



**Corporate Director
Neighbourhoods and Regeneration
Delegated Decision - 28 January
2026**

**Report from the Director Inclusive
Regeneration and Climate
Resilience**

**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 decision.
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open.
List of Appendices:	Two Appendix A: Schedule of Consultation Responses to Draft Brent Planning Position Statement for Purpose Built Student Accommodation Appendix B: Brent Planning Position Statement for Purpose Built Student Accommodation Showing Proposed Amendments
Background Papers:	<u>Brent Purpose Built Student Accommodation Planning Position Statement Cabinet 13th October 2025</u>
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1.0 Executive Summary

- 1.1. The Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning & Property is requested to

consider the representations received to the Council's consultation on the Brent Purpose Built Student Accommodation (PBSA) Planning Position Statement. Officer responses to the summarised representations and where necessary suggested changes to the statement are set out in Appendix A. The amended Brent PBSA Planning Position Statement recommended for adoption is set out in Appendix B.

2.0 Recommendation(s)

2.1 That the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning & Property:

- a) considers the representations received to the Council's consultation on the Brent PBSA Planning Position Statement, officer responses and any necessary suggested changes to the Statement as set out in Appendix A; and
- b) approves the Council's adoption of the amended Brent PBSA Planning Position Statement as set out in Appendix B to be a material consideration in the determination of planning applications and pre-application advice.

3.0 Detail

Contribution to Borough Plan Priorities & Strategic Context

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 On 13th October 2025 Cabinet considered a report on the Brent Purpose Built Student Accommodation Planning Position Statement. The report included several sections including: Brent and its role in supporting PBSA, Additional benefits of PBSA, Development Plan Policy and Guidance, Brent Priority Housing Needs, Wembley Growth Area, PBSA Schemes Addressing Conventional Housing Needs and Next Steps.

3.6 Having noted 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 Cabinet resolved:

- 1) To approve the Brent Planning Position Statement for Purpose Built Student Accommodation as set out in Appendix A for consultation.
- 2) To delegate authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to consider the consultation responses under (1) above, 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.

Consultation Responses

3.7 The consultation on the Brent PBSA Position Statement occurred from 23rd October 2025 until 4th December 2025. Eleven email responses, predominantly from statutory consultees and developer/ landowner agents were received and 8 responses predominantly from residents were received via the Council's web based 'Have Your Say' consultation platform.

3.8 Residents, the Brahmin Society of North London, a community charity operating in the borough, and the Old Oak Neighbourhood Forum were predominantly in support of the Position Statement's clarity in respect of identifying that in Wembley Growth Area it would not support additional PBSA above that with permission or that the Council had already agreed in principle.

3.9 Conversely the developer/ landowner agents and some other respondents did not support the Position Statement. This was principally in respect of the suggestion that the Council would be unlikely to support additional PBSA schemes in Wembley Growth Area. The reasons for this included:

- a) the significant unmet need/ demand for student accommodation places in Wembley and its ability to meet London's overall needs
- b) that additional PBSA frees up capacity in existing homes to meet Brent housing needs
- c) the use of a non-policy defined and arbitrary 20% student population limit in assessing the compatibility with Policy BH7 criterion related to over-concentration, or Policy H15's criterion assessment of development that contributes to a mixed and inclusive neighbourhood
- d) unrealistic assumptions around delivery of schemes within 3 years which had permission or which had been identified as being acceptable in principle, and population assumptions for the period to 2041
- e) the limiting PBSA would not result in sites coming forward for conventional homes
- f) student accommodation brings economic benefits and there should not be unnecessarily limits on student development that contributes to housing completion figures at a time when housing completions overall are significantly below targets/ need

3.10 In addition, clarifications were sought around the potential to amend existing PBSA permissions, or those agreed in principle where this might impact on student numbers and seeking the removal of late-stage viability assessments where a PBSA scheme had delivered a S106 planning obligation financial contribution for affordable homes.

3.11 In respect of addressing the points above:

- a) It is accepted that there is significant need/ demand for student accommodation in London. The position statement is clear that Brent, despite its limited number of high education institutions, has contributed significantly to London's student accommodation needs over the last

decade. It also indicates that outside Wembley Growth Area PBSA will, subject to over-concentration not occurring will be acceptable in principle. The issue is that for Wembley Growth Area it is considered that further PBSA would not be compatible with a long term mixed and inclusive neighbourhood.

- b) The ability of PBSA to free up existing Brent housing stock for it to meet conventional needs is considered weak and likely to be marginal in its impact. Outside Wembley student occupation of homes is more limited, whilst in Wembley there are strong reasons why students occupy conventional housing, which the provision of additional PBSA is unlikely to affect.
- c) It is accepted the 20% figure is not within policy, but its use to quantify what is an acceptable student proportion of the overall population is considered justified. It is consistent with levels which inspectors elsewhere have regarded as justified for Local Plans that quantify what is an acceptable student population, as well as previously having been considered acceptable in the Wembley Area Action Plan.
- d) Additional 'sensitivity' testing has been undertaken to consider a longer period of 5 years and how this would impact the student population percentage. It is very marginal (around 0.4% lower), with the student population still representing over 26%. It is recommended however that the statement is changed to identify that for PBSA schemes used to calculate the bedspaces that the council has permitted or approved in principle which are to no longer be pursued by their site owners/ developers, the bedspace capacity can be transferred to alternative new sites should there be a desire to pursue a scheme incorporating student accommodation.
- e) It is accepted that limiting PBSA schemes will not automatically result in sites coming forward for conventional homes. There are fundamental reasons why high density residential tall building schemes have stalled, which in the short term will not be overcome. The statement seeks to ensure that in the longer-term Wembley Growth Area has sites that contribute towards meeting Brent's housing needs within a suitability mixed and inclusive neighbourhood.
- f) It is only in Wembley Growth Area that the council is seeking indicate it is unlikely to support additional student accommodation in the shorter term, this is reflective of the desire to retain a longer term mixed and inclusive neighbourhood and residents' support for additional development on the basis that it prioritises homes that meet Brent priority needs, including affordable housing.

3.12 With regards to the potential to amend existing PBSA permissions, or those already agreed in principle, this is considered acceptable if such changes are marginal in respect of the impact on the number of student bedspaces in the scheme. Suggested changes are made to the statement to reflect this position.

3.13 In respect of removing late-stage viability assessments, in principle where a contribution equivalent to policy compliant levels for fast-track purposes has been attained the Council would agree that it should benefit from being treated the same as if it had delivered 35% or 50% affordable on site. However, this is essentially a matter for the GLA as it is the London Plan and associated Guidance that deals with how the viability review process is interpreted.

3.14 A fuller summary of the representations received, officer responses and suggested necessary changes to the position statement is set out in Appendix A. In addition, the title page of the document has been amended to be consistent with the Cabinet report and this decision paper as a planning position statement, with the consultation statement section changed to reflect the fact that consultation consistent with that of a Supplementary Planning Document as required in the Town and Country Planning (Local Planning) (England) Regulations 2012 has occurred as well as the status of the document as a material condition in the determination of planning applications. The revised position statement incorporating track changes is set out in Appendix B. The track changes format shown in appendix will be removed once the adopted version of the document is issued.

Options

3.15 There are potentially two options open to the Council:

- Adopt the Brent Planning Position Statement for Purpose Built Student Accommodation.
- Do not adopt the Brent Planning Position Statement for Purpose Built Student Accommodation

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

3.16 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.

3.17 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.

3.18 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 adopt the Brent Planning Position Statement for Purpose Built Student Accommodation.

- 3.19 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.
- 3.20 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.
- 3.21 On this basis, option a) is the recommended option.

Next steps

- 3.22 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 the publication and making available of an adoption statement and a consultation statement.

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 were undertaken. No formal responses to the consultation were received from ward members.

5 Financial implications

- 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). Once adopted as it has followed the same processes required of SPDs from its inception to adoption,

the position statement will have weight similar to that of a SPD in the determination of planning applications.

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:

Operational Director Gerry Ansell
Director Inclusive Regeneration and Climate
Resilience