

3 February 2025

Mike Rowson
Durham County Council Planning Development
PO BOX 274
Stanley
County Durham DH8 1HG

Dear Mr Rowson,

**Planning application DM/24/02972/FPA: conversion of
Hallgarth Care Home to purpose built student accommodation**

The City of Durham Trust objects to this planning application and asks you to refuse it because it does not meet the requirements of policies 16, 29 and 31 of the County Durham Plan.

We provided our full grounds for refusal in our letter of 27 November 2024, including a detailed consideration of housing need using the terms of the draft Housing Needs Supplementary Planning Document. We stand by all of those grounds for refusal, but address below the applicant's response dated 14 January 2025.

The applicant's response states that their submission "*clearly demonstrate that the application proposals comply with the requirements of Policy 16, however, in the interests of completeness, we have sought to address the requirements of the SPD below, as requested*".

The City of Durham Trust rejects that claim. In our objection letter of 27 November 2024 we pointed out the many discrepancies and omissions that led to the applicant claiming a shortfall of 1,400 beds between what is actually available and what is needed. The response submission now states that "*The revised assessment tables contained above confirm that, even using the university figures provided and incorporating the 'committed' developments at Melbury Court and Mount Oswald, there remains a need for between 1,037 and 2,119 additional bedspaces to achieve a bed ratio of 1.5 students for the 27/28 academic year.*"

It is all too obvious that this is an utterly contrived portrayal of the need for student accommodation here.

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The applicant's original submission's claim of a 1,400 shortfall was considered in the appeal against refusal hearing held on 14 May 2024 from which the Inspector concluded in his dismissal letter of 20 August 2024, paragraph 47, that:

"Given the above, I am not satisfied that a need for further PBSA has been demonstrated."

The applicant's revised figures fail to correct the figures for the number of students requiring accommodation (still quoting 2023/24 instead of the lower figures in 2024/25) but do include the existing accommodation that had been originally ignored. Further, the revised figures include accommodation "in the pipeline". Despite this additional supply, the revised submission still declares a shortfall. This puzzling outcome not only disregards the Appeal Inspector's judgement and his reasoning, it also depends upon an artificial multiplier, as follows.

Having reached figures of supply and demand that show a surplus, not a shortfall, the applicant creates a shortfall on the basis that *"the proportion of PBSA bedspaces to students is significantly below that of other university cities and the industry recommendation of 1.5 students per PBSA bedspace."*

Durham University's special qualities include being a Collegiate university. There are over 7,500 students accommodated in the University's Colleges and some 2,600 students in private PBSAs. Applying some generic "industry standard" ratio derived from figures for all universities in the country, most of which are not collegiate, is an irrelevant and misleading attempt to create a shortfall where none exists.

Durham University itself provides the authoritative proof that the amount of student accommodation more than meets demand. Their public statement is appended to our letter and concludes *"there will be enough student housing in Durham City to meet demand."* The City of Durham Trust is confident in re-stating that the proposal clearly fails Policy 16.2 of the County Durham Plan.

On the comprehensive grounds set out in our objection letter of 27 November 2024 and on the above response to the supplementary submission made by the applicants on 14 January 2025, the City of Durham Trust considers that the application should be refused.

Yours sincerely

John Lowe

Chair of the City of Durham Trust

Summary of the Durham University in-year analysis of student housing supply and demand

Copied from <https://www.durham.ac.uk/colleges-and-student-experience/housing-hub/housing-analysis/> on 25 January 2025

In the early months of the year we undertake an annual data analysis exercise alongside colleagues from Durham County Council (DCC), to seek to clarify the student housing market capacity in Durham City.

You can use this information to support you when making a decision on your housing options, and how and when you search for a home if you choose to rent in the private sector.

Overview of Student Housing Market

There are three elements to the student housing market in Durham City:

- University owned or managed accommodation – this encompasses all our ‘College’ accommodation and sometimes includes private accommodation which we have leased for the purposes of housing students who want to be housed with the University. There are a variety of room types, rent levels, catering options and facilities at each College. Some Colleges also operate commercial lets and tenancy options at these Colleges will reflect this.
- Purpose Built Student Accommodation (PBSAs) – these are larger buildings which house circa 100 or more bedrooms. Overall Durham city has 13 PBSA sites with 3078 bedspaces between them. Typically they have services on site, a variety of study and social spaces and rents include all bills. Rooms will typically be let on an individual basis, and room types are usually studio, or ensuite study bedrooms with shared living facilities (cooking / dining / living areas). Most of the time you are there all your neighbours will be students however it is worth noting this may not be the case all year round.
- Student Lets / Private Rented Sector Housing – there are around 2,530 private properties in the DH1 postcode area (Durham city and surrounding neighbourhoods) which are available to let exclusively to students. The most common type is in HMOs (Houses in Multiple Occupation), where 3 or more tenants will have a joint tenancy in what is commonly referred to as a ‘house share’. These have 3 or more bedrooms and usually share bathroom(s), living, kitchen and dining spaces. Some have outdoor spaces such as gardens or yards, driveways, garages etc. Even in areas with a dense student population you will still live alongside permanent city residents as part of the wider community.

Supply

College and PBSA accommodation is simple to quantify precisely, since the University knows how many beds it has across its estate, and we have the precise number of beds in each PBSA.

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In 23/24 there were 7855 bedspaces available in University owned/managed accommodation (this includes some PBSAs or rooms in PBSAs where the University has leased them) and 2,502 in PBSA.

Understanding the amount of accommodation available in student lets is more complex and less accurate – although we do a lot of work to ensure the data is as accurate as it can be. We use two main sources of data:

1. University data from Banner of students' own self-reported term-time address.
2. DCC data on Class-N Council Tax exempt properties, which are exempted from council tax because they only have student residents. DCC's data includes the number of students at each such property.

Neither of these sources of data is completely accurate - students may not update their Banner record accurately or when they move properties from one year to the next; and some houses which are recorded as being exempt may not be, or there may be students living in houses with some non-students, in which case the property wouldn't be exempt and therefore not included in this analysis.

By comparing the two sources of data, alongside the total number of students we know are living in the DH1 postcode area (again, not perfect since it relies on self-reported information), we have been able to produce the most accurate picture of student housing supply that has been produced for Durham - with an upper and lower range within about 5% of the total City supply.

That data showed that in 23/24 there were approximately 8,437 bedspaces in student lets in the private rented sector.

Together with the University owned/managed accommodation and PBSA figures, there was therefore a total of 18,794 bedspaces in the DH1 postcode area.

We will repeat this data exercise each year, but there are no indications at this point that supply has changed significantly in 23/24 in the PBSA or private rented sector.

In terms of other factors affecting overall total bedspaces in the city, firstly we anticipate one new PBSA scheme to be available to let in 25/26. Secondly, there has not currently been any reported contraction of the student lets side of the market. And finally, the University has a number of additional bedspaces offline in 24/25 for refurbishment and as a result of our development plans, which should be back online in 25/26.

Demand

In 23/24 the University had a total of 21,588 students, of which 20,814 were full-time. Looking at our position on the capacity of the city at the start of 23/24, and comparing this to the in-year analysis we are confident that our numbers stand up to scrutiny.

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There has been enough accommodation in the city for everyone who wanted this year. There were 18,448 students living in the City in 23/24, and we estimated around 350 bedspaces would remain available in the city.

In 24/25 planned total student numbers are expected to be similar to 23/24, however actual total student numbers for 24/25 are not released until after the 1 December census date. We do know that there has been enough accommodation in the City for the 24/25 academic year for everyone who wanted it, and sought to secure accommodation for the new academic year. In fact, there were still at least 100-200 vacant bedspaces being advertised in September.

Total student numbers for 25/26 are expected to be similar to 24/25, and so it can be reasonably expected that demand for accommodation in the City will be similar to this year.

Taking all this into account and considering it against forecasted student number data for 25/26 we are confident there will *be enough student housing in Durham City to meet demand*.
