

Appendix B

Version for adoption showing proposed amendments to the document consulted upon with ~~strikethrough~~ for parts removed and underline for parts to be added.

Purpose Built Student Accommodation in Brent

~~Draft Planning Strategy Document~~
Position Statement
October January 2025



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Consultation Statement

This ~~draft Planning Strategy Document Position Statement~~ will be ~~was~~ subject to a 6-week period of consultation. ~~This will take place~~ between 23rd October and 4th December 2025. Consultation ~~will be~~ ~~was~~ consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 and for ~~Supplementary Planning Documents~~ and the council's Statement of Community Involvement (SCI).

The document ~~will be made~~ is available on the council's website, ~~as will the associated consultation statement which provides further detail on how the Council consulted, the number of responses and types of issues raised and how the Council addressed these matters and where it modified the position statement.~~

~~Although not identified as a Supplementary Planning Document (SPD) the fact that the position statement indicates how it will interpret current London Plan and Brent Local Plan policies and has been consulted upon in a manner consistent with a SPD, with the council considering representations and addressing them as set out in the consultation statement means that the Council considers it a material consideration in the determination of planning applications.~~

~~as well as in Brent Council libraries. The council will promote it through general awareness raising undertaken through media releases, its social media pages and on its website. In addition, the council will notify all relevant people and organisations on its planning policy consultation database.~~

~~Representations on the document can be made to:~~

[~~planningstrategy@brent.gov.uk~~](mailto:planningstrategy@brent.gov.uk)

~~Alternatively, you can write to:~~

~~Harry Burchill, Planning Policy Team Leader
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~~Representations should be received by the council by midnight 4th December 2025. Please reference the appropriate section and paragraph of the document for each individual comment that you make. Please note that the council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.~~

~~When reporting the consultation responses, organisation names will be referenced by the council. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the council of whether this document is adopted. Please also indicate if you would like to be informed of other planning policy consultations~~

by having your details put on our planning policy consultation database. This information will only be used in relation to consultations on the council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the council makes a decision on whether to proceed with the adoption of the document or not and has subsequently issued the appropriate notifications. Please see our privacy policy for more details.

Contents

1. Position Statement	2
1.1 Executive Summary	3
1.2 Existing Student Accommodation Policies	5
1.3 Higher Education Establishments and Brent	6
1.4 Brent's Other Housing Priorities	6
1.5 Purpose Built Student Accommodation (PBSA)	7
1.6 Wembley Growth Area	8
1.7 Brent's Short Term Position on PBSA	10
1.8 Addressing Brent's Priority Housing Needs Through PBSA	11
1.9 Creating Balanced and Mixed Communities Through PBSA	11

1. Position Statement

1.1

Executive Summary

1.1.1 Brent has had substantial growth in purpose-built student accommodation (PBSA) over the last decade. Wembley Growth Area has been particularly attractive to PBSA operators, with 7,675 bedspaces either built or under construction. Students represent approximately 21.8% of the Growth Area's current population.

1.1.2 For Wembley, a further 1,687 bedspaces are subject to applications or have been subject to positive pre-application discussions which are likely to become full applications where the principle of student use has been regarded as appropriate. If these are delivered in the short term (3 years) together with projected conventional housing completions, the student population would rise to 26.5%.

1.1.3 This percentage, if perpetuated for all future residential development activity in the period to 2041, is not considered by the council to be a balanced/ mixed community for the area. The 9,362 bedspaces are however acceptable in the context of the projected population of the Growth Area (with growth coming from conventional housing completions) to 2041. If this PBSA number remained the same, students would represent 20.6% of the Growth Area's population, which the council has previously in policy identified it is broadly content with.

1.1.4 Given the substantial interest in PBSA for Wembley, there is significant potential for further sites other than those already put forward to be promoted for PBSA in the short term. Due to this prospect, if current trends are perpetuated, the student population could go significantly above 20% by 2041. The council does not want to see this occur and the population become unbalanced longer term. As such, the council wishes to initiate a pause in this trend. It is unlikely to support further PBSA permissions for additional sites (outside those already submitted or in advanced pre-application discussions where the council has agreed the principle of PBSA) in the Growth Area. 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. 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.

1.1.5 The council is making this clear so that this will prevent prospective developers promoting PBSA schemes, with the associated resource risks, where there are places in London (and beyond) where that resource is more likely to result in a planning permission.

1.1.6 Notwithstanding Brent's limited higher education institutions, it does recognise it has a role in supporting provision of PBSA. In other Brent Growth Areas, whilst there has been some PBSA interest, the issue is not so acute in terms of percentage of the areas' future population. Currently there is no suggested potential for over-concentration for these areas. This, however, will be kept under review particularly if it becomes clear that students could become significantly more than 20% of a Growth Area's predicted population.

1.1.7 The council during the next three to four years is likely to have progressed its Local Plan review to a point where its policies might have some weight. This will provide greater clarity on how large the population of the Wembley Growth Area is likely to be. It will also allow a move towards a more clearly defined policy approach on the acceptable level of student population the council supports in Growth Areas.

1.1.8 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. In this respect it will seek to pursue a financial contribution towards affordable housing to meet the borough's needs, rather than the PBSA scheme delivering affordable student accommodation.

1.1.9 For potential PBSA sites outside the Wembley Growth Area that have not yet been subject to pre-application discussions, the council will encourage schemes that support the delivery of more conventional homes, priority housing such as specialist older person's housing (as set out in Policy BH8), and affordable housing that can meet Brent's needs. This could include the delivery of a separate affordable housing block, rather than affordable student bedspaces. Where these options are not feasible, the council will seek a financial contribution to affordable housing. All these options will be prioritised over the provision of affordable student accommodation.

1.1.10 The council wishes to encourage greater interaction between PBSA students and the wider community to create mixed and inclusive neighbourhoods in Brent. In this respect it will support PBSA schemes that promote student engagement in local life, for example through volunteering and collaboration with residents and third-sector organisations, to enhance Brent's social, economic and environmental outcomes.

1.2

Existing Student Accommodation Policies

- 1.2.1 The London Plan 2021 Policy H15 and the Brent Local Plan 2022 Policy BH7 support the provision of additional student accommodation. Both policies recognise that Purpose Built Student Accommodation (PBSA) meets a London wide need for student accommodation. In terms of an appropriate spatial distribution, neither policy sets a specific limit on what might be considered acceptable. Policy H15 is supportive provided that "at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood", whilst BH7 is too, providing that it "will not lead to an over-concentration of the type of accommodation in the area."
- 1.2.2 Brent's Local Plan identifies that site allocations for residential purposes are appropriate to accommodate a wide range of residential uses including PBSA. It does not seek to identify or prioritise specific sites for any form of homes, including PBSA.
- 1.2.3 The council is aware that in economic cycles, the residential accommodation types which are most attractive to the investment or developer community will vary, with specific sectors, e.g. PBSA, being more attractive at certain times, whilst at other times, smaller homes, or larger family homes may be more attractive.
- 1.2.4 The Local Plan policies have been loosely framed to allow for flexibility and be able to support development in what might be changing economic conditions, or changes in preference of site characteristics for residential providers.
- 1.2.5 More recently, the Mayor of London's London Plan Guidance on Purpose Built Student Accommodation was published in November 2024. It acknowledges that some boroughs, including those in outer London, have seen a particularly high influx of PBSA schemes in recent years. It identifies that in some boroughs this has given rise to concerns about housing mix in their neighbourhoods and the potential 'crowding out' of conventional housing, given other types of housing need amongst their population.

1.3 Higher Education Establishments and Brent

- 1.3.1 The Local Plan policies have been loosely framed to allow for flexibility and be able to support development in what might be changing economic conditions, or changes in preference of site characteristics for residential providers.
- 1.3.2 Brent has only one small campus of a higher education establishment (University of Westminster at Northwick Park). This has some PBSA on site (150 bedspaces) and is subject to an outline planning permission that would allow more. Many of the higher education institutions are in central London, where there are significant constraints to finding new sites for PBSA. Parts of Brent have good transportation links to central London, and it is recognised that Brent has a role to play in delivering PBSA to support London's higher education facilities.

1.4 Brent's Other Housing Priorities

- 1.4.1 There is an intense lack of supply of homes in Brent, with a particularly acute affordable housing need. New supply has also diminished in the last year or two due to a range of housing delivery factors, prevalent across much of London. On the other hand, the council has seen the number of people presenting as homeless increase exponentially in this time. This means that the council is finding it very hard to house people. It is increasingly having to place people in temporary accommodation in Brent or, in a growing number of cases, elsewhere.

1.5

Purpose Built Student Accommodation (PBSA)

- 1.5.1 For new major developments over the last two years, PBSA has become more predominant as the proposed residential typology. The principal interest has been within Wembley Growth Area. Interest in other areas has to date been more limited, albeit PBSA schemes are currently being proposed in Neasden (1,040 bedspaces), Northwick Park (800 bedspaces) and Cricklewood (826 bedspaces) with other Growth Areas subject to pre-application discussions.
- 1.5.2 In some cases, sites with housing consents are being promoted for PBSA instead. Given the acute local housing need, there are concerns from councillors that Brent's ability to meet its priority housing needs are being displaced by accommodation that does not specifically meet Brent's needs.
- 1.5.3 PBSA operators often indicate that their premises will help free up places in existing dwellings occupied by students to meet wider housing needs. This is difficult to verify, as Brent is part of the wider London housing market. Meaningful comparison between the last two census is difficult as it appears Census 2021 has significantly under-represented higher education students living in Brent. Whilst it may be true there may be some transfer, for the most part it is considered that new PBSA adds to Brent's student population, rather than effectively redistributing it by making more homes available for Brent's general housing needs. It is not clear if there is a direct link, but it is also possible PBSA in Wembley has encouraged more student occupation of conventional homes. Within Wembley Growth Area newer private rented homes are being wholly let to students at much higher levels than the rest of the borough. This might be through those considering PBSA becoming aware of the availability of homes in Wembley, or occupants when leaving PBSA moving into homes.

1.6

Wembley Growth Area

- 1.6.1 Brent has seen a substantial increase in PBSA over the last 12 years and Wembley has been the place to date where this has principally occurred. Here there are now (June 2025) 6,058 PBSA bedspaces constructed. These have been in Wembley Park. A further 1617 bedspaces are under construction (most along Wembley High Road). Planning committee has been minded to grant 759 more bedspaces in Wembley Park, subject to an appropriate s106 obligation. In total this is 8,434 student bed spaces.
- 1.6.2 Within the Wembley Growth Area there are currently (as of June 2025) 12,130 dwellings. Most of these properties are smaller in terms of number of bedrooms than the Brent average. This is because nearly all homes are flats, most are medium/high rise, and recent developer focus has been on one and two bedroom homes. Relatively few homes are social rent (typically highest levels of occupancy per bedroom), some are owner-occupied (typically with the lowest levels of occupancy per bedroom), and the majority are privately rented.
- 1.6.3 Determining a definitive population of the Wembley Growth Area is not easy. Its boundaries are not contiguous with any wards or smaller census output areas. The council has therefore estimated the existing and future population using 2021 Census data for the Wembley Park ward. It is considered that this provides the best ability to estimate average occupation of dwellings across the Growth Area. It is almost 100% flats, which is similar across the wider Growth Area. Future development in the area in terms of housing type, sizes and affordable ratios is likely to be like that already delivered. The council is using an assumed occupancy level of 2.16 people per dwelling, which is the average household size for Wembley Park ward.
- 1.6.4 When looking at the 12,130 dwellings in the area, 452 are currently subject to whole Council tax discount due to their occupation by students.
- 1.6.5 This gives a non-student population in Wembley Growth Area of 25,244 in dwellings.
- 1.6.6 The student population in dwellings is an estimated 976 (assuming the same household size as conventional homes occupation). When added to the number of students in PBSA, this gives a total of 7,034 students. As a proportion of the overall population, students currently represent 21.8%.

1.6.7 The increased interest in PBSA, however, has meant that with recent permissions yet to be completed, minded to approves¹, current planning applications and relatively advanced PBSA pre-application discussions, a further 3,304 student rooms could be supplied in the next three years. This would lead to 9362 student rooms in the Growth Area. It is anticipated that 1,871 dwellings will be completed in the next three years. If students occupy a similar proportion of these dwellings as currently, this will result in 151 additional students. This would lead to a student population of 10,489, compared to the non-student population of 29,115. Thus, students would comprise 26.5% of the overall population.

1.6.8 If no more student schemes were to come forward in the period to 2041 and all other housing sites were delivered (5,422 dwellings have consent, 2,429 dwellings are allocated and 517 bedspaces are in a co-living scheme), the population would increase by 19,732. Of these, the student population would represent 736. The overall proportion of students would drop to 20.6% of the 2041 total population. This is more consistent with the amount that the council previously in the Wembley Area Action Plan indicated it would regard as an acceptable concentration within the Growth Area.

1. Planning applications which Brent's planning committee have voted to approve subject to the resolution of outstanding matters, for example the completion of a legal agreement.

1.7

Brent's Short Term Position on PBSA

1.7.1 Given the substantial interest in PBSA for Wembley there is significant potential for further sites to be promoted for PBSA by developers/landowners, or PBSA providers. These parties would usually enter into pre-application discussions before submitting a planning application to the council.

1.7.2 For the Wembley Growth Area, the council is concerned about the prospect of the student population to 2041 rising significantly above 20% if the current PBSA trends are perpetuated. The council is therefore unlikely to support PBSA permissions for additional sites (outside those already in advanced pre-application discussions where the council has agreed the principle of PBSA) in the Growth Area. 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. 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.

1.7.3 The council is making this clear to prospective developers to reduce the risk of wasted resources. It would encourage those promoting PBSA to target other places in London where the resource, time and effort is more likely to result in a planning permission.

1.7.4 Notwithstanding Brent's limited higher education institutions, it does recognise that it has a role in supporting the provision of PBSA. In other Brent Growth Areas, whilst there has been some PBSA interest, the issue is not so acute in terms of percentage of the areas' future population and a risk of over-concentration occurring. Currently there is no suggested pause for these areas, although this will be kept under review particularly if it becomes clear that students could become more than 20% of the Growth Area's population. PBSA schemes proposed in these areas would be robustly assessed against the relevant policies and guidance in place.

How long will the council maintain the view that it will not support additional PBSA in the Wembley Growth Area?

1.7.5 The council has set out its timetable for the Local Plan review. It is estimated that it will take three to four years for the draft replacement Plan to progress to an advanced stage where some weight can be attached to its policies. This will provide greater clarity on how large the population of the Wembley Growth Area is likely to be. It will provide a more clearly

defined policy approach on the acceptable level of student population the council will support in Growth Areas. This might provide the opportunity for it to identify that more PBSA in the area might be appropriate or confirm the current position that a point has been met beyond which additional provision will be regarded as an over-concentration and not supported in policy.

1.8

Addressing Brent's Priority Housing Needs Through PBSA

- 1.8.1 For PBSA schemes ~~yet to be determined~~, the council wishes to better address its own local housing priorities, particularly in delivering affordable housing. In this respect it will seek to prioritise a financial contribution towards affordable housing to meet the borough's needs, rather than the PBSA scheme delivering affordable student accommodation.
- 1.8.2 For sites outside the Wembley Growth Area that have not yet been subject to pre-application discussions, The council will look more favourably on schemes that support the delivery of more conventional homes, priority housing such as specialist older person's housing (as set out in Policy BH8) and affordable housing that meets Brent's needs. Alternatively, it will also look favourably on PBSA-led schemes that deliver a separate affordable housing block, rather than affordable student spaces.

1.9

Creating Balanced and Mixed Communities Through PBSA

- 1.9.1 Policy H15 is supportive of PBSA provided that "at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood". This requirement goes beyond demographic

characteristics and relates to how occupants contribute to, and engage with, their neighbourhood. The council wishes to encourage greater interaction between PBSA students and the wider community in Brent. To this end, it will support PBSA schemes that enhance student involvement in local life, for example, volunteering and collaboration with residents and third-sector organisations, to improve Brent's social, economic and environmental outcomes.

1.9.2 Many Higher Education and affiliated organisations already provide such

opportunities, and the council would welcome their expansion to create more opportunities in Brent.

1.9.3 In addition, the London Plan Guidance on Purpose Built Student Accommodation recognises that publicly accessible uses within PBSA developments (such as shops, community facilities and meeting spaces), can benefit the local community while also offering students employment and volunteering opportunities. For example, in Lewisham, Phoenix Community Housing has partnered with Goldsmiths, University of London, to deliver a "good neighbours" scheme where students support residents aged 55 and over. The council would support similar initiatives that promote student inclusion.

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