

Appendix A

Schedule of Consultation Responses to Brent Draft Planning Position Statement for Purpose Built Student Accommodation

Ref	Name/ organisation	Paragraph/ Section	Representation summary	Officer response	Proposed change
1	Network Rail	All	Sets out statutory duties for Local Planning Authorities in respect of applications for development within 10 metres of relevant railway land.	This matter is captured as part of the Council's routine consideration of which statutory consultees it must consult in association with planning applications. It is not appropriate to include reference to this in the Purpose Built Student Accommodation Planning Statement.	No change
2	Natural England	All	No comments on the document	Noted.	No change
3	Resident 1	All	Support: A mixture of Housing should be use	Further clarification has been sought from the resident on whether this means support for the need for a mix of housing in providing balanced and mixed communities. No response was received.	No change
4	Brahmin Society North London	All	<p>The Society is a long-established Wembley community charity of over 50 years, serving our community through cultural, educational, and social programmes. Our East Lane community centre is a key local hub bringing together intergenerational community members, fostering social cohesion in Wembley and across Brent and Harrow.</p> <p>With activities relevant to the Wembley Growth Area, we have a direct interest in</p>	<p>The breadth of work of the Society does and its impact for Brent residents is recognised and welcomed.</p> <p>Recognition of the Council's approach to seeking to maintain and provide for a balanced and mixed community in a measured way is welcomed.</p>	No change

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			<p>how future development affects the character, affordability, and balance of our neighbourhood.</p> <p>We broadly support the Council's recognition that the scale of PBSA development in Wembley has reached a level where the area risks losing balance and diversity in its community make-up. The draft strategy's intention to pause further PBSA approvals within the Wembley Growth Area (beyond schemes already in advanced stages) is a measured and necessary step.</p> <p>We look forward to continued collaboration with the Council to ensure future planning supports a thriving, diverse, and sustainable Wembley for all residents — students and families alike.</p>		
5	Brahmin Society North London	3.1	We support the proposal to maintain a student population closer to 20% , as this helps sustain a mixed and stable community of families, key workers, and long-term residents alongside students.	Support welcomed.	No change
6	Brahmin Society North London	3.2	We strongly endorse the Council's position that priority must be given to conventional and affordable housing to address Brent's acute housing need. Many of our members and residents face housing insecurity and high rents. Ensuring that available land contributes to genuinely affordable homes rather than primarily	Support welcomed.	No change

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			student accommodation aligns with community well-being and the borough's social priorities.		
7	Brahmin Society North London	3.3	We appreciate the Council's focus on student-community interaction through volunteering, partnership with third-sector organisations, and shared community facilities. BSNL would be pleased to work with universities, PBSA operators, and the Council to create volunteer programmes, cultural exchange events, and community mentoring opportunities linking students with our members and local residents as applicable	The support is welcomed and the Society's desire to work with relevant organisations will be communicated to them.	No change
8	Brahmin Society North London	4.1	We urge the Council to assess the cumulative impact of PBSA and other high-density developments on local amenities — including transport, parking, healthcare, waste management, and open space. Residents around East Lane and Wembley High Road already experience significant pressure on local infrastructure.	Council planners do engage with appropriate internal colleagues and with external infrastructure providers in respect of plan making and planning applications to identify appropriate infrastructure provision to support development. The Council has and will continue to collect and allocate significant S106 planning obligations and Community Infrastructure Levy contributions for this purpose.	No change
9	Brahmin Society North London	4.2	While students enrich local diversity, high turnover rates can make it harder to build stable neighbourhood networks. Brent is encouraged to consider planning mechanisms that promote long-term residency and investment in community life , such as housing for key workers and intergenerational living options.	The Council seeks to address specific housing need and provide for mixed and balanced communities in its planning policies. In respect of key workers, this is most likely to be addressed through its affordable housing delivery, particularly of intermediate affordable products such	No change

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				as discount rent products and shared ownership. For intergenerational options, realistically this is most likely to be delivered in existing housing stock, the Council has updated its residential extensions guidance to better support residents' in adapting existing properties.	
10	Brahmin Society North London	4.3	We support the Council's plan to revisit the PBSA policy through the Local Plan review within the next 3–4 years. We recommend maintaining close engagement with local charities and resident associations, including BSNL, throughout this process to ensure community voices remain central.	This support is welcomed and engagement with local charities and resident associations will be a key part of the approach in taking forward a new Brent Local Plan.	No change
11	Old Oak Neighbourhood Forum	General	Support the Planning Statement, which is justified at the time due to the excess of student housing proposals in several areas of West London, crowding out much needed C3 residential proposals.	Support welcomed.	No change.
12	Old Oak Neighbourhood Forum	1.3	Noted that Brent considers 20.6% student population as an acceptable proportion and 26.5% would be excessive. OPDC declines to identify what figure would be an 'over-concentration'. The North Acton Cluster is approaching a 50/50 balance of students within the overall population should house building stall. This, when combined with extreme heights (55 storeys) is an example of London urban renewal at its worst. Hence, Brent is commended in its action to address PBSA market trends that risks	Appropriate planning policy and its application in respect of North Acton development proposals is a matter for OPDC who engage and work closely with Ealing Council for that area. Direct comparisons with Wembley may not be appropriate. North Acton is relatively early in its delivery and as the Brent statement indicates, PBSA can play an important part in earlier phases of regeneration areas and their long-term success. In addition, Imperial College	No change

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			creating 'developer-led' rather than 'plan-led' regeneration. We hope that as one of OPDC's three boroughs it may choose to follow Brent's example.	is a significant landowner/ investor with an associated longer-term stake in the area, providing not just PBSA on its sites. It will be for OPDC to decide taking account of its and the London Plan policies what is appropriate development in North Acton.	
13	Avison Young Representation for Wembley Edge Property Ltd and separately also for Seven Capital (Watkin Road) Ltd	1.1.4 1.7.2	Wants the Position Statement to only apply to new development and not prevent amendments to existing permissions to result in increased student units and for this to be made explicitly clear. There is a need to review the approved designs and where relevant make appropriate amendments to align with the requirements of the latest legislation and regulations of the Building Safety Act. Preventing optimisation of already approved sites contradicts planning policy at both local and national levels encourages the efficient use of land.	It is agreed that where the principle of student accommodation has already been accepted by the Council that amendments of existing permissions where its provision of is likely to be marginal (either up or down), that this is likely to be regarded as acceptable in principle.	Amend paragraph 1.1.4 last sentence to: "It is unlikely to support further PBSA permissions <u>for additional sites</u> (outside those already submitted or in advanced pre-application discussions where the council has agreed the principle of PBSA) in the Growth Area." And amend paragraph 1.7.2 last sentence to: "The council is therefore unlikely to support PBSA permissions <u>for additional sites</u> (outside those already in advanced pre-application discussions where

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					the council has agreed the principle of PBSA) in the Growth Area.”
14	Avison Young Representation for Wembley Edge Property Ltd and separately also for Seven Capital (Watkin Road) Ltd	1.1.4 and 1.7.2	Amending sites that already benefit from planning permission for PBSA would not displace potential future housing consents.	It is agreed that where either planning permission has been granted or the principle of PBSA on site has been agreed in principle by the Council that minor amendments to schemes that marginally impact on student accommodation numbers on site (either up or down) are likely to be acceptable in principle.	Add another sentence at the end of paragraph 1.1.4. and paragraph 1.7.2 <u>“This will not apply to scheme alterations that marginally impact on site student accommodation numbers (either up or down) which are likely to be acceptable in principle.”</u>
15	Avison Young Representation for Wembley Edge Property Ltd and separately also for Seven Capital (Watkin Road) Ltd	8.1	<p>Where a development is to provide the affordable housing offer in the form of a financial contributions rather than on-site bedspaces at a policy compliant level, it should not be subject to a Late-Stage Review.</p> <p>Additionally, this approach and financial contributions in lieu towards Brent priority affordable housing needs instead of onsite affordable student accommodation should not be limited to PBSA schemes yet to be determined but include consented development.</p>	In principle where a contribution equivalent to the cost of on-site policy compliant levels of affordable accommodation on site has been attained consistent with the fast-track policy the Council would agree that it should benefit from being treated the same as if it had delivered 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.	<p>No change in respect of late-stage viability review.</p> <p>For financial contributions to meet Brent’s affordable housing priorities in lieu of on-site affordable student accommodation change paragraph 1.1.8 to:</p>

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				In principle the Council would have no objection to consented PBSA schemes seeking to move away from on site provision of affordable student accommodation to an equivalent financial contribution in lieu towards meeting Brent priority housing needs.	“For PBSA schemes at pre-application stage yet to be determined , the council wishes to better address its own local housing priorities, particularly in delivering affordable housing.....” and paragraph 1.8.1 to “For PBSA schemes yet to be determined , the council wishes to better address its own local housing priorities, particularly in delivering affordable housing.”
16	National Highways	All	No comments.	Noted.	No change.
17	Savills	All	London is in a city-wide housing crisis which the statement similarly recognises is also occurring within Brent in respect of an intense lack of supply of new homes. Stopping the provision of any accommodation type when it is one of the only housing types being successfully pursued in this current market is counterproductive. To suggest stymying the	The statement in 1.4.1 acknowledges the housing crisis, slow down in delivery and addresses how this is impacting on the ability of the Council to meet the needs of its residents, particularly in respect of affordable homes. The argument that continuing to support additional PBSA in Wembley Growth Area beyond that	No change.

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			<p>delivery of PBSA will result in the delivery of another is a misunderstanding of the conditions of the market currently being experienced across the development cycle.</p> <p>It is short-sighted and incorrect to suggest that prospective developers should simply promote PBSA schemes in <i>'places in London (and beyond) where that resource is more likely to result in a planning permission'</i>, when development prospects and site promotion is directly led by the availability and ownership of sites.</p> <p>A blanket position to rescind support for PBSA in any form within the Wembley Growth Area fails to account for larger-scale developments that seek to bring forward PBSA as a mix of uses. Based on the content of the draft document, the acceptability of PBSA, even within a balanced mix of uses, would be refused in principle due to the assumed position of 'overconcentration'.</p> <p>The development plan at all levels directs the delivery of PBSA to locations such as the Wembley Growth Area, with any development proposal to be assessed in accordance with its policies, unless material considerations suggest otherwise. To introduce a pause in support for a housing type that continues to receive</p>	<p>which has already been agreed in principle simply because it is a typology that is deliverable and counts towards meeting housing supply targets is one dimensional and ignores other Brent specific desired policy outcomes as set out in the Local Plan. The Council must consider all housing needs in the round and other aspects such as supporting mixed long term sustainable communities. The statement does not suggest that reducing additional sites coming forward for PBSA in the short term will automatically result in those sites being delivered for other housing typologies within a similar period to what PBSA might have achieved. If those sites were however developed for PBSA they would not be available for alternative residential typologies and thus be inconsistent with the longer-term aim of supporting a mixed and inclusive community within the Wembley Growth Area that better reflects Brent's housing needs.</p> <p>The statement has been clear about the extent to which Brent and the Wembley area have supported London's strategic need for student accommodation, (see paragraphs 1.1.3 and 1.5.1) despite the limited</p>	

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			<i>'substantial interest'</i> and will be assessed on its own merits in line with the requirements of the adopted policies does not warrant the departure as proposed from the position set out within the adopted development plan.	prevalence of higher educational institutions in (see paragraph 1.3.2) or close to Brent. The Council has indicated that outside of Wembley Growth Area it is supportive in principle of additional student accommodation and set out how PBSA can assist in supporting conventional or affordable housing delivery too. Within Wembley Growth Area however, the Council considers that in the short term, taking account of existing provision, permissions and sites where through pre-application discussions it has agreed student accommodation in principle, that the student population will have reached appropriate level. Beyond this, the provision of additional student accommodation will make an unbalanced and unsustainable population. This position is consistent with the Council's interpretation of development plan policies H15 and BH6.	
18	Savills	1.1.4, 1.1.6, 1.7.2 and 1.7.4	The document will, in essence, introduce the ability for the Council to disregard the policy tests within the adopted Local Plan relating to the delivery of PBSA, by suggesting that the existing level of PBSA in the Growth Area is already one of overconcentration. When this assertion is based solely on broad (and we suggest less than accurate) assumptions relating to	This statement does not disregard policy tests but provides clarity that in respect of Wembley Growth Area additional PBSA schemes, the Council 'is unlikely to support further PBSA (outside those already submitted or in advanced pre-application discussions where the council has agreed the principle of PBSA).' It is being clear	No change

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			<p>future decisions and build out. Employing, and applying weight to, a position that is yet to be proposed and assessed appropriately through the Examination in Public procedure raises a question of fairness and due procedure. The criteria for determining which applications are affected are, as drafted, arbitrary and risk inconsistent interpretation.</p> <p>The approach should remain as written in the adopted Local Plan Policy BH7, whereby it is the prerogative of each applicant to meet the policy tests to demonstrate that there is a specific demand of PBSA within the borough and London, and that any such new development would not result in an over-concentration of PBSA in the local area of any proposal</p>	<p>and transparent about its position taking account of its interpretation of policy H15 and BH6 and seeking to support developers by providing them with greater certainty on its position before they significantly advance their proposals with the associated expenditure.</p> <p>It is for applicants to consider the extent to which the Council's position may impact on their plans. The Council cannot stop the submission of planning applications and applicants setting out why their PBSA developments are consistent with the development plan and should be supported. The statement does not definitively set out any applications will be refused, however, it is clear that in order to be persuaded of their merit, schemes that incorporate PBSA will have to have substantial benefits in other respects to outweigh the concerns about their potential to further contribute to what the Council considers would be further diminishing the likelihood of a long term balanced and inclusive community.</p>	
19	Savills	1.1.4, 1.1.6, 1.7.2 and 1.7.4	Issues with the methodology. To assume that all PBSA bedspaces currently subject to application or positive pre-application discussions will be progressed not only to a	The methodology assumptions are based on the Council's experience that historically in Brent once student schemes are proposed, (either at pre-	Amend paragraph 1.1.4 and paragraph 1.7.2 by adding after the final sentence:

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			<p>positive determination, S106 negotiation, construction, and completion in the short term, specifically 3 years, and that all consented and allocated conventional residential and co-living schemes will be delivered, is a tenuous position on which to base the analysis in the draft document. The methodology used to project student population growth is based on unrealistic assumptions about the delivery of both PBSA and conventional housing, resulting in overinflated figures that do not accurately reflect market realities.</p> <p>The same is true of the period to 2041 for assumptions about delivery of homes on the remaining sites with permission or allocations.</p>	<p>application stage or full applications) they are delivered within short timescales and mostly within 3 years. Taking account of this representation, some additional 'sensitivity' testing has been done by extending the period considered from 3 to 5 years. Due to the significant difficulties facing conventional dwelling delivery currently, which without measures to improve viability is unlikely to change dramatically in the short term (2 years), it is likely limited additional delivery would occur in the period to 5 years compared to 3 years. This is due to the length towers take from start on site to completion (typically at least two years). The extension of time to five years has marginal impact, with the percentage student population of the whole growth area population dropping by 0.4% and still being over 26%. In respect of the schemes which are counted towards the 'pipeline' of student numbers supply the Council will keep this up to date. It will take account of any schemes that for whatever reason are considered not to have a realistic prospect of delivery and will provide advice to any prospective developer that requests it whether there is 'headroom' within the amount of PBSA that the Council</p>	<p><u>"Where a site promoter/ developer confirms that they no longer wish to pursue one of the PBSA schemes that has approval or has been agreed in principle, the Council will accept that the corresponding number of PBSA bedspaces can be accommodated in other development schemes. Prospective applicants are encouraged to engage with the Council periodically to clarify if such capacity exists."</u></p>

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				previously has indicated in principle it is comfortable with for new PBSA schemes to replace those that may drop out.	
20	Savills	1.1.4, 1.1.6, 1.7.2 and 1.7.4	<p>The application of a 20% buffer for the acceptable level of student population within a Growth Area is not strictly derived from 'policy' as described in the draft document. It is of note that this approach was not carried forward into the most up-to-date Local Plan, adopted in 2022. To apply this arbitrary cap here is not representative of the adopted development plan. The draft document, identifies that <i>'within Wembley Growth Area newer private rented homes are being wholly let to students at much higher levels than the rest of the borough'</i>, this, if anything, further emphasises that the <i>'substantial interest'</i> in PBSA in this location is warranted and currently unmet.</p>	<p>It is accepted that the 20% has not been defined in any current Brent Local Plan document, and although it was in the Wembley Area Action Plan it was not taken forward in the current BH7. However, whilst it may be considered by the representor to be arbitrary, examination of other local plan documents that seek to define a numeric threshold for over-concentration predominantly use a 20% student population/ or student to conventional dwellings figure, so it one that inspectors typically have considered to be acceptable elsewhere as well as also previously being acceptable for Wembley. In any case councillors have indicated that in the short to medium term from their perspective Wembley will not be a balanced and mixed community consistent with H15 and BH7, particularly if more student accommodation is provided for.</p> <p>In respect of private rented dwellings being let to students, this is something over which the Council currently has no control. It is however a more recent</p>	No change

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				phenomenon, reflective of the marketing and policies of the new institutional private rental operator that pre-dominates in Wembley Park together with higher-than-average rents compared to elsewhere in Wembley. These properties are challenging in terms of their affordability for many current Brent residents but less so for many foreign students with more substantial means. Rents are roughly the same as for PBSA with the same or higher levels of amenity/ facilities. There is no evidence that student occupiers of this accommodation would prefer PBSA and are displaced due to lack of supply. In any case, as conventional residential, such accommodation could easily revert to general needs housing which the Council contends is more sustainable in the longer term in any case in meeting Brent housing needs and sustainable communities.	
21	Resident 2	All	Support: A way should be found of incentivising the building of good-quality high-concentration dwellings for the long-term resident population rather than for a transient student population	Support welcomed. Most of the residential accommodation delivered in Brent is delivered as conventional homes, rather than student accommodation.	No change
22	Resident 3	All	Support: Too many PBSA being built.	Support welcomed.	No change

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23	Resident 4	All	Student accommodation is beneficial for our community and local businesses.	The PBSA statement acknowledges this but seeks to address the issue of over-concentration in particular areas.	No change
24	Resident 5	All	No comment but marked yes as agreeing with the draft statement.	Support welcomed.	No change
25	Resident 6	All	The focus should be on increasing the amount of social housing for current residents who are forced into private renting and who are in temporary accommodation and homeless.	The Council seeks to address specific housing need and provide for mixed and balanced communities in its planning policies. In respect of student accommodation, the statement seeks to prioritise either a financial contribution towards Brent priority affordable housing needs or using the viability of PBSA to help support conventional homes which will also include an element of affordable dwellings.	No change
26	Resident 7	All	Students are beneficial for our community and local businesses.	The PBSA statement acknowledges this but seeks to address the issue of over-concentration in particular areas.	No change
27	Resident 8	All	Support: Developers and the Council should have a joint funded programme to involve students with the local community to create a vibrant, cohesive and supportive relationship among everyone living in the area. Affordable housing development should be given priority.	Support welcomed. The statement seeks to support student inclusion in communities through developers of schemes setting out how their scheme will support students getting involved in voluntary activities with Brent residents and community groups. It will be for the developer to set out how they will deliver this, rather than the Council prescribing the solution that is proposed.	No change

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				It is agreed that affordable housing development should be a priority. In respect of student accommodation, the statement seeks to prioritise either a financial contribution towards Brent priority affordable housing needs instead of on-site affordable student accommodation, or using the viability of PBSA to help support conventional homes which will also include an element of affordable dwellings.	
28	Community Campaigner David Barton	All	An extensive representation essentially submitted in response to Council's development plan or supplementary planning document consultations setting out the merits of traditional architecture being greatly needed to reach the full potential of the area for residents, businesses and investors.	Further was sought and provided in respect of specific relevance to the contents of the draft PBSA statement. This confirmed a focus mainly in respect of the benefits of traditional architecture and as such is not specifically relevant to the PBSA statement.	No change
29	Arada	All	Questions rationale for 20% student population benchmark; seeks evidence of harm at higher proportions	The Council has reviewed other local plans and SPDs and generally if there is a specific percent identified for overconcentration of a student population or student housing, it usually around 20%.	No change
30	Arada	1.2	Supports monitoring but encourages continued PBSA delivery for regeneration benefits. Suggests there should be flexibility in site allocations to include PBSA.	The PBSA statement acknowledges the regeneration benefits of student accommodation. Site allocations do not specifically reference the type of residential accommodation that is appropriate, but a statement in the Brent Local Plan indicates that a range	No change

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				of residential accommodation types may be acceptable on any of the site allocations identified in the Plan. This is to provide flexibility related to developer/ market circumstances, albeit other policies such as BH7 address whether for example the use of a site for communal residential accommodation types might not be appropriate if its criteria are not met.	
31	Arada	1.3	Notes limited higher education presence in Brent but proximity to central London universities. Highlights emerging higher education projects (Northwick Park, Brent Cross). Cites CBRE report on PBSA demand exceeding supply; urges supportive approach to PBSA.	The Council has considered and accepts the role of Brent in meeting London's wider strategic needs for student accommodation taking account of the limited potential for additional supply in central London. The PBSA statement sets out the positives that student accommodation can bring to regeneration areas. However, this need also must be balanced up against Brent local housing needs which are also a Council priority, particularly for affordable homes. Currently it is principally Wembley Growth Area where the Council is seeking to pause PBSA delivery to ensure that longer term the population mix is not unbalanced and comes down to levels which the Council historically has been more content to support.	No change
32	Arada	1.8	Argues PBSA complements housing delivery (cross-subsidy, payments in lieu, relieving private rental pressure).	Across the whole of the London housing market area, there may be some merit in this argument. However,	No change

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			Warns against assuming resisting PBSA will yield more conventional housing. Advocates balanced approach to avoid stalled sites and reduced affordable housing delivery.	<p>in Brent student occupation of dwellings is below levels seen across much of London, particularly those areas with higher education institutions. As such, additional PBSA is increasing the borough's resident student population, not moving it out of conventional housing that can therefore become available to other Brent residents.</p> <p>The Council is not suggesting that its position on seeking a pause in additional PBSA in Wembley Growth Area above the significant amounts that have been delivered, approved or that it has indicated it has supported in principle will automatically yield more conventional housing. Issues associated with the delivery of conventional housing are more numerous and multi-faceted than that. The Council's Local Plan and the PBSA statement acknowledge that development is cyclical, and different sectors will perform well at different times. This is about the balance of Brent priority needs versus London's and about ensuring long term mixed and inclusive communities. Simply approving every site for PBSA principally because it delivers development and that must be good, ignores local needs and circumstances</p>	

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				and in the longer term is likely to make communities more resistant to development, rather than has generally been the case in Brent of being supportive.	
33	Arada	1.9	Supports integration measures (volunteering, partnerships).	Support welcomed.	No change