Compiled by the Planning Policy, Projects & Heritage Team at Brighton & Hove City Council

# **Housing Provision Topic Paper**

October 2019



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#### 1. Introduction

- 1.1 This Topic Paper has two main purposes.
  - To summarise the current housing delivery position against the City Plan housing provision target which aims to deliver at least 13,200 new homes over the plan period 2010-2030; and
  - ii) To show how the site allocations proposed in City Plan Part Two (CPP2) will contribute to meeting the City Plan housing target.

### 2. Background

#### a) Housing provision in the City Plan

- 2.1 City Plan Part One (CPP1) includes strategic policies which set the overall amount of new housing to be built across the city over the period 2010-2030 and identifies the broad locations where major housing development will take place. City Plan Part Two (CPP2) seeks to develop this strategic framework, by identifying and allocating further sites for new housing to enable the delivery of sufficient new housing to meet the overall City Plan housing target.
- 2.2 CPP1 Policy CP1 (Housing Delivery) commits the Council to make provision for at least 13,200 new homes to be built over the plan period 2010 2030. Part B of the policy indicates the broad distribution of housing and that this provision is to be delivered from a variety of sources including:
  - i) 6,005 dwellings to be delivered within eight 'Development Areas' (DAs) identified in Policies DA1 – DA8, which are expected to provide for the majority of housing, employment and retail development in the city – this figure includes a minimum of 3,635 dwellings on strategic site allocations identified for housing and mixed uses in Policies DA1 – DA8.
  - ii) 4,130 dwellings on other sites within the city's built up area.
  - iii) 1,060 dwellings on greenfield sites on the urban fringe based on information in 2014 and 2015 Urban Fringe Assessments this figure is additional to the greenfield allocation at Toads Hole Valley in Policy DA7.
  - iv) 765 dwellings on small identified sites with outstanding planning permission for 5 or less dwellings.
  - v) 1,250 dwellings through small windfall development based on an allowance for developments of 5 or less dwellings likely to come forward on currently unidentified sites over the plan period.
- 2.3 Table 1 below indicates the breakdown and broad distribution of housing provision set out in Policy CP1.

Table 1: Policy CP1 Housing provision and sources of supply

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

- 2.4 Policy CP1 also states that the release of land/sites for new housing will be managed so that it delivers the broad amount and distribution of housing as set out above. It further states that the adequacy of housing delivery (in terms of a five year supply of housing and in meeting planned housing delivery targets over the full plan period) will be assessed regularly in accordance with the Housing Implementation Strategy and through annual reviews of the Strategic Housing Land Availability Assessment (SHLAA), with progress reported through the council's Authority Monitoring Report (AMR).
- 2.5 Part A d) of Policy CP1 indicates that the council will allocate additional sites in CPP2 to help ensure that housing delivery is maintained over the plan period.

#### b) Updated information on housing land supply

2.6 The council's most recent comprehensive assessment of housing land supply is set out in the Strategic Housing Land Availability Assessment (SHLAA) Update 2019<sup>2</sup>. That report provides data on housing completions up to 31 March 2019, progress on developments with extant planning permissions and strategic sites allocated in CPP1. The SHLAA also identifies other sites without planning permission that are considered deliverable or developable within the next 15 years based on an assessment of their

<sup>&</sup>lt;sup>1</sup> The figures in the table total 13,210 dwellings against the policy target of at least 13,200 new homes.

<sup>&</sup>lt;sup>2</sup> Strategic Housing Land Availability Assessment (SHLAA) Update 2019

- availability, suitability and achievability in accordance with the National Planning Policy Framework (NPPF) and planning practice guidance (PPG).
- 2.7 The SHLAA is updated and published annually. This data also forms the basis for the Brownfield Land Register (BLR)<sup>3</sup> which provides a published list of all previously developed (brownfield) sites of 0.25 hectares/5 or more dwellings that are considered suitable, available and achievable for housing development.
- 2.8 It is accepted that the rate of housing delivery since the start of the City Plan period has fallen short of the projected CPP1 target. This has largely been due to general housing market conditions in the city and because development timescales for a number of CPP1 strategic allocations have been longer than was assumed in the CPP1 housing trajectory. The council has prepared a Housing Delivery Action Plan (HDAP)<sup>4</sup> which provides an overview of housing delivery in the city, assesses the main barriers and constraints to housing delivery, and sets out actions which the council is undertaking to help improve delivery in the future. The HDAP analysis indicates that housing delivery is likely to improve within the next 2-3 years, taking account of the amount of housing development now under construction or with planning permission. The report also identifies a range of council actions to boost housing delivery, including through accelerating its own direct delivery of affordable housing and by taking action to unlock stalled development sites.

#### c) Site allocations in City Plan Part Two

- 2.9 The council's approach to identifying and selecting sites for allocation in CPP2 is set out in detail in a separate Site Allocations Topic Paper<sup>5</sup>. The work undertaken for the Draft CPP2 included further detailed assessment of sites identified in the SHLAA to assess whether they are suitable for allocation for housing and/or mixed uses (including housing). Following this analysis, the majority of SHLAA sites which did not already have planning permission (and some with permissions not yet started) were proposed for allocation in the Draft CPP2 which was subject to consultation over the period July to September 2018.
- 2.10 A number of SHLAA sites were not allocated in the Draft CPP2 for various reasons. In most cases, this was because they were in current active use (e.g as commercial premises) and therefore it is uncertain if or when they may come forward for housing. In addition, small SHLAA sites with potential for under 10 dwellings have not been allocated in CPP2.
- 2.11 Since the Draft CPP2 consultation, the council has made some amendments to the proposed site allocations in the Pre-Submission CPP2 taking account of

<sup>&</sup>lt;sup>3</sup> Brownfield Land Register 2019

<sup>&</sup>lt;sup>4</sup> Housing Delivery Action Plan (August 2019)

<sup>&</sup>lt;sup>5</sup> CPP2 Site Allocations Topic Paper (Nov 2019)

representations submitted in response to the consultation in Summer 2018 and/or updated information relating to proposed housing sites. These amendments include:

- The inclusion of some additional site allocations in Policy H1 where new sites promoted in response to the Draft CPP2 consultation have been assessed by the council as suitable for housing or mixed use housing development.
- Adjustment of indicative housing site numbers for some existing CPP2 allocations based on updated information provided by landowners/site developers or following planning permissions granted since the Draft CPP2 consultation.
- Removal of housing allocations for sites where development is now well underway and therefore allocation in CPP2 is no longer considered necessary.
- Removal of sites which are no longer considered available for residential development due to planning permission granted for alternative uses or updated information about landowner intentions.
- 2.12 In total, CPP2 is proposing allocations for a minimum of 3,600 dwellings. This includes a combined total of 1,100 dwellings on four strategic sites (Policies SSA1 SSA4), 1,570 dwellings on housing and mixed use sites within the existing built-up area (Policy H1) and 930 dwellings on greenfield 'urban fringe' sites (Policy H2). Table 2 below provides a breakdown of housing delivery from the proposed allocations in CPP2.

Table 2: Proposed site allocations in the Pre-Submission CPP2

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

#### 3. Assessment of Housing Delivery against the City Plan Target

3.1 Appendix 1 presents a series of summary tables setting out the current housing delivery position for each of the broad sources of housing supply identified in Policy CP1. The different sources of supply are examined individually below. All the figures presented are based on residential development monitoring as at 1 April 2019.

#### a) Large Identified Sites (6+ dwellings) in Development Areas

- 3.2 Policy CP1 identified a total housing potential of 6,005 net dwellings to be delivered across the eight Development Areas (DA1 DA8) identified in CPP1.
- 3.3 Table A1.1 presents an updated assessment of housing delivery from the Development Areas, showing the expected delivery from different sources of housing supply as set out below. A full schedule of housing sites in the Development Areas is provided in Appendix 2.
  - i) 837 net dwellings already completed over the period 2010-2019.
  - ii) 1,347 dwellings under construction on sites of 6+ net dwellings under construction at April 2019.
  - iii) 727 dwellings on sites of 6+ dwellings with planning permission but not yet commenced at April 2019.
  - iv) 1,942 dwellings on strategic sites allocated in CPP1 which have not yet achieved planning permission. This figure includes only 500 of the minimum 1,000 dwellings allocated at the Brighton Marina Inner Harbour (Policy DA2.1) as the remaining 500 dwellings are now anticipated to be delivered after the end of the Plan period in 2030.
  - v) 1,043 dwellings on sites without planning permission that are proposed for allocation in CPP2. This figure includes strategic allocations for a minimum 500 dwellings at Sackville Trading Estate/Coal Yard (Policy SSA4) and a minimum 100 dwellings at the Combined Engineering Depot, New England Road (Policy SSA2), with the remaining dwellings on other sites proposed for allocation within the Built-Up Area (Policy H1).
  - vi) 255 additional dwellings expected to come forward on the CPP1 strategic allocation at the Gas Works site, which is allocated for a minimum 85 dwellings in CPP1 Policy DA2, however an updated site assessment has indicated potential to deliver 340 dwellings.
  - vii) 21 dwellings on sites identified in the SHLAA with identified potential for 6-9 dwellings. These sites fall below the threshold of 10 or more net dwellings which the council has adopted for allocating sites in CPP2, but are not included in the small site windfall allowance which covers sites of 5 of less dwellings (see below).
- 3.4 Taking account of the proposed site allocations in CPP2, the estimated housing supply from the Development Areas totals 6,172 net dwellings, which would exceed the CP1 provision figure by 167 dwellings. Looking at the individual DAs, the

identified housing supply is now well above the CP1 figure for the Hove Station Area (DA6) and New England Quarter/London Road (DA4), but is below the CP1 figure in both the Brighton Marina/Black Rock area (DA2) and Lewes Road Area (DA3). The identified supply for the other DAs is similar to the projected CP1 figures.

#### b) Large Identified Sites (6+ dwellings) in the Rest of the City

- 3.5 Policy CP1 identified a total potential housing figure of 5,190 net dwellings on large sites of 6+ dwellings across the Rest of the City (i.e outside the DAs). This included 4,130 net dwellings within the Built Up Area and a further 1,060 net dwellings on greenfield sites to be allocated on the Urban Fringe.
- 3.6 Table A1.2 presents an updated assessment of housing delivery from the Rest of the City, showing the expected delivery from different sources of housing supply as set out below. A full schedule of housing sites in the Development Areas is provided in Appendix 3.
  - i) 1,675 net dwellings already completed over the period 2010-2019.
  - ii) 703 dwellings under construction on sites of 6+ net dwellings under construction at April 2019.
  - iii) 1,054 dwellings on sites of 6+ dwellings with planning permission but not yet commenced at April 2019.
  - iv) 400 dwellings on the King Alfred/RNR strategic allocation in CPP1 (Policy SA1)
  - v) 1,065 dwellings on sites without planning permission that are proposed for allocation in CPP2. This figure includes 605 dwellings within the existing Built-Up Area and 466 dwellings on Urban Fringe sites (Policy H2).
  - vi) 100 additional dwellings expected to come forward on the King Alfred/RNR strategic allocation (giving a revised site total of 500 dwellings) this is based on updated developer information and site assessment undertaken for the SHLAA Update 2017 and Brownfield Land Register.
  - vii) 256 dwellings on sites identified in the SHLAA with identified potential for 6-9 dwellings.
- 3.7 Taking account of the proposed site allocations in CPP2, the estimated housing supply in the Rest of the City totals 5,253 net dwellings, which exceeds the CP1 provision figure by 63 dwellings. The identified supply is 185 net dwellings above the CP1 figure in the Built Up Area, but 122 net dwellings below the CP1 figure for the Urban Fringe.
- 3.8 It should be noted that the site allocations in both CPP1 and CPP2 set minimum

housing numbers, which provides potential for the figures on allocated sites to be exceeded when planning permissions are granted.

#### c) Small Sites (5 or less dwellings)

- 3.9 Policy CP1 identified a total potential housing figure of 2,015 net dwellings to be delivered on small sites of 5 or less dwellings. This included 765 net dwellings on small sites already identified (developments which had been completed and those with planning permission), plus an allowance for a further 1,250 net dwellings to come forward on small windfall sites yet to be identified.
- 3.10 Table A1.3 shows that 1,321 net dwellings have been completed on small sites over the period 2010-2019 (averaging 147 net dwellings per year). In addition, a total of 146 net dwellings are under construction and a further 186 are projected to be delivered from planning permissions not yet started (this figure includes a 10% discount for assumed non-implementation).
- 3.11 In addition to small sites already identified, further 1,351 net dwellings are projected to come forward through future small windfall development. As explained in the SHLAA Update 2019, this allowance has been calculated based upon average net housing delivery on small sites over the past five years (2014-2019), which gives an average annual delivery figure of 157 net dwellings. This figure has been projected forward as an annual small windfall allowance for the period 2021-2030. To avoid double counting with small sites that already have planning permission at April 2019, no windfall allowance has been included for the first 2 years (2019-2021) and the small site completions figure for Year 3 has been assumed to include a mix of existing small site permissions (not yet started) and windfall sites not yet identified
- 3.12 Taking account of completions, permissions and windfall, the total supply for small sites is now projected to total 3,004 net dwellings. This is above the figure assumed in Policy CP1 (+989 net dwellings), which reflects the much higher than expected delivery from small sites over the City Plan period to date (2010-2019).

#### d) Other Sources of Housing Supply

- 3.13 The council's assessment of future housing delivery also includes provision from two further sources firstly Prior Approvals for change of use to residential under permitted development rights and secondly the council's Estate Regeneration Programme ('New Homes for Neighbourhoods').
- 3.14 As shown in Table A1.4, there is a total of 306 net dwellings with Prior Approval for change of use to residential (Class C3) under permitted development rights (i.e without the need to apply for planning permission). Following the approach in the SHLAA, a 30% discount has been applied to this figure giving a revised estimate of

- 214 additional dwellings expected to be delivered from this source.
- 3.15 The Estate Regeneration Programme known as New Homes for Neighbourhoods (NHFN) commits the council to deliver at least 500 homes on council-owned land throughout the city. As shown in Table A1.5, a total of 157 dwellings have already been completed with a further 38 dwellings under construction and 12 dwellings with planning permission not yet commenced. In addition, sites for 61 dwellings are proposed for allocation in CPP2. This leaves an outstanding figure of 232 dwellings to achieve the council's minimum target.
- 3.16 A number of additional council owned sites are currently under consideration for housing development under NHFN. Together these have potential to deliver well above 232 additional dwellings. The council is therefore confident that at least 500 dwellings will be delivered through the New Homes for Neighbourhoods programme and the 232 additional dwellings have been included as an additional contribution towards the overall housing provision figure. As additional sites come forward, they will be identified in the annual SHLAA updates.

#### e) Housing supply summary

- 3.17 Table A1.6 summarises the projected housing supply over the City Plan period 2010-2030 from all the sources detailed above. Overall, based on the monitoring position at 1 April 2019, there is identified potential to deliver at least 14,875 net dwellings. This potential housing supply would exceed the CPP1 minimum requirement, providing a degree of headroom that gives greater confidence that at least 13,200 net dwellings will be delivered by 2030.
- 3.18 Table 3 below presents a summary comparison of the projected housing supply against the City Plan (Policy CP1) target for each of the different sources of housing supply identified above.

Table 3: City Plan Part 2 Housing supply position against City Plan target

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

#### 4. Conclusion

- 4.1 As set out in this topic paper, the City Plan (Policy CP1) sets a minimum housing provision target of 13,210 net dwellings to be delivered over the period 2010-2030. The updated assessment of housing delivery set out above, including the proposed site allocations in CPP2, shows potential to deliver 14,875 net dwellings, a surplus of 1,665 dwellings against the City Plan target.
- 4.2 The council is confident that this identified housing figure is achievable by the City Plan end date of 2030. It is accepted that the rate of housing delivery since the start of the City Plan period has fallen short of the projected CPP1 target, however the Housing Delivery Action Plan demonstrates that the council is now committed to a range of actions to boost housing delivery, including by accelerating its direct delivery of affordable housing and by taking action to unlock stalled development sites.
- 4.3 Despite this, housing delivery rates will be to some extent dependent on general housing market conditions and specific landowner/developer actions which are outside the council's control. For this reason, the identification in the SHLAA of housing potential which exceeds the CPP1 requirement provides greater confidence that the minimum CPP1 target will be met. All of the City Plan site allocation policies (both in CPP1 and CPP2) set minimum housing provision figures, which allows potential for housing totals to be exceeded on individual sites when development proposals come forward at the planning application stage subject to assessment in terms of impact on the highways network and other infrastructure.
- 4.4 For these reasons, the council is confident that, with the site allocations proposed in CPP2, there is a sufficient supply of housing to achieve the City Plan provision target.

#### Appendix 1: City Plan Part 2 Housing delivery against City Plan targets

**Table A1.1 - Development Areas** 

Identified supply in Development Areas (6+ units)	CPP1 Housing provision	Completions 2010-2019	Under construction	Planning permission not started	CPP1 allocation without PP	CPP2 allocation without PP	Additional potential in BLR	SHLAA sites (6-9 dwellings)	Total	Position against CPP1
DA1 Brighton Centre & Churchill Square	20	0	0	0	0	0	0	0	0	-20
DA2 Brighton Marina & Black Rock	1,940	195	661	0	585	0	255	0	1,696	-244
DA3 Lewes Road	875	111	416	0	80	43	0	6	656	-219
DA4 London Road area	1,130	388	7	455	267	210	0	9	1,336	206
DA5 Eastern Road / Edward Street	515	25	142	168	110	35	0	0	480	-35
DA6 Hove Station	525	89	0	0	200	567	0	0	856	331
DA7 Toads Hole Valley	700	0	69	0	700	0	0	0	769	69
DA8 Shoreham Harbour	300	29	52	104	0	188	0	6	379	79
Development Areas total	6,005	837	1,347	727	1,942	1,043	255	21	6,172	167

Total sites allocated in
CPP2
0
0
43
235
35
567
0
344
1,224

Table A1.2 - Rest of City

Identified supply in the Rest of City (6+ units)	CPP1 Housing provision	•	Under construction	Planning permission not started	CPP1 allocation without PP	CPP2 allocation without PP	Additional potential in BLR	SHLAA sites (6-9 dwellings)	Total	Position against CPP1
Built Up Area	4,130	1,675	703	590	400	599	100	248	4,315	185
Urban Fringe	1,060	0	0	464	0	466	0	8	938	-122
Rest of City total	5,190	1,675	703	1,054	400	1,065	100	256	5,253	63

Total sites
allocated in
CPP2
1,349
930
2,279

Table A1.3 - Small sites (identified + windfall)

Housing supply from small sites (<6 units)	CPP1 Housing provision	Completions 2010-2019	Under construction	Planning permission not started <sup>1</sup>	Small windfall allowance 2021-2030	Total	Position against CPP1
Small identified sites	765	1,321	146	186		3,004	989
Small windfall allowance	1,250				1,351	3,004	909
Small Sites total	2,015	1,321	146	186	1,351	3,004	989

#### Notes

<sup>&</sup>lt;sup>1</sup> Includes an assumed 10% discount for non-implementation of existing planning permissions.

Table A1.4 - Sites with Prior Approval for change of use to residential

Prior Approvals for change of use to residential	CPP1 Housing provision	Prior Approval not started	PA not started (70% disc)
Large sites not yet started	0	288	202
Small sites not yet started	0	18	13
Prior Approvals total	0	306	214

Table A1.5 - HRA Estates Regeneration Strategy (additional potential)

Housing potential from HRA sites	CPP1 Housing provision	Completions 2010-2019	Under construction	Planning permission not started	CPP1 allocation without PP	CPP2 allocation without PP	HRA sites already identified	Additional potential supply <sup>1</sup>
HRA Estates Regeneration sites	0	157	38	12	0	61	268	232
HRA total	0	157	38	12	0	61	268	232

#### Notes

Table A1.6 - Housing supply from all sources 2010-2030

Housing provision by source	CPP1 Housing provision	Completions 2010-2019	Under construction	Planning permission not started	CPP1 allocation without PP	CPP2 allocation without PP	Other potential supply & windfall <sup>1</sup>	Total potential supply	Sites allocated in CPP2
Development Areas	6,005	837	1,347	727	1,942	1,043	276	6,172	1,224
Rest of City	5,190	1,675	703	1,054	400	1,065	356	5,253	2,279
Small sites (identified + windfall)	2,015	1,321	146	186	-	-	1,351	3,004	-
Prior Approval for change of use to residential	0	•	-	214	-	-	-	214	-
HRA Estates Regeneration (additional potenial)	0	ı	•	-	-	•	232	232	-
Total	13,210	3,833	2,196	2,181	2,342	2,108	2,215	14,875	3,503

Notes:

Table A1.7 - City Plan Part 2 - Housing supply position against City Plan target

	CPP1 Housing provision	Total potential supply	Position against CPP1
Development Areas	6,005	6,172	167
Rest of City	5,190	5,253	63
Small sites (identified + windfall)	2,015	3,004	989
Prior Approval for change of use to residential	0	214	214
HRA Estates Regeneration (additional potential)	0	232	232
Total	13,210	14,875	1,665

<sup>&</sup>lt;sup>1</sup> Additional potential supply calculated by subtracting HRA sites completed, with planning permissions or proosed for allocation in CPP2 from New Homes for Neighbourhoods (NHFN) Programme target for delivery of 500 new dwellings. The current NHFN site pipeline provisionally identifies additional sites for at least 250 dwellings, although not all sites are confirmed as suitable.

<sup>&</sup>lt;sup>1</sup> Includes 1) Additional housing potential on CPP1 strategic allocations identified on Brownfield Land Register; 2) Identified SHLAA sites with potential for 6-9 dwellings; 3) Additional potential from small windfall sites (<6 dwellings) over period 2020-30; and 4) Additional potential from HRA New Homes for Neighbourhoods programme.

# Appendix 2 : Housing delivery in Development Areas - Schedule of sites

Site name	Development Area	No. dwellings	Notes
Net completions 2010-2019			
Land at Brighton Marina (Outer Harbour)	DA2 Brighton Marina & Black Rock	195	Part of planning permission for 853 dwellings under
Former Esso Garage Hollingdean Road	DA3 Lewes Road	24	
Covers Yard, Melbourne Street	DA3 Lewes Road	39	
18 Wellington Road Brighton	DA3 Lewes Road	12	
58-62 Lewes Road	DA3 Lewes Road	6	
(RSL site) Ainsworth House Wellington Road	DA3 Lewes Road	17	HRA site
2 Freehold Terrace, Brighton	DA3 Lewes Road	7	
Former Connaught House Site Melbourne Street	DA3 Lewes Road	6	
49-50 Providence Place & 3 & 4 Ann Street	DA4 London Road Area	9	
Open Market, Marshall's Row, London Road	DA4 London Road Area	87	
Block J, Brighton Station Site	DA4 London Road Area	147	
37/38 Providence Place, Brighton	DA4 London Road Area	6	
17-19 Oxford Street	DA4 London Road Area	9	
Shipping containers (part of richardson's scrap	DA4 London Road Area	36	Part of DA4 strategic allocation for 165 dwellings (New
157-159 Preston Road (Former Norwich Union)	DA4 London Road Area	31	Part of DA4 strategic allocation for 450 dwellings (125-163
171 - 173 Preston Road (Prestamex House)	DA4 London Road Area	63	
Stag Inn 33 Upper Bedford Street Brighton	DA5 Eastern Road / Edward Street	9	
33 Mighell Street and 70a Carlton Hill Brighton	DA5 Eastern Road / Edward Street	9	
31-32 High Street Brighton	DA5 Eastern Road / Edward Street	7	
70 and site of Chrome Productions Limited,	DA6 Hove Station	65	
84- 86 Denmark Villas Hove	DA6 Hove Station	24	Part of planning permission for 24 dwellings under
1 Wellington Road, Portslade	DA8 Shoreham Harbour	8	
Britannia House 336 Kingsway Hove	DA8 Shoreham Harbour	6	Part of Policy H1 mixed use site allocation for 90 dwellngs
Britannia House, 332 Kingsway	DA8 Shoreham Harbour	9	Part of Policy H1 mixed use site allocation for 90 dwellngs
107 Boundary Road Hove	DA8 Shoreham Harbour	6	
Total		837	
Sites under construction			
Land at Brighton Marina (Outer Harbour)	DA2 Brighton Marina & Black Rock	661	Part of planning permission for 853 dwellings
Former St Gabriel's Home 18 Wellington Road	DA3 Lewes Road	9	
46 Freehold Terrace Brighton (HRA)	DA3 Lewes Road	8	HRA site
187 Lewes Road	DA3 Lewes Road	6	
Preston Barracks Lewes Road	DA3 Lewes Road	363	DA3 strategic allocation for min 300 dwellings
Selsfield Drive Housing Office, Brighton BN2 4HA		30	HRA site

Site name	Development Area	No. dwellings	Notes
25-28 Elder Place	DA4 London Road Area	7	
Circus Street (EM9)	DA5 Eastern Road / Edward Street	142	DA5 strategic allocation for min 160 dwellings
Court Farm House King George VI Avenue Hove	DA7 Toads Hole Valley	69	Part of DA7 strategic allocation for minimum 700 dwellings
9-16 Aldrington Basin/Land South of Kingsway	DA8 Shoreham Harbour	52	Part of Policy H1 mixed use site allocation for 90 dwellngs
Total		1,347	
Planning permissions not yet started			
87 Preston Road (EM2)	DA4 London Road Area	25	Policy H1 residential site allocation
Longley Industrial Estate New England Street	DA4 London Road Area	201	Part of DA4 strategic allocation for 165 dwellings
Anston House, Preston Road (EM2)	DA4 London Road Area	229	Part of DA4 strategic allocation for 450 dwellings
Edward St (Amex House)	DA5 Eastern Road / Edward Street	168	DA5 strategic allocation for min 65 dwellings
Belgrave Centre	DA8 Shoreham Harbour	104	Policy H1 residential site allocation. JV site
Total		727	
CPP1 strategic housing allocations withou	t planning permission		
Gas Works Site, Boundary Road, Brighton	DA2 Brighton Marina & Black Rock	85	DA2 strategic allocation for min 85 dwellings
Land at Brighton Marina (Inner Harbour)	DA2 Brighton Marina & Black Rock	500	DA2 strategic allocation for min 1,000 dwellings
EM1 Melbourne Street/Enterprise Point	DA3 Lewes Road	80	Policy CP3 mixed use employment/housing site
north of Theobald House Blackman	DA4 London Road Area	32	Part of DA4 strategic allocation for 165 dwellings
Telecom House 123 -135 Preston Road (EM2)	DA4 London Road Area	85	Part of DA4 strategic allocation for 450 dwellings
149-151 Preston Road (Thales) (EM2)	DA4 London Road Area	15	Part of DA4 strategic allocation for 450 dwellings
(Natwest) 153 Preston Road (EM2)	DA4 London Road Area	40	Part of DA4 strategic allocation for 450 dwellings
Park Gate 161-163 Preston Road (EM2)	DA4 London Road Area	30	Part of DA4 strategic allocation for 450 dwellings
Richardson's scrap yard and Brewer's Paint	DA4 London Road Area	20	Part of DA4 strategic allocation for 165 dwellings
Vantage Point and Circus Parade New England	DA4 London Road Area	45	Part of DA4 strategic allocation for 165 dwellings
EM1 Freshfield Road Business Park/Gala Bingo	DA5 Eastern Road / Edward Street	110	DA5 strategic allocation for min 110 dwellings
Conway Street (EM1)	DA6 Hove Station	200	DA6 strategic allocation for min 200 dwellings
Toads' Hole Valley King George VI Avenue Hove	DA7 Toads Hole Valley	700	Part of DA7 strategic allocation for minimum 700 dwellings
Total		1,942	
Proposed CPP2 housing allocations witho	ut planning permission		
2-16 Coombe Road (Big Yellow Storage)	DA3 Lewes Road	33	Policy H1 residential site allocation
60-62 & 65 Gladstone Place Brighton	DA3 Lewes Road	10	Policy H1 residential site allocation
City College, Pelham Street	DA4 London Road Area	100	Policy H1 mixed use site allocation
Combined Engineering depot, New England Road	DA4 London Road Area	100	Policy SSA2 strategic site allocation
Former Housing Office (George Cooper House)	DA4 London Road Area	10	Policy H1 residential site allocation
Royal Sussex County Hospital Outpatients	DA5 Eastern Road / Edward Street	35	Policy H1 residential site allocation
PO Sorting Office Denmark Villas Hove	DA6 Hove Station	67	Policy H1 residential site allocation

Site name	Development Area	No. dwellings	Notes
Sackville Trading Estate / Coal Yard, Sackville	DA6 Hove Station	500	Policy SSA4 strategic site allocation
364-368 Kingsway Hove	DA8 Shoreham Harbour	23	Part of Policy H1 mixed use site allocation for 90 dwellngs
Flexer Sacks, Wellington Road, Portslade	DA8 Shoreham Harbour	45	Policy H1 mixed use site allocation
Wellington House, Camden Street, Portslade	DA8 Shoreham Harbour	20	Policy H1 residential site allocation
Prestwich House Portslade	DA8 Shoreham Harbour	15	Policy H1 mixed use site allocation
Regency House Portslade	DA8 Shoreham Harbour	45	Policy H1 mixed use site allocation
Church Road/Wellington Road/ St Peter's Road	DA8 Shoreham Harbour	25	Policy H1 mixed use site allocation
Station Road Portslade	DA8 Shoreham Harbour	15	Policy H1 mixed use site allocation
Total		1,043	
Identified SHLAA sites of 6-9 dwellings			
Rear of 31 Appledore Road & 3-5 Halland Road	DA3 Lewes Road	0	
Above Co-operative 56-57 Lewes Road, Brighton	DA3 Lewes Road	6	
45-47 Cheapside	DA4 London Road Area	9	
79 North Street Portslade	DA8 Shoreham Harbour	6	
Total		21	
Additional housing potential identified on	CPP1 allocated sites		
(identified in SHLAA Update 2017 & Brownfield	Land Register)		
	DA2 Brighton Marina & Black Rock	255	
Total		255	
GRAND TOTAL		6,172	

# Appendix 3 : Housing delivery in the Rest of the City - Schedule of sites

Site name	No. dwellings	Notes
Net completions 2010-2019		
The Post Office 51 Ship Street, Brighton	9	
Builder Centre, Bristol Gardens and rear of Prince Regents Close Brighton	9	
68-74 High Street, Rottingdean Brighton	8	
31-33 Bath Street Brighton	7	
Royal Alexandra Hospital 57 Dyke Road Brighton	119	
Former Bellerby's College, Park House Old Shoreham Road Hove	71	
3 The Ridgway Brighton	7	
58 Palmeira Avenue Hove	7	
25-28 St James's Street Brighton	33	
Eastwoods Garden Centre 251-253 Ditchling Road	9	
1 Cliff Road and 8 Cliff Approach Brighton	6	
Ocean Hotel, Longridge Drive	48	
105 Marine Drive Brighton	8	
107 Marine Drive Rottingdean Brighton	8	
196 Dyke Road Brighton	7	
331 Kingsway Hove	40	
Rear 331 Kingsway Hove	8	
Gala Bingo Hall, 191 Portland Road Hove	35	
Land to rear of 67-81 Princes Road Brighton	6	
Rowan House Rowan Close Portslade	9	
Land at Redhill Close, Westdene	31	
EM1 Franklin Road Former Infinity Foods Site 45 Franklin Road & 67 67a	31	
Vale House Vale Road Portslade	42	
20-36 Baden Road Brighton	9	
Dresden House 34-38 Medina Villas Hove	33	
23A & 23E Coleridge Street Hove	6	
Former Gospel Hall, 57 Falmer Road Brighton	6	
39 Salisbury Road Hove	9	
Former Nurses Accommodation Brighton General Hospital Pankhurst	95	
(RSL site) St Benedicts Convent 1 Manor Road Brighton	46	
(RSL site) Pioneer House 60 Burstead Close Brighton	24	
(RSL site) 26-28 Brading Road Brighton	12	
1 to 5 Franklin Road Portslade	9	
24 Castle Street, Brighton	7	

Site name	No.	Notes
	dwellings	
19 Brunswick Place Hove	6	
63 Holland Road Hove	7	
City Park Orchard Road Hove	6	
Rear of 20-32 Baden Road Brighton	7	
St Albans Church Coombe Road Brighton	9	
28-29 Western Road Hove	9	
323-325 Mile Oak Road Brighton	9	
Stanmer House Stanmer Brighton	15	
Buckingham Lodge Buckingham Place Brighton	6	
24 St James's Street Brighton	6	
Rotary Point 81 Windlesham Close Portslade	10	
22 Sussex Square Brighton	6	
22 Burlington Street, Brighton	7	
49 Brunswick Road, Hove	7	
21 Burlington Street, Brighton	6	
70-73 Western Road	6	
28 Marine Drive	9	
145 Vale Avenue	9	
19 The Upper Drive	8	
8 Pavilion Parade	7	
80 Stoneham Road	7	
Kings Gate 111 The Drive	6	
3 to 5 Vernon Gardens Denmark Terrace	10	
20 Old Steine Brighton	7	
Phoenix House 15a-19 Norway Street Portslade	6	
13-15 Old Steine Brighton	7	
30-31 Devonshire Place, Brighton	6	
160 Dyke Road	6	
St Augustine's Church, Stanford Avenue	9	
Brooke Mead, Albion Street (HRA)	36	HRA site
Halstead Scaffolding Ltd 18 24 28 & 30 Kingsthorpe Road Hove	9	
17 Goldstone Crescent Hove	6	
4-6 Montefiore Road Hove	10	
Port Hall Mews Brighton	6	
Wavertree House Somerhill Road Hove	6	
St Andrews Day and Resource Centre St Andrews Road Brighton	7	
31& 33 Selborne Road Hove	10	
43 Palmeira Avenue	8	

Site name	No. dwellings	Notes
3-4 Western Road Hove	6	
Mitre House 149 Western Road	12	
2 Osmond Road	13	
Priory House Bartholomew Square Brighton	40	
243 Preston Road	7	
245 Preston Road	7	
Findon Road, former Whitehawk Library site, Brighton BN2 5FP (HRA site)	57	HRA site
Wellsbourne site, Whitehawk Road, Brighton, BN2 5FL (HRA site)	29	HRA site
7 Symbister Road	9	
25 Arthur Street Hove	6	
Royal York Buildings 41-42 Old Steine Brighton	8	
2 Dudley Road, Brighton	7	
HRA site Robert Lodge Manor Place Brighton (HRA) Northern Block	6	HRA site
11-12 Marlborough Place Brighton	17	
Martello House 315 Portland Road Hove (Part of Em1 site)	28	
19 & Land Adjacent to 19 Dorset Gardens Brighton	6	
379 & Land Rear 377 Kingsway, Hove	8	
121-123 Davigdor Road (Happy Cell)	47	Part of Policy SSA3 strategic site allocation
Mill House Pub, 131 Mill Lane, Portslade	8	
HRA site Robert Lodge Manor Place Brighton (HRA) Southern Block	9	HRA site
83 - 85 Western Road Hove	6	
Units 1, 2, 4, 5, 6, 7, 8, 10 and 11 Bush Mews 5 Arundel Road Brighton	9	
Stretton Hall (Part of EDF Portland Road Business Park (EM1)	9	
173 Church Road Hove	6	
Russell House Russell Mews Brighton	53	
201 Dyke Road Hove	8	
60 Wilbury Road Hove	11	
23 & 24 Old Steine Brighton	9	
Land Adjacent To Cedar Centre Lynchet Close Brighton	8	HRA site
1 Nizells Avenue, Hove	8	
Lace House, 39 - 40 Old Steine, Brighton	9	
Goldstone Business Centre 2 Goldstone Street Hove	9	
Kensington Street car parking sites, Brighton BN1 4AJ (HRA Site)	12	HRA site
39-42 East Street Brighton	9	
67 Falmer Road, Rottingdean	8	
Microscape House Hove Park Villas Hove	7	
123-129 Portland Road	12	
39 Old Shoreham Road Brighton	6	

Site name	No. dwellings	Notes
Southdowns Court Lustrells Vale Saltdean	7	
Freshfield Inn 230 Freshfield Road, Brighton	6	
Blocks A, B, & C Belvedere, 152-158 Dyke Road, Brighton	2	
Total	1,675	
Sites under construction		
Saunders Glassworks, Sussex Place, Brighton	49	Policy H1 residential site allocation
Martello House 315 Portland Road Hove (Part of Em1 site)	4	
123-129 Portland Road	4	
Former Brewery site, South Street Portslade (Mersen)	48	
Texaco Service Station 133 Kingsway Hove	58	
27-31 Church Street Brighton	10	Policy H1 mixed use site allocation
Lansdowne Place Hotel, Lansdowne Place, Hove	45	
Hanningtons Lane North Street and Brighton Square Brighton	12	
Astoria 10-14 Gloucester Place Brighton	70	
Blocks A, B, & C Belvedere, 152-158 Dyke Road, Brighton	4	Permission for 6 units, 2 units already completed
Montpelier Baptist Church (Baptist Tabernacle), Montpelier Place Brighton	24	
251-253 Preston Road, Brighton	28	
27 Palmeira Avenue Hove	6	
48-50 Western Road Brighton	9	
17 Bampfield Street, Portslade	6	
The Downsman 189 Hangleton Way and Land east & north Hove	33	
113-119 Davigdor Road, Hove	52	Part of Policy SSA3 strategic site allocation
Blocks E & F Kingsmere, London Road	8	
76-79 & 80 Buckingham Road Brighton	34	Policy H1 residential site allocation
(EM1) School Road Industrial Area School Road Hove (Rayford House)	9	
61-62 Western Road Brighton (HMV)	9	
(EM1) School Road Industrial Area School Road Hove (Westerman	104	
The Coach House, 1-6 Lions Gardens, Withdean Avenue	19	
Whitehawk Clinic Whitehawk Road Brighton	38	Policy H1 residential site allocation
51-53 Church Road	12	
Blocks A & B, Kingsmere, London Road	8	
Total	703	
Planning permissions not yet started		
UF Sites 4b, 5, 5a Land Off Overdown Rise And Mile Oak Road Portslade	125	Policy H2 urban fringe site allocation
Land at 189 Kingsway Hove (Sackville Hotel)	60	Policy H1 residential site allocation
UF Site 50 Land West of Falmer Avenue	32	Policy H2 urban fringe site allocation

Site name	No. dwellings	Notes
Preston Park Hotel, 216 Preston Road, Brighton	22	Policy H1 residential site allocation
65 Orchard Gardens Hove	23	
UF Site 48-48a Cluster sites Saltdean (Land at Coombe Farm, Westfield	65	Policy H2 urban fringe site allocation
Kings House, Grand Avenue, Hove	169	Policy H1 residential site allocation
Buckley Close garage site, Hangleton BN3 8EU (HRA site)	12	Policy H1 residential site allocation
St Aubyns School 76 High Street Rottingdean Brighton	93	Policy H1 residential site allocation
UF Site 21 of cluster of sites at Coldean	242	Policy H2 urban fringe site allocation. JV site
29 - 31 New Church Road Hove	45	Policy H1 residential site allocation
Peacock Industrial Estate Lyon Close Hove	152	Part of Policy SSA3 strategic site allocation
35-39 The Droveway Hove (Dairycrest)	14	Policy H1 mixed use site allocation
Total	1,054	
CPP1 strategic housing allocations without planning permissio	 n	
King Alfred, Kingsway, Hove	400	SA1 strategic allocation for min 400 dwellings
Total	400	
Proposed CPP2 housing allocations without planning permission	on .	
2 to 18 The Cliff, Brighton	10	Policy H1 residential site allocation
Brighton General Hospital, Elm Grove, Brighton	200	Policy SSA1 strategic site allocation
Manchester Street/Charles Street, Brighton	12	Policy H1 residential site allocation
UF Site 42 Land adjacent to Ovingdean Road	45	Policy H2 urban fringe site allocation
Former Hollingbury Library, Carden Hill, Brighton	10	Policy H1 residential site allocation
Eastergate Road Garage Site (HRA)	24	Policy H1 residential site allocation. HRA site
(Smokey Estate) Corner of Church Road, Lincoln Road & Gladstone Road	32	Policy H1 residential site allocation
Land south of Lincoln Cottages (Lincoln Cottage Works) 15-26 Lincoln	18	Policy H1 residential site allocation
25 Ditchling Rise/rear of 57-63 Beaconsfield Road Brighton	15	Policy H1 residential site allocation
Preece House 91-103 Davigdor Road Hove	14	Part of Policy SSA3 strategic site allocation
PO Delivery Office 62 North Road Brighton	110	Policy H1 mixed use site allocation
Housing Office Victoria Road Portslade (adj Portslade Town Hall)	37	Policy H1 residential site allocation. HRA site
Land at corner of Fox Way and Foredown Road Portslade	10	Policy H1 residential site allocation
76 Church Street, Brighton (Patrick Moorhead Antiques/warehousing) (Old	50	Policy H1 mixed use site allocation
Former playground, Swanborough Drive, Whitehawk	39	Policy H1 residential site allocation
UF Sites 4, 4a Cluster of sites at Mile Oak Road	70	Policy H2 urban fringe site allocation
Old Ship Hotel, 31-38 Kings Road, Brighton	18	Policy H1 residential site allocation
UF Site 1 and 2 Land West of Mile Oak Road, Portslade	30	Policy H2 urban fringe site allocation
UF Site 11 Benfield Valley, north Hangleton Lane	60	Policy H2 urban fringe site allocation
UF Site 12 Benfield Valley, south Hangleton Lane	40	Policy H2 urban fringe site allocation
UF Site 16 Land at and adjoining Horsdean Recreation Ground, Patcham	25	Policy H2 urban fringe site allocation

Site name	No. dwellings	Notes
UF Site 17 Land at Ladies Mile, Carden Avenue	35	Policy H2 urban fringe site allocation
UF Site 30 Land at and adjoining Brighton Race Course	30	Policy H2 urban fringe site allocation
UF Site 32 land at Southdown Riding School	15	Policy H2 urban fringe site allocation
UF Site 33 Land North of Warren Road	30	Policy H2 urban fringe site allocation
UF Site 46a Land at Former Nursery site west of Saltdean Vale	24	Policy H2 urban fringe site allocation
UF Site 21a Land north of Varley Halls	12	Policy H2 urban fringe site allocation
UF Site 38-39 Cluster at Ovingdean Farm	50	Policy H2 urban fringe site allocation
Total	1,065	
Identified SHLAA sites of 6-9 dwellings		
12 Richmond Parade, Brighton	7	
Hove Business Centre Fonthill Road Hove	9	
204 Old Shoreham Road Portslade	8	
12 Lyndhurst Road, Hove	6	
21a-21b Bedford Place, Brighton	7	
10 Wilbury Road Hove	9	
10 Shirley Drive Hove	9	
Land To The East Of The Vale Brighton	6	
Shermond House 58 - 59 Boundary Road	10	
108 North Street Portslade	6	
Clermont Church, Clermont Terrace	6	
St Georges House 34-36 St Georges Road	6	
25 Preston Park Avenue	7	
25 York Villas	7	
Lansdowne Mews Farm Road Hove	6	
44 - 50 Brunswick Street West Hove	6	
Lee Hire 7-13 Church Place Brighton	7	
25 Montague Place Brighton	6	
55 (adj 31Walpole Road) Canning Street Brighton	6	
Land and garages at rear of 1 -3 Queensway Southwater Close Brighton	9	
1 Shelldale Road Portslade	6	
117 Victoria Road Portslade	6	
PO Sorting Office Nevill Road, Rottingdean Brighton	8	
Studor House, 13 Sheridan Terrace Hove	9	
Patcham Garage, 41 Old London Road, Patcham	6	
21A- 21F Station Road Portslade	7	
Land between 38-50 Carlyle Street Brighton	9	
Tudor Grange 13 The Upper Drive Hove	6	

Site name	No. dwellings	Notes
Vye's, 19-27 Carlton Terrace Portslade	6	
St David's Hall, Whitehawk Road Whitehawk Way Brighton	9	
57 Station Road Portslade	6	
Park Manor, London Road, Brighton	6	
Land rear 8 Inwood Crescent, Brighton	6	
Sussex House 130 Western Road Hove	9	
43-45 Bonchurch Road Brighton	6	
UF Site 36 Land south of Warren Road (including mixed open spaces and	8	
Total	256	
Additional housing potential identified on CPP1 allocated sites		
(identified in SHLAA Update 2017 & Brownfield Land Register)		
King Alfred, Kingsway, Hove	100	SA1 strategic allocation for min 400 dwellings
Total	100	
GRAND TOTAL	5,253	



