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|  | Cabinet 13 October 2025 |
| | Report from the Corporate Director Neighbourhoods and Regeneration |
| | Lead Member – Cabinet Member for Regeneration, Planning & Property (Councillor Teo Benea) |
| Brent Purpose Built Student Accommodation Planning Position Statement | |
| Wards Affected: | All except parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton, where OPDC is the Local Planning Authority. |
| Key or Non-Key Decision: | Key |
| Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small> | Open. |
| List of Appendices: | One Appendix A: Brent Planning Position Statement for Purpose Built Student Accommodation |
| Background Papers: | London Plan March 2021 Purpose Built Student Accommodation LPG October 2024 Brent Local Plan 2019-2041 |
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1.0 Executive Summary

- 1.1. Cabinet is requested to consider recent trends for purpose-built student accommodation (PBSA) both delivered and within the pipeline within Brent, and the potential impact if current trends are perpetuated on meeting housing need and providing balanced and mixed communities, particularly in the Wembley Growth Area and approve publication of a Brent PBSA Planning Position Statement for consultation. This sets out the Council's position that in advance of the review of the Brent Local Plan, a temporary pause on additional PBSA planning consents other than those which have reached an advanced stage in negotiation, should occur for Wembley Growth Area. The position statement

will be issued for a period of consultation, and after considering the responses the Council will decide whether to adopt it as a material consideration in the determination of planning applications.

2.0 Recommendation(s)

- 2.1 That Cabinet considers the recent trends of purpose-built student accommodation in Brent, the relevant planning policy provisions, the role of the accommodation in addressing a wide range of positive outcomes, and the need for balanced and mixed communities.
- 2.2 That Cabinet approves the Brent Planning Position Statement for Purpose Built Student Accommodation as set out in Appendix A for consultation.
- 2.3 That Cabinet delegates authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to consider the consultation responses, the need for any changes, and whether to adopt the Brent Planning Position Statement for Purpose Built Student Accommodation and for this to be a material consideration in respect of decisions on planning applications.

3.0 Detail

Cabinet Member Foreword

- 3.1 The Council embraces the opportunities that development can bring in improving the social, economic and environmental prospects of Brent. It has consistently been one of London's top performers in delivering new homes and accommodation to meet its, as well as wider London's, needs. This has been an integral part of the positive transformational changes that have and will occur across the borough, particularly in its growth areas, such as Wembley.
- 3.2 London's higher education institutions are world renowned and support its and the UK's role in providing quality education and research that supports social, economic and environmental sustainability. The presence of higher education institutions in Brent is limited. However, the size of the sector in London, together with limited opportunities centrally to accommodate students, means Brent does and will play a role in housing students. Increasingly purpose-built student accommodation (PBSA) will meet those accommodation needs.
- 3.3 Brent has provided a substantial number of PBSA bedspaces in the last decade. Currently there is substantial interest in the sector, with activity elevated significantly when compared to conventional housing proposals. However, in Wembley if recent trends were to be continued for the next three years, there is the prospect of a potential imbalance in Brent priority housing needs being met and longer term an unbalanced and mixed community occurring. To address this in advance of the Brent Local Plan review, a planning position statement will provide clarity. This is not new policy but clarifies the Council's interpretation of what it considers to be an acceptable concentration of PBSA in supporting balanced and mixed communities.

3.4 The position statement provides a positive framework for managing development to meet the borough plan priorities as follows:

1. **Prosperity and Stability in Brent** – The statement seeks to address housing needs of Brent’s population whilst balancing that with providing for PBSA to support London’s needs. PBSA is a strong development sector, attracting inward investment. This can be important, particularly in the early stages of delivery of ambitious regeneration schemes, or subsequent in maintenance of their delivery rates, contributes to housing delivery targets and brings with it a population that increasingly has a higher representation of foreign students with significant spending power, supporting Brent’s economic base.
2. **Thriving Communities** – Addressing the provision of balanced and mixed communities will help create places that are sustainable in the longer term. A strengthened sense of place helps to improve development outcomes and create a sense of belonging which contributes towards community cohesion.
3. **The Best Start in Life** – A principal determinant of future life chances for younger people is having a stable accommodation, including a home that is affordable, has sufficient space to live and growth in and internally provides a healthy environment. The interim statement helps support additional conventional priority affordable housing needs.

Background

3.5 PBSA typically is for full-time students in higher education. In Brent it has been new-build predominantly multi-bedroom ‘cluster flats’ (linked to kitchen/ dining/ living rooms) and additional shared amenities targeted at student lifestyles and support (e.g. for socialising, studying, laundry, health and wellbeing). More recently the sector has sought to move towards more studio units with shared amenities. Accommodation is managed either by a university or a specialist landlord with rooms/ bed spaces let individually, usually for an academic year.

Brent and its role in supporting PBSA

3.6 Brent has one higher education institution campus, University of Westminster at Northwick Park, which has some PBSA (150 bedspaces) on site. Over the last decade or so the amount of PBSA in Brent has grown significantly. 6,257 bedspaces are now completed, 1,617 under construction 1,559 either permitted or planning committee has approved in principle, subject to some outstanding issues being satisfactorily addressed. 2,010 bedspaces applications are yet to be subject to decision and 918 bedspaces are in relatively advanced discussions having received advice that the principle of PBSA is acceptable prior to submission of an application. Most of the provision is within Wembley Growth Area, albeit other Growth Areas are now starting to be subject to greater interest.

- 3.7 Notwithstanding Brent's limited representation of higher education institutions, it is recognised that it does have a role to play in supporting the student accommodation needs of London. The London Plan's existing and emerging evidence base indicates there is a strong need for additional PBSA. This reflects the volume of institutions and their student numbers. Being able to offer accommodation guarantees (e.g. to first-year students) through PBSA is important to the institutions competing for students domestically and internationally and contributes to their ongoing viability, growth and world-class status. Some students welcome 'all-inclusive' rents which allows for more predictable bills and budgeting. The quality of the accommodation with dedicated study, sleeping and social spaces that are well designed and maintained, can also be an attractive feature for students.
- 3.8 Central London boroughs where most institutions are located have significant accommodation supply constraints and an inability locally to address this. This is mostly due to lack of sites for PBSA, but the associated expense of delivery also would result in very high accommodation costs for students. Outer London boroughs have less of these limitations; thus, well-connected locations are attractive to PBSA operators and students who may study centrally.

Additional benefits of PBSA

- 3.9 Across the wider London housing market, in the longer term the provision of PBSA will help reduce students living in housing or houses in multiple occupation. This will free up potential capacity within that accommodation to meet more conventional housing needs. To reflect this, PBSA schemes are counted towards housing delivery targets with 2.5 bedspaces being regarded as equivalent to 1 dwelling.
- 3.10 PBSA can be beneficial to supporting regeneration areas. Often it can act as a 'pioneer' use supporting earlier phases of delivery and give confidence to other developers to bring forward other sites. Due to the pent-up need, investment in the sector tends to be more consistent, with it less likely to be subject to the extremes in delivery that can occur for conventional housing impacted by economic cycles. It helps support the Council's housing delivery test compliance.
- 3.11 Overseas students, a higher proportion of who occupy PBSA often have a high disposable income and therefore along with other students in PBSA can contribute significantly to local economies through their purchasing power.

Development Plan Policy and Guidance

- 3.12 PBSA is subject to policies both within the London Plan 2021 (Policy H15 Purpose Built Student Accommodation) and the Brent Local Plan 2019-2041 (Policy BH7 Accommodation with Shared Facilities or Additional Support). Both are supportive of PBSA subject to a range of criteria being met. The policies however do reference the need for the provision of PBSA to avoid an over-concentration (BH7) and support balanced and mixed communities (H15). This issue has been given greater consideration in the recently adopted PBSA

London Plan Guidance. It is becoming evident that some boroughs appear to be becoming the predominant locations for PBSA investment activity. This is raising concerns within them about the imbalance of PBSA activity compared to conventional housing and impacts on achieving borough priority housing needs.

Brent Priority Housing Needs

- 3.13 Brent like other London boroughs is impacted by the lack of housing supply compared to needs. Providing more homes to meet needs is one of the Council Borough Plan's key priorities. Brent historically has done comparatively well and is within the top 3 for delivery of new homes in London over the last 10 years. Notwithstanding this, needs for affordable homes and family sized homes are acute and in the last couple of years have become more so. The Council has seen the number of people presenting as homeless increase by 23% in the 3 years to August 2024 with 140 households becoming homeless each week. This has continued to rise, with more than half of these homeless now housed in temporary accommodation.
- 3.14 During this time conventional housing delivery has slowed significantly, despite over 8000 homes having planning permission, completions in 23/24 being 656 net additions, or less than a third of the 2325 required. A multiplicity of factors including construction costs and availability of materials, lack of construction labour, building safety issues, reduction in help to buy and buyer confidence/ability to attain mortgage finance has impacted viability and delivery. At the same time investor interest in PBSA has increased, with PBSA now being promoted on some sites previously consented for conventional homes.
- 3.15 This has brought concerns from councillors that provision and prioritisation of PBSA is reducing the ability of Brent to meet more pressing conventional housing needs. Whilst student accommodation is displacing some conventional homes schemes, in the context of Brent's overall housing stock the number of PBSA units existing and potentially coming forward currently is relatively small. The issues with conventional housing delivery currently are so severe that limiting PBSA provision would arguably do little to support additional conventional housing delivery.

Wembley Growth Area

- 3.16 As identified however, the spatial distribution of PBSA provision has been focussed on Wembley Growth Area where to date 6058 bedspaces have been constructed. Currently 21.8% of the Growth Area's population is students either in PBSA or in all student households renting homes.
- 3.17 A further 1617 PBSA bedspaces are under construction and planning committee has been minded to approve 759 more bedspaces, subject to an appropriate S106 obligation. Some sites are subject to current applications and others are also in relatively advanced pre-application discussions where the principle of PBSA has been identified as acceptable. If all delivered, a further 3500 student bedspaces could be supplied in the next 3 years, resulting in 9558

bedspaces in total. It is anticipated that 1871 additional dwellings will be completed in the area in the next 3 years. Students would in three years comprise 26.8% of the overall population.

- 3.18 In the short term this is not considered to be a mixed and balanced population. However, development is often cyclical, and officers have been mindful of the overall predicted future population when considering the acceptability of these student schemes. Wembley Growth Area has a substantial number of conventional homes either with planning permission or that are predicted to be developed on site allocations by 2041. If no additional PBSA above that identified to be delivered in the next 3 years, were provided in the period to 2041, the student population would return to 20.8%. This is closer to levels that historically have been identified as appropriate number in policy (Wembley Area Action Plan).
- 3.19 Given the short-term projected population imbalance however, and the sustained strong interest in promoting PBSA schemes, it is considered that it would be appropriate for the Council to clarify its position in the short term in relation to additional PBSA schemes in Wembley Growth Area. A continuation of the trend seen in the last three years adding to that which is already in the pipeline to the amount of PBSA in the Growth Area is not considered appropriate. As such, the Council can indicate that it wishes to see a pause in additional PBSA schemes in Wembley Growth Area other than those consented, submitted as applications or in advanced pre-application discussions where the principle of PBSA has already been indicated as acceptable. In other Growth Areas the issue is less acute, but similarly the statement can identify that monitoring potential over-concentration will occur, with the Council clarifying it may seek similar pauses should it be required.
- 3.20 As this is an interpretation of policy in relation to clarifying the position in terms of PBSA over-concentration/ supporting balanced and mixed communities, rather than writing new policies, it is suggested that the Council issues a policy position statement. Although not officially recognised in planning statutes as a Local Development Document or perhaps having the weight of a Supplementary Planning Document (SPD), if consulted upon and following the same processes as a SPD, once adopted by the Council it can be regarded as a material consideration in the determination of planning applications with some weight.
- 3.21 As the Council will start its Local Plan review process more formally next year, the position statement can be an interim solution. The Local Plan will allow the Council to more fully consider its policies in respect of PBSA provision in the borough, and issues such as over-concentration, and the priority given to PBSA compared to other conventional housing to meet Brent's needs to be clarified and tested more rigorously.

PBSA Schemes Addressing Conventional Housing Needs

- 3.22 Although PBSA schemes may not currently address conventional housing needs directly, new schemes coming through the planning process could

potentially do so more specifically. More recently the Council has been able to negotiate provision of an affordable housing payment in lieu to meet borough housing needs instead of the provision of affordable student housing within schemes. This would partially address the limited activity in respect of conventional housing currently coming forward, which in turn is limiting affordable housing delivery. Given the interest in PBSA there is also the potential for the Council to seek to encourage its development to potentially incorporate some conventional affordable housing in separate blocks on site that could meet priority needs. This could support delivering homes that in the short term may otherwise not be delivered due to the lack of viability/ market desire to deliver conventional homes. Both these matters have been addressed in the position statement attached in Appendix A.

- 3.23 Additionally, the potential for PBSA students to better integrate into and support Brent social, economic and environmental outcomes through, for example, volunteering is also encouraged in association with the policy aim of seeking to support mixed and inclusive neighbourhoods.

Options

- 3.24 There are potentially two options open to the Council:

- a) Take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.
- b) Do not take forward the Brent Planning Position Statement for Purpose Built Student Accommodation

Option a) Take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.

- 3.25 This will provide clarity to prospective developers or investors in PBSA, particularly in Wembley Growth Area that, other than schemes already subject to approval or with clear advice from the Council through the pre-application process that the principle of PBSA is currently acceptable, the Council is unlikely to support their scheme in the short term.
- 3.26 Such an approach will allow a pause to occur and for the Council to get a better understanding of whether this should be a more permanent situation to be taken forward in a local plan review, or whether additional PBSA sites can be supported in the future. This will allow those developers to make an informed decision as to whether to continue to seek to move forward with PBSA on sites or invest the funds elsewhere in a location more likely to be viewed positively.
- 3.27 Setting out the Council's view of PBSA prioritising payments in lieu or on-site conventional housing/ affordable housing instead of affordable student accommodation is likely to lead to better outcomes for the borough in meeting its housing needs. For these reasons, this is the recommended option.

Option b) Do not take forward the Brent Planning Position Statement for Purpose Built Student Accommodation.

- 3.28 This will not provide clarity to prospective developers or investors in PBSA, particularly in Wembley Growth Area that, other than schemes already subject to approval or with clear advice from the Council through the pre-application process that the principle of PBSA is currently acceptable, the Council is unlikely to support their scheme. This will not allow those developers to make an informed decision as to whether to continue to seek to move forward with PBSA on sites or invest the funds elsewhere in a location more likely to be viewed positively. This could lead to prospective schemes in Wembley being refused permission, with the associated resource implications for the developer.
- 3.29 Not setting out the Council's view of PBSA prioritising payments in lieu or on-site conventional housing/ affordable housing instead of affordable student accommodation will either lengthen the decision-making process to allow such changes to be made to a development, or mean affordable student accommodation is delivered, which would likely result in poorer outcomes for the borough in meeting its housing needs. For these reasons, option b) is not the recommended option.
- 3.30 On this basis, option a) is the recommended option.

Next steps

- 3.31 The Council will follow the steps normally applied to a SPD as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This includes a minimum of 6 weeks consultation, consideration of the responses and if necessary, amendments to the position statement, prior to the consideration of whether to adopt it.
- 3.32 To reduce Cabinet business it is recommended that Cabinet delegates authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to consider the consultation responses, the need for any changes, and whether to adopt the Brent PBSA Planning Position Statement and for this to be used by officers and planning committee as a material consideration on which they should place some weight in respect of decisions on planning applications.

4 Stakeholder and ward member consultation and engagement

- 4.1 The appropriate levels of consultation and engagement consistent with the Council's Statement of Community Involvement regarding Supplementary Planning Documents will be undertaken.

5 Financial Considerations

- 5.1 The activities arising in producing and adopting the position statement are consistent with those typically associated with planning policy work and will be

addressed within the existing resources available to the policy team with regards to the establishment and revenue budget.

6 Legal Considerations

- 6.1 The processes will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Prior to adoption by the Council, the position statement will have some limited weight in the determination of planning applications, post adoption the weight will increase.

7 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have 'due regard' to the need to:
- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c) Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.3 The planning position statement has been subject to Equalities Impact Assessment screening. The statement interprets existing London Plan and Brent Local Plan policy and London Plan Guidance, rather than introducing new policy. It clarifies that it considers no additional PBSA is appropriate beyond that which has been subject to at least some form of confirmation of its acceptability in principle, either by planning committee or officers through the pre-application process for Wembley Growth Area. This will limit the additional provision of PBSA which might have otherwise come forward (albeit not certain that such development would have come forward as it could in any case have been refused based on the policy). This potentially disproportionately impacts 18–21-year-olds and foreign nationals in higher education who will have a higher representation amongst those impacted compared to the general population. This could result in prospective occupiers of additional PBSA that might otherwise have been built being accommodated in a poorer standard of accommodation. In respect of foreign nationals, it may reduce their likelihood of applying to study at London institutions.
- 7.4 The Council's approach to prioritising payment in lieu of affordable student accommodation for use for other forms of affordable housing to meet Brent

needs may also adversely affect those students from disadvantaged backgrounds unable to afford full market PBSA rents.

- 7.5 In limiting additional PBSA in Wembley Growth Area, this will prioritise site allocations and future windfall housing sites for types of homes that address more conventional Brent priority housing needs. Due to Brent's population characteristics, for more general conventional housing this will be beneficial to ethnic minority groups who comprise more of the population than nationally. In addressing affordable housing, this will also be beneficial to the more economically disadvantaged in allowing them to meet their housing need. These people comprise greater representation from ethnic minority groups and the disabled than the wider national population.

8 Climate Change and Environmental Considerations

- 8.1 There are no specific impacts related to the position statement. For example, both PBSA and conventional homes developments are subject to similar environmental standards policies. In respect of being required to reduce carbon emissions both must reduce energy use and maximise use of renewables to achieve a minimum 35% reduction on building regulations standards and achieve net zero on site or through carbon off-set payment.

9 Human Resources/ Property Considerations

- 9.1 There are no specific impacts related to the position statement.

10 Communication Considerations

- 10.1 Consistent with the approach to supplementary planning documents, there will be an appropriate level of communication's team support to raise awareness, e.g. through press releases/ council social media notifications to complement the engagement measures set out in the Councils' Statement of Community Involvement. Councillors will be made aware of the consultation through the members' bulletin. The Council's consultation portal on the website will be used to host the consultation. Those on the Council's planning policy database will be notified of the consultation.

Report sign off:

Jehan Weerasinghe

Corporate Director Neighbourhoods and
Regeneration