12 The equivalent projection (compared to the 2011 study) based on economic performance suggests a lower housing requirement for 14,250 new homes over the plan period which takes account of employment growth in the city as well as in wider areas in which the city's residents have traditionally worked. This figure would imply population growth of 9% over the plan period and employment growth of 11.4%⁹.

5.13 The 2012 update report notes that the lower assessments of housing need/demand, relative to the 2011 Study, reflect evidence of higher current household sizes in the city revealed by the 2011 Census data. This results in more moderate forecasts of future reductions in the household size moving forward. In addition, the 2011-based interim Sub National Population Projections project a lower level of net migration than the earlier 2008 and 2010 –based versions. There are also some moderate effects in the future from differences in the population age structure in 2011 and thus how this is expected to change moving forwards¹⁰.

c) Assessment of Affordable Housing Need, December 2012, GL Hearn.

5.14 The council's 2012 Assessment of Affordable Housing Need Study¹¹ considers the need for affordable housing within Brighton & Hove over the period 2012 – 2017. It draws upon data from the council's Joint Housing Register, demographic projections and local income information.

5.15 Government guidance on Strategic Housing Market Assessments¹² sets out a model for assessing housing need (known as the Basic Needs Assessment Model). This model was used in the assessment for Brighton & Hove. It is a statutory requirement to underpin affordable housing policies. The net need is calculated as follows:

*Net Need = Backlog of Need + Need from Newly-forming Households + Existing Households falling into Need – Supply from Affordable Housing*¹³.

5.16 On the basis of assuming no more than 25% of households' gross income is spent on housing costs, the study concludes there is likely to be a net housing need for 17,400 affordable homes over the 2012 – 2017 period¹⁴. However, given the city's high housing costs, the study undertook a sensitivity analysis based on the assumption that, in reality, many households may spend at least 35% gross household income on housing costs. The sensitivity analysis indicates a net need for 12,500 affordable homes for the same period¹⁵. Both analyses include a backlog need estimated to be 7,980 households.

⁹ As above.

¹⁰ Paragraph 5.9, 2012 Housing Requirements Study.

¹¹ Assessment of Affordable Housing Need, Brighton & Hove City Council, December 2012, GL Hearn.

¹² CLG (2007) Strategic Housing Market Assessment – Practice Guidance.

¹³ See Section 9, Assessment of Affordable Housing Need, GL Hearn, December 2012.

¹⁴ As above.

¹⁵ Both estimates take account of future affordable supply from re-lets and affordable housing schemes in the development pipeline.

5.17 The study notes that the ‘Basic Needs Assessment Model’ is designed to identify a shortfall of genuine affordable housing and it assumes all households in ‘housing need’ are housed in affordable homes. In reality, the study notes two key factors need to be considered:

- Some households defined in housing need may choose to spend more than 25% of their gross income on housing costs (hence the alternative modelling at 35% threshold) or may not actively seek an affordable home; and
- Some households defined as in housing need are accommodated in the Private Rented Sector supported by Local Housing Allowance.

5.18 The modelling undertaken in the study indicates that based on current circumstances the private rented sector in the city could meet the needs of 9,200 households over the 2012 – 2017 period¹⁶.

5.19 Given the current stock of affordable housing in the city (16%¹⁷), the uncertainties regarding future funding for affordable housing and the city’s constrained housing land supply it is unrealistic to assume that all housing need can be met through the provision of new affordable homes. In practice, it is likely that the private rented sector will continue to play an important role in meeting the housing needs of the city.

d) Housing Duty to Co-Operate Study – Sussex Coast Housing Market Area, May 2013, GL Hearn.

5.20 A housing duty to co-operate study was commissioned by the local authorities of Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing within the Coastal West Sussex Housing Market Area (HMA) together with the South Downs National Park Authority. The study draws together evidence from a range of studies to provide an independent and consistent view of objectively assessed housing needs for each authority and across the HMA, addressing the need for market and affordable housing. The study was noted by the Coastal West Sussex Strategic Planning Board (May 2013) and it was agreed that officers could use the study for discussions with adjoining authorities regarding meeting housing needs. The study was endorsed by the council’s Economic Development and Culture Committee 20 June 2013.

5.21 The study also assesses residential land supply and capacity in each area including environmental, landscape and infrastructure constraints to consider the balance between potential supply and demand, to quantify and consider the implications of a potential shortfall in housing provision across the HMA and how this might be addressed (see Section 6 of this paper and the Duty to Co-Operate Compliance Statement and Statement of Common Ground, June 2013).

¹⁶ See Section 10, Assessment of Affordable Housing Need, GL Hearn, December 2012.

¹⁷ 2011 Census Data.

5.22 In terms of Brighton & Hove’s housing requirements, the study notes the findings of the 2011 and 2012 Housing Requirement Studies (as noted above) together with the findings of the December 2012 Assessment of the Need for Affordable Housing. Housing requirements for the city were also part of the Coastal West Sussex SHMA (November 2012). The methodology across all of these studies is consistent and all were led by GL Hearn.

5.23 The study concludes that **an objective assessment of housing need for the city**, taking account of the strong levels of housing need identified, the demographic evidence and the potential for improved economic performance would fall between:

- **800 – 1000 dwellings per annum or 16,000 – 20,000 dwellings to 2030** (representing between 0.6 – 0.8% growth in the housing stock per annum)¹⁸.

5.24 The study notes that the higher end of this range takes account of the shortfall of affordable housing in the city and includes provision of 210 dwellings per annum to contribute to reducing the affordable housing backlog over the plan period. The lower end aligns to the demographically driven projection.

5.25 The objective assessment of housing need for the Sussex Coast HMA is set out in the table below:

Table 2: Objective Assessment of Housing Needs –Sussex Coast HMA

	Low	High	Median
Arun	550	650	600
Adur	215	245	230
Chichester	480	590	535
Worthing	430	480	455
Brighton & Hove	800	1000	900
Lewes	425	450	440
HMA Total	2900	3415	3160

Source: Housing Duty to Co-Operate Study, GL Hearn, 2013.

¹⁸ See paras. 4.43 – 4.46, Housing Duty to Co-Operate Study, Sussex Coast HMA Partners, GL Hearn.

6. Evidence Base – Housing Land Supply

6.1 Strategic Land Availability Assessments (SHLAAs) are used to identify and assess land/sites with potential for housing development. The SHLAA process helps to establish realistic assumptions about site availability, suitability for housing and the likely economic viability and overall deliverability of sites identified as having potential for housing.

6.2 Good practice guidance ‘Strategic Housing Land Availability Assessments’ was published in July 2007 by CLG and reflected policy guidance set in PPS3 at that time¹⁹. This extant guidance states that:

‘as a minimum, the SHLAA should aim to identify sufficient specific sites for at least the first ten years of a plan, from the anticipated date of adoption, and ideally for longer than the whole 15 year plan period’ (para 7).

6.3 Where it is not possible to identify sufficient sites, the guidance states that the SHLAA:

‘should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are genuine local circumstances that mean a windfall allowance may be justified in the first 10 years of the plan’ (para.7)

6.4 With the publication of the NPPF, there are some slight amendments to these requirements. Paragraph 47 of the NPPF now requires local planning authorities to:

- *Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition*
- *Identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11 – 15 (paragraph 47, NPPF). .*

6.5 In terms of allowances for windfall development, the NPPF states at paragraph 48:

‘Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply’ (paragraph 48, NPPF)

6.6 In relation to the preparation of the City Plan (Part 1), three SHLAA exercises have been undertaken to inform the evidence base regarding the likely supply and delivery of housing over the plan period. These are:

¹⁹ Planning Policy Statement 3: Housing (CLG, 2006)

- a) **The 2010 SHLAA (GVA Grimley, March 2011);**
- b) **The 2011 SHLAA Update – Brighton & Hove City Council**
- c) **The 2012 SHLAA Update – Brighton & Hove City Council, plus the 2012 SHLAA - Revised Trajectory.**

2010 SHLAA (GVA Grimley, March 2011)

6.7 In September 2010, the council commissioned consultants GVA Grimley to undertake a comprehensive review and update of the city's SHLAA to help inform local plan preparation and particularly the process of determining a local housing target for the provision of new housing in the city. The approach taken follows the CLG Practice Guidance for undertaking SHLAAs.

6.8 The assessment drew upon a long list of sites compiled from nine 'sources' which included previous SHLAA sites; a call for sites exercise; urban fringe sites; the Open Space Study Update; allocated employment sites and additional secondary (un-allocated) employment sites. Seven criteria were used to assess sites:

- Policy alignment
- Physical constraints
- Market attractiveness
- Ownership
- Current use
- Accessibility; and
- Sustainability.

6.9 A detailed scoring procedure was used to assess sites against these criteria which was then used to provide an informed assessment of site suitability for housing, the availability of sites; viability considerations and the overall delivery timescales for development.

6.10 In terms of assessing site capacity, the density assumptions incorporated for site potential were ambitious and, where relevant, took account of taller building opportunities in appropriate locations.

6.11 The 2010 SHLAA identified specific sites within the existing built up area capable of providing approximately 8,000 dwellings²⁰ over the Plan's 20 year timeframe. It also anticipated that continued development from small windfall sites would make a valid contribution to the city's overall supply of new housing. However, national planning policy guidance at the time (PPS3) set tough tests for allowing windfall to be counted towards supply in the first ten years of a plan period.

²⁰ This figure includes amendments made to correlate 2010 SHLAA timescales with those of the City Plan.

6.12 In terms of identifying additional opportunities for housing supply, the 2010 SHLAA concluded that opportunities for identifying broad locations outside the city were limited due to the close proximity of the South Downs National Park to the built up area of Brighton & Hove.

6.13 **Potential additional sources of supply** which might further boost housing delivery were suggested in the concluding section of the report²¹. These were outlined as follows:

- i) Investigate housing potential from safeguarded employment sites;
- ii) Explore the re-use for housing of some private open space;
- iii) Investigate the potential of urban fringe sites for housing;
- iv) Explore the potential for housing from regeneration opportunities associated with council's (HRA) Estates Master Plan;
- v) Consider further residential opportunities at Shoreham Harbour
- vi) Consider the scope for additional housing through increased densities of development.

6.14 In summary, the 2010 SHLAA discussed these further sources as follows:

i) Investigate housing potential from safeguarded employment sites

6.15 The 2010 SHLAA notes that updated Employment Land Reviews can establish the most up to date employment land requirements and appropriate locations where employment land should be retained and protected. The SHLAA notes that this source of supply is only likely to provide a limited amount of additional housing land potential and that the council should remain committed to ensure that an appropriate amount and portfolio of sites to support future employment growth is available²².

ii) Explore re-use of Private Open Space

6.16 The 2010 SHLAA refers to the city's Open Space Study (March 2011) and the fact that some sites are identified where the open space offer is poor and could potentially be suitable for some alternative use. It suggests a policy review to ensure that only appropriate alternative uses and at an appropriate scale should be considered. The SHLAA notes that housing may not be considered an appropriate alternative use²³.

iii) Investigate the potential of Urban Fringe Sites

6.17 The SHLAA notes that a large proportion of the urban fringe provides part of the city's outdoor recreation and leisure space as well as an important role in local food production. It suggests that best efforts should be made to ensure all previously developed land/sites within the city should be promoted first. In terms of the potential for any development from the urban fringe, the

²¹ See section 8 of the 2010 SHLAA.

²² Para. 8.36, 2010 SHLAA.

²³ Para. 8.37, 2010 SHLAA.

study concluded a further review of sites would be required to identify the most suitable sites. It suggests that only the most suitable urban fringe sites should be further considered for alternative uses and where housing is considered appropriate it should be directed towards housing types difficult to accommodate elsewhere in the city²⁴.

iv) Explore potential from Housing Regeneration Opportunities

6.18 The 2010 SHLAA refers to the council's Housing Revenue Account (HRA) Estates Master Plan as a potential opportunity for further housing supply. It suggests an Estates Renewal Strategy could identify the city's estates and assess their lifespan. This would present the council with an opportunity to improve the existing housing supply and also increase it where longer term development and regeneration opportunities could be identified²⁵.

v) Shoreham Harbour

6.19 The 2010 SHLAA assessment identifies growth at Shoreham Harbour as offering good potential for a broad location and noted that preliminary work (by the three local planning authorities involved) had involved capacity and viability studies; transport modelling and flood risk modelling. The SHLAA noted there was an opportunity to take forward any housing development as contributing towards the city's housing target and that this could be incorporated within later versions of the SHLAA²⁶.

vi) Additional housing through increased densities of development

6.20 The 2010 SHLAA suggests there may be an opportunity to deliver additional housing through increased densities of development. However, it acknowledges that this would only be applicable in appropriate character areas and that central areas of the city already have very high densities of housing²⁷. It points to sustainable locations for higher density development such as those with existing infrastructure, particularly high capacity public transport hubs. It suggests areas around railway stations within the city and arterial routes with good bus links may be able to sustain higher density development and should be seen as potential broad locations for residential development. The SHLAA accepts that sites within the (then) submitted Core Strategy seven 'Development Areas' had already been thoroughly assessed through the SHLAA and therefore it would be difficult to justify any additional capacity to parts of these broad locations²⁸.

2011 and 2012 SHLAA Updates

6.21 The 2011 and 2012 SHLAA Updates carry forward the 2010 SHLAA as annual updates. They incorporate:

²⁴ Paras. 8.38 – 8.40, 2010 SHLAA

²⁵ Paras. 7.83 – 7.84 and 8.33 – 8.34, 2010, SHLAA

²⁶ Paras 7.79 – 7.82, 2010 SHLAA.

²⁷ Paras. 7.85 – 7.88, 2010 SHLAA.

²⁸ As above. 2010 SHLAA.

- Adapting the 2010 SHLAA to the City Plan Part 1 timeframes. The anticipated adoption date for the plan is 2014 so the three five year supply timeframes start from April 2014. Supply in the pre-plan adoption period 2010 – 2014 is also assessed.
- Results from the BHCC annual residential development monitoring exercises.
 - inclusion of newly identified sites gaining planning consent for residential development in the monitoring year;
 - updating site progress for those sites with an extant consent;
 - adjusting overall supply where schemes are completed;
- The inclusion of any other sites submitted for consideration.
- Ongoing reviews and amendments to SHLAA site data to reflect further technical work undertaken to help inform City Plan preparation (for example, the consultation on Planning Policy Options (October – December 2011) and the consultation on the Draft City Plan (Summer 2012) . This includes:
 - site capacity, feasibility and viability work affecting major strategic site allocations within the City Plan 8 Development Areas DA1 – DA8;
 - results from the 2012 Employment Land Study (in terms of how this impacts upon potential for any additional mixed use employment/housing sites);
 - ongoing dialogue with landowners, local agents and developers.
- Updating housing trajectories illustrating the anticipated rate of residential development over the plan period.

6.22 The 2012 SHLAA informs the housing delivery target set in CP1 Housing Delivery Policy in the Proposed Submission City Plan (Part 1). It identifies:

- 9,200 units on sites of 6+
- 648 units from sites of up to 5 units;
- 900 units from two 'broad locations'; 400 at DA8 Shoreham Harbour and 500 from the council's own land (Estates Master Plan);
- A potential for 780 units from small windfall development in the post ten year supply period²⁹. A minimal allowance of 600 units is included as part of the city's housing target post 2024.

6.23 The 2012 SHLAA also informs the housing trajectory which illustrates the rate of anticipated development over the plan period. Annex 3 to the City

²⁹ Small windfall site development will continue to come forward throughout the plan period and will contribute towards meeting the housing delivery target. An allowance for windfall development has only been made in the post 10 year period to accord with guidance in the NPPF for an identified 10 year supply. The CPI housing target allows for a minimal windfall allowance – just 100 dwellings per annum in the post 2024 supply period.

Plan Part 1 – Housing Implementation Strategy provides a commentary on the housing trajectory (see also section 10: Managing Housing Delivery).

6.24 The additional potential sources of supply recommended for further consideration in the 2010 SHLAA have been further addressed as follows:

i) Review potential of current safeguarded employment sites

6.25 The Employment Land Study Review 2012³⁰ provides an up to date assessment of the employment land requirements for the city over the plan period to 2030. Future requirements for employment space were assessed under a range of economic scenarios and approaches. The study recommended that the City Plan be guided by the following additional employment land requirements:

- A quantitative need for 112,240m² B1a, B1b office floorspace; and
- A more modest requirement for 43,430m² B1c, B2 and B8 floorspace.

6.26 This forecast requirement was considered to best reflect the Council's economic vision for the City and is comparable to the previous 2006/09 forecast requirements for office floorspace. The study concludes that the council's approach to employment land should aim to at least fully meet these requirements over the plan period so that the city's economy is not constrained.

6.27 However, in re-assessing the existing portfolio of employment sites and the identified potential supply of employment land likely to come forward during the plan period, the study noted a potential shortfall of employment floorspace. The shortfall (as indicated in the Proposed Submission City Plan policy CP3 of 16,240 – 21,000 sq m of B1a, B1b floorspace and 33,930 B1c, B2 and B8 floorspace) arises from capacity and viability assessments undertaken on a number of strategic allocations since the draft City Plan was published; consultation comments and also reflects the fact that the earlier 2006/09 employment land studies identified a negative requirement for industrial space (and accordingly the Draft City Plan made very limited specific provision for industrial needs). It will be important therefore for Part 2 of the City Plan to try and address any unmet need through further site allocations to ensure the city can accommodate further business growth and achieve its economic potential through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership.

6.28 In view of these requirements and the City Plan strategic objectives related to the city's local economy, it is not considered appropriate to allow further losses of employment sites. Indeed in re-assessing the employment sites listed in Policy CP3 Employment Land the Employment Land Study Review 2012 noted the market attractiveness of sites was generally high reflecting a low vacancy rate. Even though a number of sites scored less well

³⁰ Brighton & Hove Employment Land Study Review 2012, NLP, December 2012.

due to factors such as physical appearance or local access, they were all found to be meeting employment needs and no sites were specifically identified as candidates for release to other uses. The 2012 SHLAA does allow for considerable mixed use development on many of the city's key strategic development sites identified in the City Plan, mixed use development on a further 5 safeguarded employment sites (see CP3.4) and mixed use on many of the city's secondary (currently not allocated) employment sites.

ii) Review re-use of Private Open Space

6.29 The potential for any release of open space for alternative uses including housing is addressed through City Plan Policy CP16 Open Space. A significant increase in open space provision is required over the plan period (an additional 170 hectares is required which equates to a 13% increase). Given the city's physical and environmental constraints it is recognised that there is likely to be a considerable shortfall in terms of additional open space provision over the plan period. This position justifies a policy approach which primarily seeks to retain and improve the existing open space provision in the City and only allow for losses of open space under exceptional circumstances. Policy 'tests' for potential losses of open space are set out under Policy CP16. Private open space sites have been included in the SHLAA assessment where sites indicate some potential for housing.

iii) Review potential of Urban Fringe Sites

6.30 An initial assessment of urban fringe sites around the city's edge was undertaken to support the submission Core Strategy (April 2010). The potential of the urban fringe to make a contribution to the city's housing delivery was the subject of formal consultation at various stages of the city's Core Strategy preparation³¹. The submission version of the city's Core Strategy proposed that any potential sites within the urban fringe should only be considered on a 'contingency' basis in the latter part of the plan period.

6.31 This initial review of urban fringe sites has been updated and is appended as Appendix 2 for information. The majority of the city's urban fringe sites contribute towards the city's outdoor recreation resource and open space network. Many are in use as parks, playing fields and outdoor sports pitches. Some have a high environmental value in terms of biodiversity and are designated local nature reserves and sites of nature conservation importance. Others are important for local food production e.g. statutory allotments.

6.32 A considerable strategic opportunity for housing development was identified at the site known as Toads Hole Valley on the northern edge of the city. This 46.7 hectares of urban fringe was included for consideration at the Policy Options Consultation stage of the City Plan preparation (under Housing Target Options and Delivery Scenarios) and was carried through to the Consultation Draft City Plan stage as a new Development Area (DA7) and

³¹ See Final SA to City Plan: Appendix which summarises approach to Urban Fringe.

strategic allocation for mixed use development. It is a privately owned site and does not form part of the city's open space framework. No development is proposed for the area of land within DA7 currently designated as a Site of Nature Conservation Importance (SNCI).

6.33 The urban fringe assessment indicates that there are a small number of other sites identified as having some potential for housing development within the urban fringe. These are small sites and it was not considered appropriate to allocate them through Part 1 of the City Plan which focuses on strategic development opportunities. Preparation of the City Plan Part 2 (Site Allocations and Development Management Policies) will provide an opportunity to undertake a comprehensive review of the city's built up urban area boundary and this may allow additional urban fringe sites to be considered as housing site allocations through a formal consultation process. Communities will also need to be given the opportunity to propose sites for 'Local Green Spaces'; a new designation set out in the NPPF. It's possible that some urban fringe sites could be volunteered for this designation.

iv) Review potential from Housing Revenue Account Estates Masterplan work

6.34 An Estates Masterplan was developed for the council by consultants CB Richard Ellis (CBRE) in 2010. This provided a high level review and some initial case studies to help inform the best use of Housing Revenue Account (HRA) assets and enable an informed discussion about future HRA investment choices and regeneration opportunities. In all, development opportunities with a potential for over 800 new homes were identified; with approximately 500 units identified for medium term delivery.

6.35 Building on the work by CBRE the council has commissioned consultants GVA to carry out further viability and feasibility modelling against various funding options. The Homes and Community Agency is also assisting the council in an enabling capacity. Following further viability and feasibility modelling, sites and estates with development potential will then require consultation and detailed planning guidance.

6.36 An Estate Regeneration Programme³² has now been endorsed and identifies a programme of three phases, involving sites identified from the analysis of HRA stock and opportunities in the HRA estate master plan (produced in 2010 by CBRE Consultants), high level case studies prepared for some identified housing opportunities on HRA land (procured from GVA Consultants), business case appraisals for garage sites and further new opportunities. Indicative timelines suggest that a significant amount of development is not likely to commence until 2017.

6.37 Due to the complexity of the project, the City Plan has identified this source of housing delivery as a 'broad location' with the potential to deliver up

³² Housing Committee Meeting 6 March 2013 – New Homes for Neighbourhoods – Estate Regeneration Programme.

to 500 new homes over the plan period. As the project progresses and specific schemes are prioritised and brought forward, they will be included as identified sites in successive reviews of the SHLAA.

v) Review potential of Shoreham Harbour

6.38 The Brighton & Hove part of Shoreham Harbour has been identified as a broad location for future development with a capacity for around 400 new dwellings by 2030 (see Policy DA8 Shoreham Harbour). This is significantly lower than the initial target in the South East Plan (10,000 new homes). The change in the City Plan follows significant joint working with the Port Authority, Adur District and West Sussex County Council and is based on housing capacity evidence in the context of realistic infrastructure costs and an employment based approach to the harbour. The 400 additional units at the Harbour will contribute towards meeting the city's minimum housing provision target of 11,300 units. A Joint Area Action Plan is currently being prepared that will contain detailed policies for the harbour area. A series of Development Briefs are also being prepared to identify potential areas for development and the balance/mix of uses.

vi) Additional housing through increased densities of development

6.39 The approach taken in both the former Core Strategy (2010 Submission Version) and the City Plan is to focus development within the most accessible areas of the city and those with the most capacity for additional development (City Plan Development Areas DA1 – DA8). In terms of new residential development there are also significant opportunities across the rest of the city and this is reflected in the SHLAA and Policy CP1 Housing Delivery.

6.40 The City Plan policy CP14 Housing Density sets out the council's approach to housing density and sets challenging minimum density targets for new development. The purpose of the policy is to ensure that the city, which is compact and constrained, makes the most efficient use of the brownfield land available whilst ensuring that sustainable neighbourhoods are achieved.

6.41 Within the eight identified Development Areas (DA1 – 8), a minimum residential density of 100 dwellings per hectare (dph) is expected and outside Development Areas a minimum density of 50 dph is expected. In many instances, the density assumptions used in the SHLAA annual exercises to calculate potential site capacity exceed these minimum targets reflecting the fact that existing densities are generally high across much of the city.

6.42 Furthermore, Policy CP12 identifies a number of areas of the city which have the potential to accommodate taller buildings (defined as 18 metres or more in height). The policy recognises that taller buildings in appropriate locations offer an opportunity to increase density on existing brownfield land in a sustainable manner. Further detail on the boundaries of the tall building areas and guidance on appropriate height ranges will be provided through the

Submission City Plan – Housing Delivery Technical Background Paper

Urban Design Framework which is currently being prepared and due for adoption in 2014.

7. Housing Target Options considered for City Plan Housing Target – Policy Options Consultation October/Dec 2011

7.1 In October 2011 the council's Cabinet agreed four City Plan Policy Options Papers for consultation. These related to four specific policy areas where significant policy changes were proposed from the approach previously set out in the council's Core Strategy³³. These four policy areas were:

- housing targets and housing delivery;
- transport (park and ride);
- employment policy; and
- student housing.

7.2 Consultation was undertaken on the Options Papers between 17 October and 2 December 2011. The outcome of this consultation, the findings of updated studies and the publication of the National Planning Policy Framework have helped to shape the content of the draft City Plan Part 1.

7.3 The Housing Delivery Options Paper³⁴ looked at four housing target and delivery scenarios based on evidence from the Strategic Housing Land Availability Assessment (SHLAA)³⁵ and other technical work including capacity and viability assessments where available.

7.4 The paper identified a preferred housing target of 11,200 (Option 2) which sought to maximise housing provision from exploring additional sources of supply whilst maintaining a balanced spatial strategy that considered housing alongside the city's other development needs (particularly that for future employment provision and the retention of the existing open space resource).

7.5 The paper tested a lower housing target option which focussed on SHLAA based capacity within the existing built up area and one broad location (HRA Estates Master Plan regeneration opportunities). It also tested two higher target options both of which would require significant losses of employment land and/or open space to achieve the amounts of housing provision. Option 4 (15,800) accords with the lower end of the objectively assessed (unconstrained) housing requirement range for the city as assessed through recent Housing Requirement Studies (see section 5).

7.6 The following table summarises the four housing target options:

³³ Brighton & Hove Core Strategy, Submission Version April 2010. The Core Strategy was withdrawn from Examination in September 2010 and work began on a new City Plan.

³⁴ See full paper: Housing Delivery Options Paper, October 2011, BHCC.

³⁵ 2010 SHLAA and 2011 SHLAA Update exercises.

Table 3: Housing Delivery Target Options (October 2011)

Target Option (2010 – 2030)	Summary
<p>Option 1 – 9,800</p> <p>Baseline capacity provision within built up area maintaining ring-fenced approach to Shoreham Harbour</p>	<ul style="list-style-type: none"> • SHLAA capacity within built up area (sites of 6+ units), assuming challenging densities; taller buildings in appropriate locations and mixed use development on feasible sites. • Inclusion of small sites (< 6 units) with consent. • HRA Estates Masterplan Regeneration as a broad location • Small windfall allowance after first ten years of the Plan.
<p>Option 2 – 11,200 – Preferred option</p> <p>Maximise capacity within built up area; two broad locations and inclusion of strategic opportunity within urban fringe.</p>	<p>As for Option 1, but with addition of 1400 units from:</p> <ul style="list-style-type: none"> • Increased housing element on mixed use strategic and employment sites. • Strategic development opportunity within Urban Fringe (Toads Hole Valley) • Inclusion of housing opportunities at Shoreham Harbour (rather than ring-fenced).
<p>Option 3 – 13, 500</p> <p>Mid point between Preferred Target and lower end of objectively assessed full housing requirement range.</p>	<p>As for Option 2, with the addition of 2,300 units from:</p> <ul style="list-style-type: none"> • Net loss of Employment Sites to housing – approximately 11.5hectares³⁶ (8-14 sites depending on size of site). • Net loss of Open Space to housing – approximately 23 hectares.
<p>Option 4 – 15,800</p> <p>Lower end of objectively assessed full housing requirement range.</p>	<p>As for Option 2, but with addition of 4,600 units from:</p> <ul style="list-style-type: none"> • Net loss of Employment Sites to housing – approximately 23 hectares (16 – 28 sites depending on size of site). • Net loss of Open Space to

³⁶ Option 3: 1150 additional dwellings at 100dwellings per hectare would require 11.5 ha. 1150 additional dwellings from Open Space at 50 dph would require 23 ha. Same methodology for Option 4.

	housing – approximately 46 hectares.
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7.7 A Sustainability Appraisal undertook an assessment of the options against the Sustainability Appraisal Framework to help identify the potential for beneficial and adverse outcomes and enable a comparison of the options to be made. The Sustainability Appraisal concluded that Option 2, delivery of 11,200 housing units was the most sustainable target option to plan for. It concluded that although two of the target options would result in greater amounts of housing, these options would result in significant losses of employment land and open space and have significant adverse impacts against a range of SA objectives. The potential for adverse impacts was found to be lower with the lowest housing target option (Option 1); however the amount of housing achieved with this option was considered to be well below that as assessed as required, achieved the lowest beneficial impacts against the SA housing objective compared to other options and was not recommended to be pursued. Appendix 3 provides a summary of the Sustainability Appraisal for the housing target options.

7.8 The preferred housing delivery scenario maximises development opportunities from within the built up area whilst retaining a strong base of employment sites and affords continued protection for the city’s open space resource. It includes the strategic allocation of 46.7 ha of greenfield land at Toad’s Hole Valley on the northern edge of the city for a mixed use development including a substantial amount of new housing (700 units). The preferred housing target is almost exactly the same as that set out in the submission version of Core Strategy (the then South East Plan target of 11,400 new homes).

7.9 There was considerable support for the preferred housing target of 11,200 homes expressed through formal consultation stakeholder events and formal written responses³⁷ as part of public consultation on the Policy Options Paper for Housing Delivery (see Appendix 4 for an analysis of representations received).

³⁷ See Consultation Statement published on Policy Options Papers Consultation October – December 2011.

8. Justification for Preferred Housing Target

8.1 Historically, housing provision targets set for Brighton & Hove have not been directly driven by demographic projections of housing demand/need. It has been accepted (at former East Sussex Structure Plan and South East Plan Examinations) that there are significant constraints on the capacity of the city to physically accommodate significant housing growth particularly in terms of physical and environmental characteristics such as the sea to the south and the South Downs (now a National Park) surrounding the city to the east, west and north.

8.2 The South East Plan examination and approval process (2006 – 2009) accepted that in a tightly constrained urban area like Brighton & Hove, it would not be possible to accommodate the full extent of demographically driven housing demand. It also recognised that there needed to remain a balance between development opportunities for housing, employment provision and economic growth. Environmental constraints were a further barrier to expansion. As a result, the South East Plan housing target for the city was essentially ‘capacity driven’ and was based on estimates of future housing potential to be achieved through (then) existing planning consents, planned allocations and a significant proportion of projected ‘windfall’ development.

8.3 These conclusions were also true for the wider Sussex Coast sub-region of which Brighton & Hove is part. The Housing Duty to Co-Operate study (GL Hearn, 2013) identifies that levels of South East Plan housing provision across the Sussex Coast sub-region were 27-30% below demographic projections³⁸. As indicated in the study, a review of the South East Plan preparation process identifies a number of key implications which remain equally relevant to the process of setting housing targets today:

- A recognition of a constrained land supply given the sub-region’s location and geography between the sea and a (now) National Park, a protected landscape, with an area between which is already intensely developed;
- An emphasis on maximising urban capacity within Brighton & Hove with potential for higher density development given the constrained land supply. However, as the study notes, the continued achievability of this is currently restricted by market circumstances;
- A level of housing provision which did not meet objectively assessed needs based on a continuation of existing levels of in-migration;
- A spatial distribution strategy that was strongly driven by supply-side issues in regard to urban capacity and the potential of different parts of the sub-region to accommodate sustainable urban extensions.

8.4 As noted earlier in this paper, the 2013 Housing Duty to Co-Operate Study also undertook a review of residential land supply and capacity in each local authority area including environmental, landscape and infrastructure

³⁸ See Figure 4 and paras 3.36 – 3/39, Housing Duty to Co-Operate Study, GL Hearn, 2013.

constraints to consider the balance between potential supply and demand. In terms of Brighton & Hove, the study notes the urban area is bounded by the sea and the South Downs National Park; is a relatively intensely developed urban area, with much higher development densities than in the other parts of the sub-region. It acknowledges that land supply is significantly influenced by the geography of the area and the city is tightly constrained and does not have a significant legacy of derelict or brownfield sites³⁹. The study concludes that land supply in the city is ‘clearly restricted’ and that this is primarily a function of the city’s geography and constraints⁴⁰. The study also acknowledges:

‘The City Council has demonstrably sought to consider all potential sources of supply in the development of the City Plan Part 1, including the potential for development of employment land and open space for housing, and sites within the urban fringe. The evidence base suggests limited capacity from these sources; although some has been identified and the Plan proposes the strategic allocation of a strategic site within the urban fringe at Toads Hole Valley’ (paragraph 5.102).

8.5 The Sustainability Appraisal process (as outlined in the section above) strongly supports a housing target that maximises the city’s ‘capacity’ for additional housing development whilst also maintaining a strong base of employment sites and the continued protection of the city’s open space resource and heritage assets. The SA identifies that there would be significant, long-term and permanent costs to the city associated with higher housing target options mainly due to the loss of employment sites and the loss of open space sites impacting on job growth and the local economy, potentially increasing the need for out-commuting, and also potentially reducing the potential for beneficial outcomes for health and deprivation. For both Option 3 and Option 4 the SA concludes that the positive aspects in terms of additional housing delivery would be outweighed by the negative impacts associated with the loss of employment sites and open space (see Appendix 3).

8.6 The City Plan approach to housing land supply promotes the efficient and effective use and development of sites across the city in seeking to maximise development potential. Policy CP14 on Housing Density sets minimum residential density targets of 100 dwellings per hectare within the identified Development Areas and 50 dwellings per hectare elsewhere. These densities are significantly higher than those expected in other parts of the sub-region. CP12 recognises that there are appropriate opportunities and areas of the city which have the potential for taller buildings.

8.7 The City Plan housing target of 11,300 additional homes⁴¹ over the plan period 2010 – 2030 as set out in Policy CP1 is therefore the most sustainable housing target for Brighton & Hove given the city’s other

³⁹ Paragraphs 5.80 – 5.81, Housing Duty to Co-Operate Study, GL Hearn, 2013.

⁴⁰ Paragraph 5.101, Housing Duty to Co-Operate Study, GL Hearn 2013.

⁴¹ The slightly higher figure of 11,300 relative to Option 2 at the Policy Options stage of plan preparation is due to SHLAA updates.

significant development requirements, the need to protect and enhance the city's high quality built and natural environments and the need to support the transition to a low carbon future in a changing climate. The housing target is therefore justified in terms of national policy set out in the NPPF taken as a whole and in terms of guidance for plan preparation set out at paragraph 14.

8.8 The housing target is set as a minimum target for housing delivery and implies an annual average of 565 units per annum. This is similar to but slightly higher than the average rate of housing development achieved over the last 15 years (see Appendix 5: Residential Completions); a timescale which spans both a prolonged period of housing boom and, more recently, a downturn in the housing market.

8.9 Appendix 5 illustrates the cyclical nature of housing delivery and how it tends to replicate economic cycles more generally. The average levels of residential development recorded over a 5, 10, 15 and even 20 year period do not indicate that levels of house building at the scale indicated by the full 'objectively assessed need' range are sustainable over the full plan period.

8.10 In accordance with the emphasis in the NPPF for positive plan-making, the housing provision target is based primarily (95%) on identified sources of housing supply (specific sites and broad locations). The target does however include a minimal allowance for development from future small scale windfall delivery (5% overall) towards the end of the plan period. This approach is considered compatible with the NPPF and the SHLAA good practice guidance. In reality, windfall development will continue to contribute towards housing provision over the entire plan period⁴². Therefore, development from windfall site delivery will serve to either supplement the city's overall housing supply or it will provide an important contingency measure of supply should there be an element of non-delivery from identified sites. This should help ensure housing delivery during a period of market recovery.

8.11 The Housing Requirements Update Study (October 2012) indicates the likely population and employment growth associated with the potential housing trajectory over the plan period⁴³. Under the housing trajectory projection⁴⁴, the city's population is projected to increase by about 8% (compared to 10% under a full, unconstrained, housing requirements scenario) a population increase of about 21,000 people from 2010 – 2030 and a household increase of 10% or 12,600 more households. In terms of employment growth, the study indicates that the housing trajectory could support employment growth of approximately 10% over the plan period (compared to 12% under a full requirements scenario).

⁴² Historically, small site development has consistently contributed at least 30% of total housing delivery in the city, see Appendix 5.

⁴³ See paragraphs 2.26 – 2.31 and Section 3 of 2012 Housing Requirements Study Update, October 2012.

⁴⁴ The potential housing trajectory as set out in the 2012 HRS includes a windfall allowance over the full plan period, see paragraphs 2.26 – 2.31.

9. Duty to Cooperate

9.1 The fact that the City Plan housing delivery target (11,300) is less than the objectively assessed full housing need requirement over the Plan period to 2030 means that there is a 'duty to co-operate' with the city's neighbouring local authorities to address this issue.

9.2 Brighton & Hove's strategic housing market and travel to work areas extend westwards incorporating Adur and parts of Worthing District; eastwards incorporating parts of Lewes, Eastbourne and Wealden Districts and northwards to Mid Sussex, Horsham and Crawley. It is acknowledged that many of these areas also face similar challenges in meeting their own housing requirements.

9.3 The council has been actively engaged with its neighbouring authorities throughout the preparation of the City Plan to address a range of strategic planning issues and whether a shortfall in the city's planned housing provision could be met elsewhere. The Housing Duty to Co-Operate Study (GL Hearn, 2013) reviews the objectively assessed housing needs of the local planning authorities within the Coastal Sussex sub-region and reviews planned levels of housing provision.

9.4 A Duty to Co-Operate Compliance Statement and Statement of Common Ground has been published alongside this paper. This gives full details of the council's actions and outcomes to date with regard to a range of strategic planning matters including the provision of housing over a sub-regional area.

10. Managing housing delivery over the Plan Period

10.1 Housing delivery over the plan period is illustrated through a ‘housing trajectory’. The housing trajectory indicates the rate at which new residential development is anticipated to be delivered over the plan period. This trajectory is regularly reviewed (at least annually) to track both progress in housing delivery and to reflect local housing market conditions.

10.2 The council’s **Housing Implementation Strategy⁴⁵ (HIS)** published as Annex 3 to the Submission City Plan illustrates the housing trajectory position and provides further information regarding the management of housing supply over the full plan period.

10.3 With reference to the 2012 SHLAA Update, the ‘Housing Duty to Co-Operate Study’ (GL Hearn, 2013) sought to review the city’s housing land supply position and the analysis identifies some key factors:

- *The city’s land supply is primarily brownfield and therefore not particularly reliant on Local Plan allocations. Housing completions in the city averaged 449 dwellings per annum between 1996 – 2001, then rose to an average of 677 per annum over the 2001-6 period. They have since fallen back with average completions of 510 homes per annum between 2006 – 2012. Nearer 300 homes per annum have been delivered a year between 2010 – 2012. The housing trajectory and housing supply policies assume recovery to delivery of over 640 dwellings from 2014 and that this can be sustained for a decade or more.*
- *Achievement of this is reliant on improved housing market conditions and particularly improvements in issues affecting viability of flatted development (which is influenced by a number of issues – including constraints in accessing mortgage finance, higher finance costs and willingness of banks to lend, and alternative use values). However, there are positive signs emerging that mortgage finance constraints are starting to ease; and demand and values for student bedspaces remains strong.*
- *The supply figures include a windfall allowance for development post 2024. Given the nature of land supply in the city, it does seem entirely reasonable that windfall sites will make a substantial contribution to land supply over the plan period to 2030 (paragraph 5.87).*

10.3 The analysis concludes:

‘Overall, whilst there are some risks to delivery of the housing trajectory, we would regard it as ambitious but potentially achievable’ (paragraph 5.89).

10.4 Elsewhere, the study notes:

⁴⁵ Housing Implementation Strategy, December 2012, BHCC

‘The strength of house prices and rental demand in the city could well support a stronger and quicker recovery in the market in the City than in a number of other parts of the region’ (paragraph 5.88).

10.5 A 2013 SHLAA Update and reviewed housing land supply position will be provided to assist the Public Examination of the City Plan. Ahead of this, taking account of the comments cited from the study summarised above together with a consideration of representations made at the Publication stage regarding housing delivery, a review of the 2012 housing trajectory has been undertaken and is provided as Appendix 6. The amended housing delivery trajectory reflects the following key factors:

- The ongoing impacts of economic recession which are continuing to constrain the recovery of the housing market within the city;
- The particular impact this is having on bringing forward the larger development sites within the city;
- The loss of a number of housing sites to student housing proposals for which there is a strong current demand; and
- A revised assessment of annual outputs on identified housing sites.

10.6 The amended housing trajectory indicates that there is sufficient overall ‘capacity’ within the city to meet the planned housing requirement (11,300) to 2030. Housing delivery over the first ten years of the plan period (up to 2019/20) may remain below the average delivery rate achieved over the last 15 years (550 units, see Appendix 5) reflecting the ongoing impacts of economic recession; the very low completions achieved 2010 – 2012 and further time required for market recovery. Rates from 2014 to 2019 are anticipated to steadily increase towards an average of around 500 – 550 units per annum⁴⁶. Between 2019/20 and 2024 delivery rates are expected to increase more rapidly with delivery coming through from a number of the city’s larger development sites which will make a major contribution towards housing supply. For the period 2019/20 – 2030 as a whole, delivery from identified sites is likely to average around 630 units per annum. Development from small windfall sites and other sources of windfall (e.g. changes of use from office to residential through permitted development rights) is anticipated to supplement this supply.

Five year housing land supply position

10.7 Taking account of the revised housing trajectory and the key factors which have been impacting upon housing delivery in the city as outlined above, it is possible to establish what a realistic five year land supply requirement for the city might be (see Appendix 7 and 8). Appendix 7 illustrates a table of ‘ramped’ or staggered housing delivery rates which reflect the revised housing trajectory and can be used to calculate rolling 5 year supply delivery requirements. Such an approach makes realistic provision for the process of market recovery and reflects the fact that recovery (particularly

⁴⁶ This is particularly so given ongoing small site development and windfalls from permitted development rights from office to residential conversions.

for flatted forms of development) may take longer than previously anticipated. This approach is considered a more realistic and pragmatic basis against which to calculate ongoing five year housing land requirements. The more standard approach of calculating an ‘annualised’ (flat rate) residual plan requirement across the period to 2030 is not considered appropriate as it would set an unrealistically high delivery requirement particularly for the early plan years.

10.8 The 5 year land supply position is therefore set out as at Appendix 8. This demonstrates that, for the 2012 – 2017 five year period there is a sufficient 5 year supply of housing in accordance with NPPF requirements and a 5% buffer.

11. Housing Mix and Housing Need (City Plan Policies CP19 and CP20)

11.1 As well as achieving an appropriate scale of new housing development (in terms of the housing provision target and planned location of new housing), the council also gives a high priority to the importance of achieving a good mix and choice of housing (in terms of housing type, size and the tenure of accommodation) over the plan period.

11.2 City Plan policy CP19 provides a framework to ensure a good mix of housing is able to be achieved over the plan period. This includes the need to address the city's need for more affordable housing (Policy CP20); the need for more family sized housing; housing options suitable for the elderly and disabled, housing for smaller household types, for student housing and also the need to address the accommodation requirements of travellers (see also City Plan policies CP21 Student Housing; CP22 Gypsy and Traveller Accommodation and SA6 Sustainable Neighbourhoods). There is also a need to encourage active living for all age groups and for developments to be inclusive, adaptable and accessible (policies CP18 Healthy City and CP12 Urban Design).

11.3 Part 2 of the City Plan will develop further policies designed to address the specific housing requirements of particular groups.

11.4 The city's Strategic Housing Market Assessment (SHMA, 2008)⁴⁷ together with the subsequent Brighton & Hove Housing Requirement Studies (2011 and 2012 Update)⁴⁸ indicate that a range of factors are likely to influence both the demand and need for different housing types and sizes.

11.5 These include the profile of the existing housing stock; housing affordability within the city; demographic changes (the scale of population and household growth and changes to the age structure); the quality of place; the local economy in terms of its influence on income and labour demand and the general accessibility of the city in terms of its relationship to other employment locations.

11.6 In terms of the city's current housing offer, 2011 Census data indicates that 83% of the housing stock is in private ownership (approximately 53% owner occupation and 30% private rented⁴⁹) with the affordable housing stock accounting for around 16 % which while below the national average (18.5%) is slightly above the South East average (14.8%)⁵⁰.

⁴⁷ Brighton & Hove Strategic Housing Market Assessment SHMA, DTZ April 2008.

⁴⁸ Brighton & Hove Housing Requirements Study June 2011, Supplementary Papers: Implications of Demographic Change on Demand for Homes in Brighton & Hove (March 2012) and Demographic Implications of the Housing Trajectory (March 2012) and Housing Requirements Study Update October 2012.

⁴⁹ 2011 Census Data, Table KS402EW Tenure. Privately Rented includes 28% privately rented from a landlord or lettings agency and 1.5% privately rented from other source.

⁵⁰ 2011 Census Data, Table KS402EW Tenure.

11.7 The city has a particular concentration of flats, maisonettes and apartments which account for 50% of the city's total housing stock (compared to 21% for the South East) and a low proportion of detached (10%) and semi-detached (19%) housing (28% and 28% respectively for the South East for detached and semi-detached)⁵¹. Terraced homes account for 21% of the city's housing stock (22% for the South East).

11.8 The bias towards smaller flats and terraced homes is not dissimilar to that found in many other cities and urban areas. In Brighton and Hove it is likely to reflect the historic pattern of development that has taken place in the city (in terms of the many large seafront terraces that lend themselves to conversion); the city's constrained land supply and, in more recent times, the impact of higher house prices, intense affordability pressures and a lack of available large development sites. Taken together, these factors have encouraged the development of higher density forms of housing in more recent years⁵².

11.9 In terms of the local population, demographic information indicates that the city has a relatively young population, with population growth over the last 20 years concentrated in the 15-44 age groups⁵³. Average household size is relatively small (2.25)⁵⁴ and there are significant levels of single person (single pensioner and other single adults) households which account for 36% of all households. Family-type households with dependent children comprise about 25% of the city's households. Couple households comprise 17% of the city's households⁵⁵.

11.10 Looking ahead over the next 20 years, the city's population will continue to be focused on households aged in their 20s, 30s and 40s. Changes in the population structure will also occur as the population ages. Population growth is likely to be strongest in those people aged 50-69 (as the current population aged in their 30s, and 40s gets older). The school age population is expected to grow (reflecting current high levels of births) and the population over retirement age will increase but with the largest increases affecting those people in their late 60s.⁵⁶

11.11 However, the relationship between household type and size and dwelling size is not a straightforward one. The profile of households in an area does not necessarily translate directly into the types and sizes of property to be provided. In the market sector, households are able to buy or rent any size or type of property subject to what they can afford. Therefore the size of housing which households occupy relates more to their wealth and age rather

⁵¹ 2011 Census Data, Table KS40IES Dwellings

⁵² See 2008 SHMA, Section 6, para. 6.5 and Housing Requirements Study Update October 2012, para. 4.36

⁵³ 2008 SHMA, para. 4.9 and Housing Requirements Study 2011 Executive Summary,

⁵⁴ Housing Requirements Study Update, October 2012, para. 2.52

⁵⁵ Based on 2011 Census data. Table KSI05EW. A combination of other household types account for the remaining %.

⁵⁶ Para. 1.13, Figure 1.6, Demographic Implications of the Housing Trajectory, GL Hearn, March 2012 and Housing Requirements Update October 2012, Figures 3.4 and 3.5

than the number of people which they contain. Whilst 1 and 2 bed dwellings are almost exclusively lived in by small households, significant numbers of larger properties accommodate just one or two person households which indicates significant levels of ‘under-occupancy’⁵⁷.

11.12 A demographic analysis of the demand/ need for homes in the city over the plan period⁵⁸ indicates that an estimated 58% of the overall need/demand (for both market and affordable homes) will be for one and two bedroom properties (24% and 34% respectively); with 42% for three and four-plus bedroom properties (31% and 11% respectively).

11.13 In terms of the demand for market housing, the greatest demand is likely to be for 2 and 3 bedroom properties (35% and 36% respectively); while for affordable housing the majority of the requirement is likely to be for one and two bedroom homes (46% and 33% respectively) although there is also likely to be a considerable requirement for three or more bedroom sized properties⁵⁹.

11.14 Evidence of a ‘bias’ towards smaller dwelling types within the city’s housing stock is also reflected in terms of the pattern of recent residential development in the city. This points towards a lack of ‘choice’ across the housing market in terms of property types and sizes available to current and future households and this is particularly so in terms of the availability of larger family sized types of dwellings. However, in practice, the nature of the city’s housing land supply together with land availability constraints are likely to restrict the provision of larger properties. It will be important therefore to maximise opportunities to secure additional family sized housing on suitable sites.

11.15 In response to these circumstances, CP19 indicates that where appropriate (in terms of site suitability and with reference to the characteristics of existing communities/neighbourhoods), the intention will be to secure a wider variety of housing types and sizes through new development to meet the accommodation requirements of particular groups within the city. For larger sites, where new development will make an important contribution to existing communities in terms of regeneration and/or helping to make them more sustainable places to live, site allocations in Parts 1 and 2 of the City Plan may set a required housing mix (in terms of housing type, size and tenure) to be achieved. Similarly, some neighbourhoods may benefit from a more diverse mix of housing in terms of housing type, tenure and sizes of dwellings available. In such circumstances, then the mix of any new housing development will be an important consideration (see also Policy SA6).

⁵⁷ Nationally, about 36% of households under-occupy with slightly higher figures in the South East, see para. 4.9 HRS Update, October 2012

⁵⁸ Housing Requirements Study Update October 2012, para. 4.35 – 4.36

⁵⁹ See Figures 4.9 and 4.11, Housing Requirements Update, October 2012.

Housing affordability and the need for affordable housing

11.16 Housing affordability is a major issue for many residents within the city, particularly for many families and for newly forming households. In the period 1997–2007, average house prices in Brighton & Hove almost tripled. Although there has been some decrease in house prices since their peak in 2007, prices remain relatively high in relation to local incomes.

11.17 New households wishing to enter the market face difficulties not only in having sufficient income to finance a mortgage but also in raising the finance for a deposit and many family households wishing to move to larger properties will face difficulties in financing the additional mortgage needed to purchase a larger family home.

11.18 Current (as at 2012) house price data suggests that a 1-bedroom flat would be unaffordable to those households with average household incomes⁶². On the basis that a property is purchased with 25% deposit and 75% repayment mortgage over 25 years; the average 1- bedroom flat requires a deposit of approximately £44,000 and an annual household income of around £40,000 to purchase. An average 3-bedroom house would require a deposit of around £79,000 and an annual household income of approximately £72,500 to purchase⁶³.

11.19 There is also evidence of affordability problems within the private rented sector⁶⁴. To rent a 1-bedroom flat in the city costs an average of £767 per month (equivalent to the repayments on a mortgage of £131,000) and requires a household income of £40,000. To rent a 3-bedroom house costs an average of £1,358 per month (equivalent to the repayments on a £232,000 mortgage) and requires a household income of £71,500.

11.20 In addition, many households who are in receipt of housing benefit find that a proportion of private rental market properties are unaffordable due to the cost to rent exceeding the local housing allowance limits. This becomes more acute for households needing to rent family homes with the shortfall between housing allowance limits and rental costs increasing as the size of the property needed becomes larger.

11.21 The council's 2012 'Assessment of Affordable Housing Need' Study considers the need for affordable housing within Brighton & Hove over the period 2012 – 2017. It draws upon data from the council's Joint Housing Register, demographic projections and income information. On the basis of assuming no more than 25% of households' gross income is spent on housing costs, the study concludes there is likely to be a net housing need for 17,400

⁶² BHCC Housing Costs Update April to June 2012.

⁶³ BHCC Housing Costs Update: April to June 2012 - average purchase price 1-bed flat £174,647 and 3-bed house £314,207

⁶⁴ BHCC Housing Costs Update: April to June 2012

affordable homes over the 2012 – 2017 period⁶⁵. Given the city's high housing costs, an alternative analysis (based on an assumption that, in reality, many households may spend more than 25% of their income on housing costs; they may spend up to 35% gross household income on housing) indicates a net need for 12,500 affordable homes for the same period⁶⁶.

11.22 The needs evidence suggests a significant need for affordable housing in the city. However, given the current stock of affordable housing in the city, the uncertainties regarding future funding mechanisms for the delivery of new affordable housing and the city's constrained housing land supply it is unrealistic to assume that all housing need can be met through the provision of new affordable homes.

11.23 In practice, it is likely that the city's private rented sector will continue to play an important role in meeting the housing needs of the city. The modelling undertaken in the study cited above indicates that based on current circumstances the private rented sector in the city could meet the needs of 9,200 households over the 2012 – 2017 period⁶⁷.

11.24 When setting targets for the delivery of affordable housing from new development, the city council considers the most pragmatic approach is to require that all new residential development (as defined with reference to the site size thresholds set out in Policy CP20) provides a viable and deliverable proportion of affordable housing or (where appropriate) an equivalent financial contribution in lieu of onsite provision which can be pooled to help enable the further provision of affordable housing elsewhere in the city.

11.25 Recommendations set out in the council's most recent Affordable Housing Development Viability Study⁶⁸ support a sliding scale approach to affordable housing delivery targets. Policy CP20 Affordable Housing aims to achieve onsite provision of affordable housing on all suitable larger development sites (40% on sites of 15 units or more); 30% on sites of between 10 and 14 units and a financial contribution equivalent to a lower target quota of 20% on smaller development sites of between 5 and 9 units. The 2012 Affordable Housing Viability Study indicates clearly the need for flexibility in applying these targets and the need to take into account detailed viability considerations in the negotiation process so that housing delivery is not adversely affected. Policy CP20 provides for a flexible application of the affordable housing delivery targets where considerations indicate this is justified.

⁶⁵ Assessment of Affordable Housing Need, GL Hearn, December 2012. See Section 9, Housing Needs Assessment.

⁶⁶ Both estimates take account of future affordable supply from re-lets and affordable housing schemes in the development pipeline.

⁶⁷ See Section 10, Assessment of Affordable Housing Need, GL Hearn, December 2012.

⁶⁸ Affordable Housing Development Viability Study, March 2012.

12. Conclusion

12.1 This paper demonstrates that the council has an up to date, proportionate and robust evidence base and can demonstrate a clear understanding of the city's housing requirements both in terms of the scale of housing likely to be required and the mix of housing in terms of housing type and size and the range of tenures likely to be required over the plan period.

12.2 The council's housing delivery strategy seeks to boost significantly the supply of housing delivered in the city over the plan period to 2030 and has sought to maximise housing delivery so far as is consistent with other key strategic priorities and development needs of the city. This approach accords with government planning guidance for achieving 'sustainable development' as set out at paragraph 14 and 47 of the NPPF.

12.3 The approach to housing delivery as set out in the Proposed Submission City Plan is therefore considered 'sound' in terms of the NPPF soundness tests for plan preparation. As summarised in the introduction to this paper:

- a. The plan has been **positively prepared** and has sought to meet objectively assessed housing requirements so far as is reasonable to do so and consistent with achieving the overall aim of 'sustainable development' as set out in the NPPF. The evidence base, explored in detail in this paper, indicates that it would not be feasible to plan to meet the full extent of the city's objectively assessed housing need without incurring 'significant adverse impacts' when assessed against the policies of the NPPF taken as a whole.
- b. As a consequence, the housing provision target and delivery strategy set out in the plan is fully **justified** and represents the most appropriate delivery strategy, when considered against the reasonable alternatives and based on proportionate evidence.
- c. The housing delivery strategy is **effective** and deliverable over the plan period to 2030. A five year supply of housing can be demonstrated and the HIS identifies a series of management actions and measures to ensure a five year supply can be maintained. The strategy has also addressed joint working on cross-boundary strategic priorities.
- d. The housing delivery strategy is **consistent with national policy** and will enable the delivery of sustainable development in accordance with the policies set out in the NPPF.

APPENDICES

Appendix 1

Strategic Housing Market Assessment (SHMA) ‘Core Outputs’ (government guidance requirements)

Requirement of SHMA Guidance	How this is met in 2008 SHMA	Update Studies Undertaken
Estimates of current dwellings in terms of size, type, condition, tenure.	Provided in Section 6	Estimate of current dwellings and size available through 2001 Census and BHCC residential completions data. Further release of census data will update this. 2011 Census data now available on accommodation type and tenure as at December 2012.
Analysis of past and current housing market trends, including balance between supply and demand in different housing sectors and price/affordability. Description of key drivers underpinning the housing market.	Provided in Section 3, 4. 5. Demographic drivers, economic drivers, supply.	GL Hearn: Brighton & Hove Housing Requirements Study, June 2011 and October 2012 Update plus GL Hearn study re. Assessment of Affordable Housing Need December 2012 updates all of this work.
Estimate of total future number of households, broken down by age and type where possible.	Provided in Sections 4 and 10.	GL Hearn Housing Requirement Studies (2011 and 2012) update the number of households and growth over plan period. Population data by age/sex structure. 2011 Census data for breakdown of household types – available December 2012.
Estimate of current number of households that will require affordable housing.	2005 HNS reported in Section 7	Assessment of Affordable Housing Need, GL Hearn (December 2012)
Estimate of future households that will require affordable housing.	2005 HNS reported in Section 7	Assessment of Affordable Housing Need, GL Hearn (December 2012)
Estimate of future households that will require market housing	Section 10 provides evidence of future household types and the implications for the dwelling requirements. Overall housing requirement considered in the Draft SE Plan and this reviewed in Section 9	GL Hearn: Brighton & Hove Housing Requirements Study June 2011 and October 2012 Update establishes up to date scale of housing requirements; demand for market and affordable housing. Coastal Sussex

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		Housing Duty to Co-Operate Study (2013) establishes objectively assessed housing needs for market and affordable housing.
Estimate of the size of affordable housing required	2005 HNS reported in Section 7 and Section 10. Analysis of waiting list and re-let data to understand need for different dwelling sizes.	GL Hearn Brighton & Hove Housing Requirements Study June 2011 and October 2012 GL Hearn work on Assessment of Affordable Housing Need December 2012
Estimate of household groups who have particular housing requirements e.g. families, older people, key workers, black and minority ethnic groups, disabled people, young people, etc.	Section 8. Also Sections 2,4,6 and & provide evidence on particular household groups.	Evidence regarding specific housing requirements is available from authority's Housing Strategy, e.g. need for Extra Care Housing, Retirement Housing, Adaptations. Student Housing Strategy Traveller Strategy Some data available through 2011 Census.

Appendix 2

Urban Fringe Assessment: Updated September 2012.

NB: Shaded sites are those where the Proposed Submission City Plan proposes a change to the built up area boundary to incorporate sites within the city’s built up area (see sites 13, 22, 23 and 24).

Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
1	681	NP	Oakdene, Former school site, Southwick Hill, Portslade.	4	1.2	0	0	<ul style="list-style-type: none"> Prominent location, adjacent to South Downs National Park. Part of the setting of Southwick Hill; adverse impacts likely.
2	172	NP	Land west of Mile Oak Road, Portslade.	3	2.5	30	30	<ul style="list-style-type: none"> Lower part of site would have less impact on Southwick Hill. Designated Site of Nature Conservation Importance (NC4). Land subject to grazing tenancy. Nitrate vulnerable zone. SNCI mitigation required.
3	683	NP	Oakdene, Upper Paddocks South wick Hill Portslade.	4	1.2	0	0	<ul style="list-style-type: none"> Exposed site and adjacent to the South Downs National Park/ Southwick Hill. Designated Site of Nature Conservation Importance NC4.
4	168	NP	Site at Mile Oak Road,	4	2.3	0	0	<ul style="list-style-type: none"> Prominent location at highest

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
			Portslade.					(eastern) part of site which is also steeply sloping part of Mile Oak Hill.
4a	1004	NP	Site at Mile Oak Road, Portslade.	3	0.1	12	30	<ul style="list-style-type: none"> Lower western part of field may be suitable for some housing as topography better and potential impacts improved.
5	685	NP	Mile Oak Hill, Portslade.	4	6.9	0	0	<ul style="list-style-type: none"> Prominent and exposed hill top location in view of South Downs National Park.
6	686	NP	Mile Oak Allotments (entrance near Gorse Close), Portslade.	4	2.6	0	0	<ul style="list-style-type: none"> Statutory Allotments, 69 plots well used with waiting list. Part of site is a designated Site of Nature Conservation Importance – NC4.
7	687	NP	Foredown Allotments, Thornbush Crescent (north end), Portslade.	4	2.3	0	0	<ul style="list-style-type: none"> Statutory Allotments, 24 plots well used with waiting list.
9	688	NP	Land at Hangleton Bottom, Portslade.	4	3.1	0	0	<ul style="list-style-type: none"> Site is designated for waste development in adopted Waste Local Plan. Site is not available for

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								residential use unless alternative waste site identified.
10	690	NP	Benfield Hill, Benfield Valley, Portslade.	4	5.6	0	0	<ul style="list-style-type: none"> • Open space. • Designated Benfield Valley Site of Nature Conservation Importance, NC4. • Archaeologically Sensitive Area HE12. • BHL P NC9 identified Benfield Valley as an important green wedge into urban area; well used by general public for outdoor recreation, contains significant wildlife habitats. • Restrictive covenants.
11	691	NP	Benfield Valley, north of Hangleton Lane, Portslade.	4	8.7	0	0	<ul style="list-style-type: none"> • Open space. • Benfield Barn Conservation Area. • Designated Benfield Valley Site of Nature Conservation Importance, NC4. • Part Archaeologically Sensitive Area HE12. • BHL P NC9 identified Benfield Valley as an important green wedge into urban area; well used

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								<p>by general public for outdoor recreation, contains significant wildlife habitats.</p> <ul style="list-style-type: none"> • Restrictive covenants.
12	692	NP	Benfield Valley, south of Hangleton Lane, Portslade.	4	10.7	0	0	<ul style="list-style-type: none"> • Open space. • Designated Benfield Valley Site of Nature Conservation Importance, NC4. • BHL P NC9 identified Benfield Valley as an important green wedge into urban area; well used by general public for outdoor recreation, contains significant wildlife habitats. • Restrictive covenants.
13	732	H&K	Toads Hole Valley, King George VI Avenue, Hove.	3	46.7	700	50 approx	<ul style="list-style-type: none"> • Bowl shaped topography lends itself to some development. • Site of Nature Conservation Importance on western edge of site; requires improvement. • Access requires improvement. • Site large enough to secure well planned development gains for city.

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
14	693	Stan	Three Cornered Copse bounded by Dyke Road Ave, King George VI Ave, Brighton.	4	6.9	0	0	<ul style="list-style-type: none"> • Adjacent to National Park boundary. • Wildlife corridor from the Downs to Hove Park. • Steep gradient; topographical constraints. • Access difficult; heavily used junction. • Part Archaeologically Sensitive Area (HE12). • Site of Nature Conservation Importance NC4. • Popular site for quiet outdoor recreation. • Woodland Drive Conservation Area.
15	695	Pat	A27/A23 Interchange (includes site east of Patcham Court Farm), Brighton	4	1.2	0	0	<ul style="list-style-type: none"> • Access constraints; surrounded by busy dual carriageway, no access, very congested at peak times. • Site isolated and not suitable for housing.
16	697	Pat	Horsdean Allotments and	4	5.7	0	0	<ul style="list-style-type: none"> • Statutory Allotments – well used.

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
			Recreation Ground Patcham, Brighton					<ul style="list-style-type: none"> • Prominent views along A27 and visible from National Park. • West facing bank is Archaeologically Sensitive Area (HE12). • Sports field and recreation area.
17	698	Pat	(part of) Ladies Mile, Carden Avenue, Brighton	3	16.8 (whole area)	12		<ul style="list-style-type: none"> • Ladies Mile Local Nature Reserve (NC3). • Archaeologically Sensitive Area – part of Romano British landscape (HE12). • Ridge of unimproved grassland. Strong visual connectivity with wider Downs. • Playing field on southern edge associated with Patcham High School. • Estimate of units based on small part of site near to existing properties at western edge. • Disused play area at western edge of site.
18	699	H&S	Hollingbury Park	4	20.1	0	0	<ul style="list-style-type: none"> • Roedale Valley statutory

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
			Recreation Ground, Ditchling Road, Brighton					<p>allotments (216 plots) well used.</p> <ul style="list-style-type: none"> • Mixed open space uses – school pitches, sports pavilion and court, children’s play area, wooded area and allotments in steep ravine. • Site lies adjacent to South Downs National Park. • Part of proposed Local Nature Reserve.
19	700	H&S	Lower Roedale Allotments and playing fields, Lynchet Close, Brighton	4	7.0	0	0	<ul style="list-style-type: none"> • Lower Roedale Allotments, statutory allotments well used (122 plots). • Playing fields and grounds associated with Cedar Close school. • Proposed Local Nature Reserve.
20	701	H&S	Hertford School grounds and sports ground, Lynchet Close Brighton.	4	1.6	0	0	<ul style="list-style-type: none"> • Playing fields associated with Hertford School. • Proposed Local Nature Reserve. • Archaeologically sensitive area (HE12).

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
21	169	H&S	Land to North East of Coldean (adjacent to halls of residence), Brighton	4	3.4	0	0	<ul style="list-style-type: none"> • Prominent and steeply sloping site on south west facing bank. • Archaeologically Sensitive Area (HE12). • Part of site might be suitable for some student accommodation rather than for general residential. • Access difficulties unless via Halls of Residence.
22	703	H&S	North Field, University of Sussex, Falmer Brighton.	4	4.4	0	0	<ul style="list-style-type: none"> • Not available for general residential. Already in Sussex University's plans for student accommodation. • Provides open space for University. • HE11 Stanmer Historic Park and Garden. • Site surrounded by National Park.
23	704	H&S	Tenant Lain University of Sussex, Lewes Road, Brighton.	4	5.5	0	0	<ul style="list-style-type: none"> • Within University Masterplan for redevelopment of accommodation. Not available for

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								general residential. <ul style="list-style-type: none"> • Site surrounded by National Park.
24	705	H&S	Village Way North, Lewes Road, Falmer, Brighton.	4	3.6	0	0	<ul style="list-style-type: none"> • No longer available. Community Stadium built.
25	706	H&S	Brighton University Playing Fields a - off Lewes Road, Brighton	4	3.4	0	0	<ul style="list-style-type: none"> • University Sports fields. • In university masterplans for more intensive sports use. • Not available.
26	707	H&S	Brighton University Playing Fields b – Lewes Road, Brighton	4	9.3	0	0	<ul style="list-style-type: none"> • University Sports fields. • In university masterplans for more intensive sports use. • Not available.
27	708	M&B	Brighton Borough Cemetery, Bear Road (North) Brighton	4	9.2	0	0	<ul style="list-style-type: none"> • Not suitable; in use as a cemetery. • Part of proposed Local Nature Reserve (NC3)
28	709	H&EG	Brighton Borough Cemetery, Bear Road (South), Brighton	4	39.1	0	0	<ul style="list-style-type: none"> • Not suitable; in use as a cemetery. • Part of proposed Local Nature Reserve (NC3)

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								<ul style="list-style-type: none"> • Historic Park and Garden (HE11)
29	710	M&B	Land to west of Land & Buildings at South Downs Ridings School, Bear Road, Brighton	4	4.3	0	0	<ul style="list-style-type: none"> • Site in prominent hill top position adjacent to National Park. • Steeply sloping site. • Proposed Local Nature Reserve (NC3)
30	712	EB	Brighton Race Course	4	47	0	0	<ul style="list-style-type: none"> • Mixed uses – Brighton Race Course (major sporting venue), open space, recreation grounds and Allotments. • Local Nature Reserve (NC3) • Scheduled Ancient Monument • Lower end Archaeologically Sensitive Area (HE12) • Race Hill Allotments (Wilson Ave) well used.
31	711	EB	Whitehawk Allotments, Whitehawk Hill Road, Brighton	4	8.9	0	0	<ul style="list-style-type: none"> • Mixed open space uses; allotments, playing fields and countryside. • Local Nature Reserve (NC3) • Whitehawk Hill Allotments (119 plots) well used. Walpole Road Allotments (35) well used. • Whitehawk Camp – Scheduled

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								<p>Ancient Monument.</p> <ul style="list-style-type: none"> • Whitehawk Hill is part of ridge that dominates the East Brighton Landscape. Horseshoe of steep, east facing slopes.
32	175	EB	Land and Buildings at South Downs Riding School.	4	2.0	0	0	<ul style="list-style-type: none"> • Prominent location highly visible adjacent to National Park. • Telecommunications Mast on northern part of site. • Proposed Local Nature Reserve.
32a	1003	EB	Reservoir site	4	0.4	0	0	<ul style="list-style-type: none"> • Prominent location • Not available.
33	715	Woo	Land north of (Ingleside Stables), Warren Road, Woodingdean, Brighton	4	5.2	0	0	<ul style="list-style-type: none"> • Prominent location; highly visible adjacent to National Park. • Currently in use as stables which led to exclusion from SDNP.
34	713	EB	Sheepcote Valley, Wilson Avenue, Brighton	4	43.1	0	0	<ul style="list-style-type: none"> • Informal Open Space • Site of Nature Conservation Importance • Former landfill affects large parts of area together with exclusion zone. Not suitable for residential. • Wilson Avenue Household Recycling centre to south.

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
35	714	EB	East Brighton Park and Sports Ground, Wilson Avenue, Brighton	4	32.8	0	0	<ul style="list-style-type: none"> Formal Park and Sports Fields.
36	718	Woo	Lawns Memorial Park burial grounds and fields south of Warren Road, Brighton	4	14.9	0	0	<ul style="list-style-type: none"> Prominent site with strategic views over downs adjacent to National Park. Mixed open space uses; memorial burial grounds and open fields to south of Sussex Nuffield Hospital and to rear of Downs View School.
37	717	RC	Roedean Miniature Golf Course, Marine Drive, Brighton	4	17.5	0	0	<ul style="list-style-type: none"> Prominent site on downland cliffs, setting of the city. Archaeologically sensitive area (HE12) Outdoor Recreational facility.
38	179	RC	Land north of Bulstrode Farm, Ovingdean Brighton	3	1.5	10		<ul style="list-style-type: none"> Opportunity to improve land area with small amount of residential. Ovingdean Conservation Area?
39	720	RC	Land at Bulstrode Farm / Ovingdean Farm, Ovingdean, Brighton (includes former chicken sheds)	3	2.4	10		<ul style="list-style-type: none"> Opportunity to improve land area with small amount of residential. Ovingdean Conservation Area?
40	719	RC	Land east of Greenways,	4	1.2	0	0	<ul style="list-style-type: none"> Forms part of Ovingdean

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
			Ovingdean Brighton					Conservation Area (HE6) <ul style="list-style-type: none"> • Within Grade 1 listed St.Wulfrans Church (HE3) • In mixed open uses; allotments and some grazing.
41	721	RC	Wanderdown Road Open Space, Wanderdown Road, Brighton	4	2.6	0	0	<ul style="list-style-type: none"> • Prominent site but isolated from wider downland. • Site of Nature Conservation Importance. • Archaeologically sensitive area to north of site (HE12)
42	722	RC	Land adjacent to Ovingdean Road and Falmer Road.	4	5.5	0	0	<ul style="list-style-type: none"> • Open site adjacent to National Park. • Used for horse paddocks to north and playing fields for school to south.
43	723	RC	Land to rear of Longhill Road, Ovingdean Brighton	4	3.5	0	0	<ul style="list-style-type: none"> • Open space; some private associated with adjacent residential properties. • Ownership constraints. • Significant Access constraints
44	724	RC	Allotments to west of The Green, Rottingdean Sheep Walk of Neville Road, Brighton	4	2.3	0	0	<ul style="list-style-type: none"> • Windmill Hill Allotments; well used with waiting list. • Part of site within Beacon Hill Local Nature Reserve.

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations
								<ul style="list-style-type: none"> Part within Rottingdean Conservation Area.
45	1001	RC	Rear of Bishopstone Drive / Falmer Road.	4	1.3	0	0	<ul style="list-style-type: none"> Open and exposed site adjacent to National Park.
46a	1000	RC	Former Nursery site, land west of Saltdean Vale, Saltdean, Brighton	3	1.0	10		<ul style="list-style-type: none"> Disused nursery used for caravan storage. Public Bridleway may be constraint as required for access.
46	727	RC	Land west of Saltdean Vale, Saltdean Brighton	4	3.0	0	0	<ul style="list-style-type: none"> Football pitches – Saltdean Football Club. Access is via public bridleway.
47	178	RC	Land & Buildings at Pickershill, Saltdean Vale, Saltdean, Brighton	4	0.2	0	0	<ul style="list-style-type: none"> Prominent site adjacent to National Park.
48	728/205	RC	Coombe Farm Westfield Avenue North, Brighton	4	5.9	0	0	<ul style="list-style-type: none"> Prominent site adjacent to National Park. Part of site within Coombe Farm SNCI.
49	729	RC	Covered Reservoir – Longridge Avenue, Saltdean Brighton	4	0.6	0	0	<ul style="list-style-type: none"> Open aspect rising land; development would be intrusion into wider downland. Telecommunications Mast on corner of site.

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Urban fringe Ref.	SHLAA Site Ref.	Ward	Site Address	Code 3 or 4	Site Area	No. of units	Density	Planning Constraints / Considerations

Code 3 = some potential for housing

Code 4 = not considered suitable for housing

Appendix 3

Summary of Sustainability Appraisal for Housing Delivery Options

Issue: Delivery of housing in Brighton & Hove.

Option 1: 9,800 new homes for period 2010-2030 (490 per annum).

- All housing will be accommodated within existing built up area of the city.

Option 2: 11,200 new homes for period 2010-2030 (560 per annum).

- Development of a greenfield site, Toads Hole Valley, on the northern edge of the City for a mixed use development with approximately 700 units of housing.
- Mixed use development on some employment sites required.
- Some development at Shoreham Harbour.

Option 3: 13,500 new homes for period 2010-2030 (675 per annum).

- Development of a greenfield site, Toads Hole Valley required
- Mixed use development on some employment sites required.
- Loss of 11.5ha of the City's employment sites to housing required (equivalent to 8-14 employment sites).
- Loss of up to 23ha of open space to housing required.
- Some development at Shoreham Harbour.

Option 4: 15,800 new homes for period 2010-2030 (790 per annum).

- Development of a greenfield site Toads Hole Valley required.
- Mixed use development on some employment sites required.
- Loss of 23ha of the City's employment sites to housing required (equivalent to 16-28 employment sites).
- Loss of up to 46ha of open space to housing required.
- Some development at Shoreham Harbour.

Appraisal methodology

The general method used for assessment is as follows:

Positive impact	+
No impact	0
Negative impact	-
Uncertain impact	?
Mixed impact	-/+
Positive or negative uncertain	-/+?

In addition to the basic scoring system, as there are four options for consideration, a scoring system which uses up to four "+" symbols or four "-" symbols has been used to help indicate the performance of the option relative to others.

Table of anticipated impacts

SA Objective	Biodiversity	Improve Air Quality	Maintain local distinctiveness	Protect South Downs NP	Housing provision	Reduce car transportation	Water pollution	Water consumption	Land remediation	Coastal flooding
Option 1	-?	-	-	0	+	-	-	-	?	-
Option 2	--?	--	-- /+?	--	++	--	--	--	?	--
Option 3	---?	---	---	--	+++	---	---	---	+?	--
Option 4	----?	----	----	--	+++ +	----	----	----	+?	--

SA Objective	Employment	Ec. Development	Improve Health	Integrate safety	Reduce Deprivation	Community Engagement	Make best use of PDL	Climate change mitigation	Climate change adaptation	Meeting CSH /BREEAM	Accessibility	Waste reduction
Option 1	+	+	++	+	+++?	+	++ +	-	-	-	+	-
Option 2	++	++	++++	+	+++?	++	++	--	--	-	- /+	--
Option 3	--	--	+	+	+?	+++	+	---	---	-	-	---
Option 4	---	---	+	+	+?	+++	+	---	----	-	--	----

Summary of impacts

Option 1

This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health, community safety, reducing deprivation, engaging communities, making the best of previously developed land and improving accessibility.

This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, transport, water pollution, water consumption, coastal flooding, energy consumption, adapting to climate change, meeting environmental standards and reducing waste.

This option is considered to have uncertain impacts on the objective relating to promoting the development of contaminated land.

Option 2

This option is considered to have positive impacts on objectives relating to housing, employment and economy, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land.

This option is considered to have negative impacts on objectives relating to biodiversity, air quality, the South Downs, transport, water pollution, water

consumption, coastal flooding, energy consumption, adapting to climate change, meeting environmental standards and reducing waste.

This option is considered to have mixed (positive and negative) impacts on objectives relating to maintaining local distinctiveness and improving access. This option is considered to have uncertain impacts on the objective relating to promoting the development on contaminated land

The positive results for the housing, health, employment and economic development objectives are considered to be of significance, and the negative results for the biodiversity, South Downs, water pollution and climate change objectives are also considered to be of significance.

Option 3

This option is considered to have positive impacts on objectives relating to housing, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land. The impact on health is less positive than that associated with options 1 and 2, and this is considered to be of importance.

This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, the South Downs, transport, water pollution, water consumption, coastal flooding, employment, economic development, energy consumption, adapting to climate change, meeting environmental standards, improving access and reducing waste.

This option is considered to have potential for positive but uncertain impacts on the objective relating to promoting the development of contaminated land. The positive result on the housing objective is considered to be of significance. The negative results on the biodiversity, maintaining local distinctiveness (open space), South Downs, water pollution, employment, economic development, air quality, transport and objectives are considered to be of significance.

Option 4

This option is considered to have positive impacts on objectives relating to housing, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land. The impact on health is less positive than that associated with options 1 and 2, and this is considered to be of importance.

This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, the South Downs, transport, water pollution, water consumption, coastal flooding, employment, economic development, energy consumption, adapting to climate change, meeting environmental standards, improving access and reducing waste.

This option is considered to have potential for positive but uncertain impacts on the objective relating to promoting the development on contaminated land. The positive result on the housing objective is considered to be of significance. The negative results on the biodiversity, maintaining local distinctiveness (open space), South Downs, water pollution, employment, economic development, air quality, transport and objectives are considered to be of significance.

Overall Summary and comparison of options

Option 1: This option is likely to result in fewer significant negative impacts than other options, however it would also result in fewer significant positive impacts, particularly in relation to the housing objective, as will result in the lowest amount of housing delivered. The housing target is well below the amount as assessed as required to meet local future needs, and is also below the amount tested through the South East Plan process as capable of delivering considering the environmental constraints of the city. As the delivery of housing is the main aim of this policy, this option is not recommended to be pursued.

Option 2: There are three objectives where this option has potential for most significant positive impact compared to other options, including the objectives relating to employment and the economy, as this option will provide employment opportunities at construction stage and does not include loss of entire employment sites. The positive impact relating to health is also of significance. This option will result in provision of housing and employment opportunities, both of which are wider determinants of health. This option will also prevent the loss of employment opportunities that will be associated with total loss of employment sites and prevent the loss of other open spaces in the city, which will also have positive impacts on health. In addition, the type of housing delivered on the Greenfield site is more likely to be family type housing, which there is a shortage locally and may also increase provision of useable open space in that location. Although this option will not result in the highest amount of housing, the target is similar to the South East Plan target which was tested as being achievable considering the environmental constraints of the city.

There are four objectives where this option has the potential for significant negative impact, although the impacts are not considered to be as significant as the impacts associated with Options 3 and 4. These are the biodiversity, the South Downs, water pollution and adapting to climate change objectives. The risk of negative impacts on these objectives is mainly due to the development of a Greenfield site. It is considered that the impacts on biodiversity could be mitigated through features to enhance the local environment, and that sustainable drainage systems could be used to prevent the risk of water pollution and the city's ability to adapt to climate change. However the landscape impact on the South Downs National Park may be permanent and difficult to mitigate against. This option is also likely to result in negative impacts on air quality and transport, mainly due to the amount of housing developed but also due to the lack of existing sustainable transport provision for the Greenfield site. The impacts on air quality and transport are not considered to be as significant as those associated with Options 3 and 4 which may result in out-commuting due to loss of employment sites.

Although this option has potential for negative impacts, some of which may be significant, it has potential for more significant positive impacts than other options and is the recommended option to be pursued for Housing Delivery. This option would require further investigation to clarify potential impacts and

substantial mitigation, particularly in relation to the Toads Hole Valley Site, would be required. See recommendations.

Option 3:

There are no objectives where this option outperforms any of the other options either in terms of having greater potential for positive impact or a greater potential for negative impact.

The results against the housing objective are considered to be significant, and this option will deliver more housing than Option 1 and 2, although less than Option 4. However, achieving this housing target would come at significant cost to the city, with increased risk of adverse impacts when compared to Options 1 and 2, mainly due to the loss of employment sites and sites of open space.

The negative impacts anticipated on the employment and economic development objectives through the loss of employment sites are considered to be significant, long-term and permanent. The loss of employment sites is also likely to increase the likelihood of other negative impacts, for example by increasing numbers of journeys made and worsening air quality, as may result in increased out-commuting. The loss of employment sites and sites of open space both impact on the objectives relating to health and deprivation, with the results for health being less positive than they are with Options 1 and 2, despite this option delivering more housing. The loss of employment sites and loss of sites of open space go against the recommendations in the Employment Land Study 2009 and the Open Space Sports and Recreation Study 2008/09.

The loss of open space associated with Option 3 is also likely to result in greater significant negative impacts than Option 2 on biodiversity, maintaining local distinctiveness, pollution of water resources and adaptation to climate change. The negative impact on the South Downs is considered to be equivalent to that of Option 2.

Although Option 3 would result in a higher amount of housing than Options 1 and 2, the significance of the negative impacts associated with this option, particularly on the objectives relating to employment, economic development, health and the city's ability to adapt to climate change are considered to outweigh any potential housing gains. This option is not recommended to be pursued for Housing Delivery.

Option 4:

This option resulted in the most significant positive impact on the housing objective as this option had the highest housing target. However, there are ten objectives where this option has the strongest negative impact compared to other options, of which the negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, transport, water pollution, employment, economic development, and adaptation to climate change are considered to be of high significance for reasons outlined under Option 3. In addition, and as outlined under Option 3 above, the impact of this

option on the health objective performs the poorest of all options, as the positive aspects of housing delivery have been outweighed by the negative impacts associated with loss of employment sites and sites of open space.

Although this option would result in the highest amount of housing, this would come at great economic, environmental and social cost. This option is therefore not recommended to be pursued for Housing Delivery.

Preferred option

Option 2

Recommendations for preferred option

- All housing should incorporate features to benefit biodiversity whether situated on brownfield sites, Greenfield sites or existing employment sites.
- Housing, particularly when situated within the built up area, should incorporate features to reduce car ownership, e.g. a number of car-free units, provision of car-club membership, increased number of car-club vehicles.
- All housing, but particularly high density tall buildings, should be in regard to the local characteristics of the surrounding neighbourhood and should consider the setting of the historic, built and natural environment.
- All housing should incorporate provision of open space to accommodate the needs of the future population.
- Any mixed use development on employment sites should aim to maintain the former amount of employment floorspace by intensifying development on the site to accommodate housing.
- All housing should incorporate SUDS to minimise the risk of surface water flooding and pollution to groundwater.
- All housing should meet required standards of SPD08 Sustainable Building Design, particularly in terms of water and energy consumption.
- Construction job opportunities should be provided for local people, particularly where sites are situated within areas of deprivation.
- All housing should incorporate features to help adaptation to climate change.
- All housing should ensure construction and demolition waste is minimised and that appropriate waste management features are maximised in development.

Additional Recommendations for housing delivered on urban fringe site

- An ecological survey to assess the biodiversity value of the site required to enable significance of impact of development on biodiversity to be understood/anticipated. This should be undertaken prior to any proposals for development are submitted.
- Biodiversity value of the site should be increased through mitigation e.g. through development of substantial natural features that attract local wildlife, and should be reflective of and integrate the natural surrounding habitats.

- Impact assessment on value of SNCI should take place to ensure designation is not compromised. Development should secure enhancements to SNCI to facilitate improvements.
- Impact assessment on the setting of the SDNP should be undertaken to ensure that any development does not compromise the designation, including views of and from the SDNP.
- Improvements to the Greenway should be secured and options to link the site to the adjacent SDNP should be investigated.
- Screening of the development should take place to reduce noise and visual impact on surrounding communities.
- Open space should be provided, particularly of the typologies which are deficient in this area.
- Investment in public transport is required to link the site to existing local services.
- Housing should be of low density and should include a high proportion of traditional family type housing.
- Development of the site would need to incorporate substantial SUDS to mimic the role the sites plays in terms of absorbing surface water.
- Opportunities for district heating throughout the site should be maximised.
- Development should be complemented with essential services for the local community, including health services and local shops, including access to food.
- The site should be assessed for any potential mineral deposits and any useful top-soils and sub-soils stored and re-used on site where possible and other excavation wastes re-used.

Appendix 4: Analysis of Representations on Housing Target Options

43 formal written representations in total

Preferred Option 2

- a. Comments of Support** **22 (52%) comments of support;**
 14 (33%) clear support ;
 8 (19%) partial support
- b. Objections** **7 (16%) comments**
- c. Blank/ General**
 Comments **14 (33%) comments**

	Key Comments	Respondent Examples
<p>Preferred Target Option 2: 11,200</p> <p>Including Toads Hole Valley Strategic Allocation.</p> <p>22 (52%) respondents express support (14 clear expressions of support; 8 partial support)</p>	<ul style="list-style-type: none"> • Support for a balance between housing provision and opportunities for economic growth to ensure city does not become a dormitory settlement for other major employment locations (e.g. Crawley, London). • Recognition that because the city is tightly constrained it cannot achieve the full extent of projected housing requirements. • Recognition of city’s historic assets in terms of architecture and green spaces. • Need to explore wider geographic and economic functional area to help achieve this – through ‘duty to cooperate’. • Development should be ambitious in terms of development standards and making 	<p>Brighton & Hove Economic Partnership, City Employment and Skills Steering Group, Brighton Housing Trust, Brighton & Hove Bus Company, Brighton Society, Hove Civic Society, Adur District Council; NCLA, Roedean Residents Association, CPRE Brighton & Hove District, Kemp Town Society, Kingsway and West Hove Society, Kingscliffe Society, JW Cook Estates Ltd & Pecla Investments, a number of individuals, City Sustainability Partnership.</p>

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	<p>best use of site at Toads Hole Valley. Could be scope for more housing.</p> <ul style="list-style-type: none"> • Question amount of public space required at THV given proximity to National Park and adjacent accessible SNCI. 	
<p>Options 3 and 4 13,500 15, 800</p> <p>3 representations clearly support Options 3 or 4. 1 implies support for Option 4.</p>	<ul style="list-style-type: none"> • The City Plan should aim to meet housing requirements in full. Preferred Options approach is ‘constraints based’ and therefore flawed. • The preferred option underestimates the capacity of the city’s urban sites, some sites could deliver more, eg. at Marina (Inner Harbour). • Preferred option does not address how shortfall of requirements will be addressed through duty to cooperate. 	<p>Hargreaves – Option 4 X Leisure – Option 3 National Grid Properties Ltd – Option 3 Mid Sussex DC – implies Option 4</p>
<p>Option 1: 9, 800</p> <p>1 representation supports Option 1.</p>	<ul style="list-style-type: none"> • Lowest growth option supported – least impact on the conservation and enhancement of the South Downs – and object to Toads Hole Valley inclusion. 	<p>South Downs Society</p>
<p>General Comments (some object to preferred option 2; others are general and state no alternative preference).</p>	<ul style="list-style-type: none"> • Welcome the recognition that higher housing numbers present particular challenges in terms of retention of green, amenity, habitats space (Natural England). • Investment in water supply infrastructure will be planned for whatever housing option adopted. Some concerns regarding capacity of WWTW at Shoreham (Southern Water). • Purpose built student accommodation offers a positive contribution to housing supply in Brighton; more purpose built student accommodation frees up housing for general market 	

	<p>use (Unite Group Plc).</p> <ul style="list-style-type: none">• If Toads Hole Valley is to be developed then it should be to the highest quality; support Biosphere bid; be zero and carbon and neutral in water impact; maximum use of site should be made (B&H FoE).• Lower quotas for housing; use redundant houses (Individual)• Representations from Marine Gate Action Group - will continue to resist the estimated output of 1,000 dwellings at Brighton Inner Harbour. Soundness concerns re. SHLAA with regard to capacity of Marina, Black Rock and Gas Works sites.• Would like to see more information on type, form of housing to be developed; criteria for new housing will vary with locations of the city; acknowledge that densities likely to increase over the next 20 years (Brighton Society)• Suggested additional urban fringe sites for future consideration (Collins Planning Services)• Policies should encourage optimum use of existing housing stock (Regency Society)• Like to see a commitment to high quality design and consideration of townscape in all aspects of City Plan (Regency Society).• Plan needs to be visionary - needs to be a good city vision – areas of the city need complete re-design to bring us into step with other modern cities (individual).• Need for a robust and realistic approach to the delivery of homes in the city's part of Shoreham Harbour (Kingsway and West Hove Residents Association).• Concern regarding any taller buildings – adverse impacts of past development (Montpelier and Clifton Hill Association).• How does option 2 scenario compare with that modelled in the 2009 version of the Brighton & Hove TA (Highways Agency).
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Appendix 5

Table A: Total Residential Completions in Brighton & Hove 1991/2 – 2011/12

Year	Residential Completions	5 year average
1991/2	837	791
1992/3	430	
1993/4	1017	
1994/5	441	
1995/6	1229	
1996/97	458	449
1997/98	496	
1998/99	423	
1999/00	407	
2000/01	459	
2001/02	960	677
2002/03	608	
2003/04	684	
2004/05	602	
2005/06	539	
2006/07	797	510
2007/08	567	
2008/09	721	
2009/10	380	
2010/11	283	
2011/12	309	
Total (21 years)	12647	602

BHCC Residential Monitoring.

Average of last 5 years	452
Average of last 10 years	549
Average of last 15 years	549
Average of last 20 years	590

Table B: Residential Completions by large and small sites

	Large (6+)	Small (<6 units)	Total
2001/2	636	324	960
2002/3	250	358	608
2003/4	522	162	684
2004/5	388	214	602
2005/6	226	313	539
2006/7	515	282	797
2007/8	410	157	567
2008/9	572	149	721
2009/10	269	111	380
2010/11	131	152	283
2011/12	138	171	309

Source: BHCC residential monitoring

Small site development (all) :

Last 5 year annual average = 148

Last 10 year annual average = 207

Table C: Small Windfall Site Development – by type of development

Year	New Build	Conversions	Changes of Use	Conversions and Changes of Use	Total
2000/1	28	21	71	92	120
2001/2	72	100	152	252	324
2002/3	94	131	133	264	358
2003/4	56	57	49	106	162
2004/5	53	117	44	161	214
2005/6	100	154	59	213	313
2006/7	84	144	54	198	282
2007/8	51	70	36	106	157
2008/9	42	63	44	107	149
2009/10	34	37	40	77	111
2010/11	n/a	n/a	n/a	n/a	152
2011/12	n/a	n/a	n/a	n/a	171
Total					2513

Source: BHCC, Residential Monitoring. n/a = not available.

Average 2002/3 – 2011/12 (10 Years) = 207

Average 2007/8 – 2011/12 (5 Years) = 148

Type of development on small sites (10 Years)

New Build = 28%

Conversions = 41%

Changes of Use = 31%

Conversions and Changes of Use = 72%.

Small windfall (pdl) allowances:

70% small site development arises from changes of use/conversions (pdl)

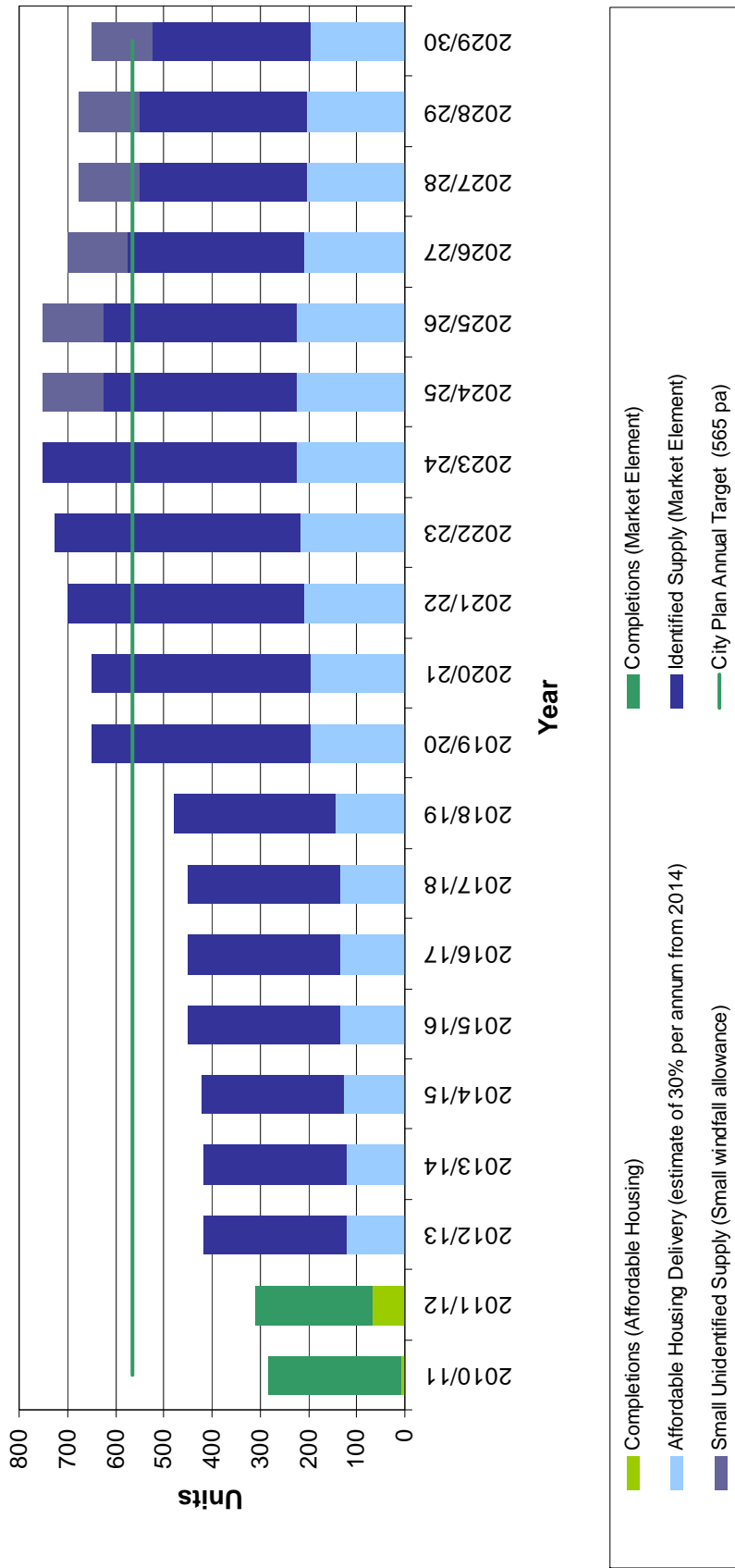
70% 148 = 104

70% 207 = 145

Mid point between 104 - 145 = **125**

Appendix 6

Housing Trajectory Revised Position 2012



Appendix 7

Managed Housing Delivery – Ramped Delivery Requirements

Year	Annual Delivery	Average over phased period	Cumulative Delivery over period 2012 - 2030
2010/11	283 Actual delivery		
2011/12	309 Actual delivery		592
2012/13	420		
2013/14	420	840 (420)	1432
2014/15	500		
2015/16	500		
2016/17	500		
2017/18	550		
2018/19	550	2600 (520)	4032
2019/20	650		
2020/21	650		
2021/22	700		
2022/23	700		
2023/24	700	3400 (680)	7432
2024/25	700		
2025/26	650		
2026/27	650		
2027/28	650		
2028/29	600		
2029/30	600	3850 (642)	11,282

Appendix 8: 5 Year Housing Land Supply

a) 2012 – 2017 Five year land supply requirement calculation

	Delivery rate expected
2012/13	420
2013/14	420
2014/15	500
2015/16	500
2016/17	500
Total	2340
Annual average requirement 2012 - 17	468
5% NPPF buffer	24
Annual requirement with 5% buffer	492
5 Year land supply requirement 2012 - 2017	2460

b) 2012 – 2017 Land Supply

	Supply
2012-2014 Identified Supply (see note 1)	839
2014-2017 Identified Supply (see note 2)	1349
Small site windfall (pdl) development allowance (see note 3)	250
Other 'windfall' allowance (see note 4)	225
Total Supply	2663
Years' Supply	5.4

Source: 2012 SHLAA – Trajectory Review

Note 1: 'Pre-Plan Adopt' Supply, Summary Table E (1431 – 592 completions for 2010 – 2012).

Note 2: 1 - 5 Year Supply (2248) divided by 5, multiplied by 3.

Note 3: Small site windfall allowance – see Appendix 5

Note 4: Other windfall, e.g. pdr change of use from office to residential at 75 units per annum over 3 years.



**Brighton & Hove
City Council**