



Newcastle-under-Lyme Local Plan Examination

Matter 5: Housing Land Supply

May 2025



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01260 288888

MATTER 5 HOUSING LAND SUPPLY

Issue 5 - Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and do these align with national policy?

5.1 Are the assumptions that have been made to inform the trajectory justified in relation to the delivery of housing sites, in particular in relation to: a) lead in times for grant of full permissions, outline and reserved matters and conditions discharge; b) site opening up and preparation; and dwelling build out rates?

1.1.1 This is a question for the Council to provide a detailed response to.

5.2 Is there a reasonable prospect that a total of 1648 new dwellings will be provided on sites that had planning permission at March 2024?

1.1.2 It is difficult to fully understand which housing sites comprises the 1,648 new dwellings component included in examination document EX/NBC/07. It is assumed this includes the following housing land supply components as of 31st March 2025; draft housing allocation sites with detailed planning permission, windfalls, sites with detailed planning permission (5+ dwellings and <5 dwellings sites), sites with outline planning permission, purpose-build student accommodation sites, elderly care sites and change of use sites.

1.1.3 Gladman will reserve its position on this question until we see the Council's response to this question within its Matter 5 Hearing Statement.

5.3 Is there a reasonable prospect that the total of 5195 new dwellings to be delivered through Local Plan allocations?

1.1.4 Gladman argue that the delivery of 5,195 dwellings to be delivered on all the draft local plan housing allocation sites is highly optimistic. The vast majority of the draft housing allocations included within the Local Plan are situated in the Green Belt and some are expected to be subject to highly contentious views from interested parties, and will be discussed in more detail during the Matter 3 and Matter 6 hearing sessions.

5.4 Is there compelling evidence to justify a windfall allowance of 756 over the plan period and to demonstrate that they will provide a reliable source of supply?

1.1.5 The Council uses a windfall allowance of 62.67 dwellings in examination document ref: EX/NBC/04 which shows the past trends in windfall site completions since 2008 (2008-2023). This has been rounded up to 63 dwellings as shown in examination document Appendix 2 of EX/NBC/04 (208/29-2039/40). Although windfall site completions data for monitoring years 2023/24 and 2024/25 has not been provided by the Council, it is acknowledged that the 62.67 dwellings per annum windfall allowance is based on a robust past trends evidence dataset.

1.1.6 In light of the above, Gladman accept that compelling evidence has been provided by the Council to justify a windfall allowance of 756 dwellings over the plan period.

5.6. What assumptions have been made in relation to the provision and delivery of student housing? Are these consistent with national policy?

1.1.7 In the Council's updated 'Housing land paper and trajectory' which uses a 1st April 2025 base date¹, the no. of dwellings anticipated to be delivered from Student Accommodation sites (housing release onto market from deliverable student provision) in the immediate five-year period is 508 dwellings. This includes provision from the following sites 1) Former Jubilee Baths, 2) Horwood Lindsay and Barnes Hall, Keele University and 3) Morston House, Newcastle-under-Lyme.

1.1.8 An extract of the Housing Land Supply Statement of Common Ground² between Gladman Developments Ltd and Newcastle-under-Lyme Borough Council (January 2025), which discusses the issue of the inclusion of purpose built student accommodation within the Council's deliverable housing land supply is included at Appendix 1 to this Hearing Statement.

¹ Examination document EX/NBC/04 'Housing land paper and trajectory' - <https://www.newcastle-staffs.gov.uk/downloads/file/3032/housing-land-paper-and-trajectory>

² Housing Land Supply Statement of Common Ground. PINS ref: APP/P3420/W/24/3354312 Land south of Eccleshall Road, Loggerheads

a) Having regard to assumptions about commitments, allocations and windfalls the housing requirement across Newcastle under Lyme between 2020 and 2040 is likely to be met?

b) A 5 year supply of deliverable housing land will exist on adoption?

c) The Plan provides specific, developable sites to provide a supply of deliverable or developable housing land is likely to exist throughout the plan period?

1.1.9 In response to question 5.7 a), examination document EX/NBC/04 states that there is a total supply of housing of 9,670 dwellings over the 2020-2040 plan period, which equates to a flexibility allowance of 21%. Gladman consider this to be sufficient as it would provide comfort in the event that some of the draft housing allocation sites don't come forward in the timeframe which the Council anticipate them to do so over the plan period.

1.1.10 It is pertinent to note that over 60% of Newcastle-under-Lyme borough is constrained by Green Belt so there is a finite number of suitable sites available on the edge of sustainable settlements (outside the Green Belt) for speculative residential applications to be submitted on and approved to address any significant shortfall in housing delivery over the plan period.

1.1.11 In response to question 5.7 b), it is currently unknown whether the Council will be able to demonstrate a robust five-year housing land supply upon adoption of the Local Plan. The five-year housing land supply period at the time of adoption will either be 1st April 2025 – 31st March 2030 or 1st April 2026 – 31st March 2031, depending on when the Local Plan is anticipated to be adopted by the Council.

1.1.12 Firstly, the examining Inspector will need to arrive at a decision about whether the proposed annualised requirement of 400dpa set out by the Council in Policy PSD 1 is the correct housing requirement for the borough. Examination document EX/NBC/04 sets out that **either a 11.3 or 10.1 years supply** can be demonstrated by the Council against the proposed 400 dpa housing requirement, depending on whether Student Accommodation is included within the deliverable supply. In either scenario, the Council

claim to have a deliverable housing supply well in excess of 2,000+ dwellings above the minimum five-year requirement of 2,100 dwellings (including a 5% buffer).

- 1.1.13 Secondly, Gladman contend that 2,321 dwellings within the Council's deliverable housing supply does not benefit from either outline planning permission or detailed planning permission. The vast majority of the sites are draft housing allocations without planning permission, with a few sites with planning applications which benefit from a resolution to grant. The sites will be discussed in more detail during the Matter 5 hearing session to determine whether they meet the definition of deliverable as set out in Annexe 2 (Glossary) of the Framework.
- 1.1.14 It is pertinent to note that the Council agreed in a Housing Land Supply Statement of Common Ground in January 2025 prior to the public inquiry of 'land south of Eccleshall Road, Loggerheads'³ that it could only demonstrate a **3.08 years supply** (deliverable supply of 1,760 dwellings) against the Council's Local Housing Need figure of 545 dwellings per annum. Gladman's position was **2.26 years** and this reduced the Council's deliverable supply to 1,281 dwellings. At the time of writing, the appeal decision has not been issued so it is unknown whether the Inspector will comment on the topic of housing land supply within his appeal decision.
- 1.1.15 Appendix 2 of EX/NBC/04 states that there have been 2,071 housing completions in the borough within the first five monitoring years of the Plan (2020-2025). This differs to the figure of 2,219 net housing completions figure included in examination document EX/NBC/07 'PSD3 Query'. Gladman kindly request some clarity on which net housing completions figure is correct. If the 2,071 housing completions figure is correct, this would result in a surplus of +71 dwellings against the proposed annualised housing requirement of 400 dpa in the Local Plan.
- 1.1.16 As the proposed annualised housing requirement of 400 dpa is less than 80% of the local housing need calculated using the standard method updated in March 2025 of 550dpa (it is 72.7%), a 20% buffer will apply from 1st July 2026 (irrespective of the latest

³ Appeal ref: APP/P3420/W/24/3354312

Housing Delivery Test result) as set out in paragraph 78c of the December 2024 Framework.

Appendix 1 – Extract from agreed Housing Land Supply Statement of Common Ground between Gladman Developments Ltd and Newcastle-under-Lyme Borough Council discussing Purpose Built Student Accommodation (January 2025) Appeal ref: APP/P3420/W/24/3354312

Statement of Common Ground re 5 Year Housing Land Supply

Between Gladman Developments Limited and Newcastle-under-Lyme Borough Council

Appeal against the non-determination of an application for outline planning permission
for the construction of up to 150 dwellings - Land south of Eccleshall Road,
Loggerheads

References: APP/P3420/W/24/3354312 and 24/00162/OUT

Address: Land south of Eccleshall Road, Loggerheads

Client: Gladman Developments Limited

Date: 15 January 2025

Authors: Ben Pycroft on behalf of Gladman Developments Ltd and Newcastle-under-Lyme
Borough Council

3. Matters not agreed

Student Accommodation – matters of agreement

Relevant guidance

- 3.1 The PPG was first published in March 2014. Paragraph 3-038 of the original version of the PPG stated (under Housing Land Availability Assessments: *“How should local planning authorities deal with student housing?”*):

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.”

- 3.2 The PPG was then updated in September 2018. Paragraph 3-042 of the September 2018 update stated (under the heading *“How should authorities count student housing completions?”*):

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Local authorities should take steps to avoid double-counting.

To establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data. This should be applied to both communal establishments and to multi bedroom self-contained student flats. Studio flats in mixed developments designed for students, graduates or young professionals should be counted as individual completions. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.”

- 3.3 Both parties agree that the relevant paragraph of the current PPG is paragraph 68-034, which was last updated on 22nd July 2019 and is in chapter 68 of the PPG: “Housing Supply and Delivery”. It contains the Government’s current guidance on how student accommodation can be counted in the 5YHLS. It states:

“How can authorities count student housing in the housing land supply?

All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply based on:

the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or

the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.

Paragraph: 034 Reference ID: 68-034-20190722

Revision date: 22 July 2019”

3.4 Both parties agree that how student housing needs can be assessed is addressed in a different chapter of the PPG (chapter 67: “Housing needs of different groups”).

3.5 Paragraph 67-001 of the PPG states:

“How do the housing need of particular groups relate to overall housing need calculated using the standard method?

The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups. This guidance sets out advice on how plan-making authorities should identify and plan for the housing needs of particular groups of people.

This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. How can needs of different groups be planned for?

Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);

the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and

the anticipated deliverability of different forms of provision, having regard to viability.

Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.

Further advice in relation to the housing needs of specific groups is provided in other sections of this guidance, see the separate guidance on older and disabled people, and the Planning policy for traveller sites.

Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.

When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.

The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in Planning policy for traveller sites.

Paragraph: 001 Reference ID: 67-001-20190722

Revision date: 22 07 2019”

3.6 Paragraph 67-004 of the PPG states:

“How can student housing needs be assessed?

Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.

Paragraph: 004 Reference ID: 67-004-20190722”

Implications for Newcastle-under-Lyme’s 5YHLS

- 3.7 The Council includes 3 sites for Purpose Built Student Accommodation (PBSA) in its 5YHLS. These sites would provide 1,113 bedrooms for students, which the Council considers would release 479 dwellings in the wider housing market (by allowing existing properties to return to general use and / or allow general market housing to remain in such use rather than being converted for use as student accommodation. The three sites are set out in the following table.

Table 3: PBSA sites in the Council's 5YHLS

Reference	Address	No. of net bedrooms	Dwellings in the Council's 5YHLS
TC14	Former Jubilee Baths, Nelson Place	208	208
KL28, KL29 & KL30	Horwood, Lindsay and Barnes Hall, Keele University	406	168
TC26	One London Road (former Bristol Street Motors)	499	103
	Total	1,113	479

- 3.8 Both parties agree that the inclusion of PBSA in Newcastle-under-Lyme's 5YHLS equates to 0.83 years' worth of the Council's supply (i.e. 479 / 572).
- 3.9 Both parties agree that 479 dwellings included because of PBSA represents 27% of the Council's 5YHLS (i.e. $479/1,760 \times 100 = 27.22\%$).
- 3.10 Both parties agree that whether PBSA is included or not then the Council cannot demonstrate a 5YHLS by a significant margin as set out in table 2 and paragraphs 2.18 and 2.19 above.

Completions data

- 3.11 Both parties agree that the Council includes student accommodation in its completion data. Examples include:
- TC26 – 224 “dwellings” because of 224 studio apartments completed in 2021/22 and 176 “dwellings” because of 176 studio apartments completed in 2020/21 at London Road (former Bristol Street Motors);
 - TC36 – 211 “dwellings” because of 211 studio apartments completed in 2020/21 at the Met (Former Savoy Cinema); and
 - TB7 – 112 “dwellings” because of 112 studio apartments completed in 2020/21 at The Orme.

Previous 5YHLS statements

- 3.12 Both parties agree that the Council's 5YHLS position statements at 1st April 2019 and 1st April 2020 included separate calculations with and without student accommodation.

Recent appeal decisions in Newcastle-under-Lyme

3.13 Both parties agree that there have been three relatively recent appeal decisions in Newcastle-under-Lyme where the inclusion of student accommodation in the 5YHLS has been considered. The appeal decisions were considered within the context of the current version of the PPG. The first two appeals were determined through the written representation procedure, whilst the third was determined through public inquiry.

3.14 The first appeal decision relates to Croft Farm, Stone Road, Hill Chorlton, Newcastle-under-Lyme and is dated 2nd August 2019¹. In that case, Inspector Alexander Walker found that the Council's position at 1st April 2018 relied heavily on student accommodation freeing up market housing. Paragraph 20 of the appeal decision states:

"The Council state that they can demonstrate a five year supply of deliverable housing land. The appellants dispute this on the basis that there has been a consistent under delivery between 2011 – 2017, with the exception of 2016 whereby the figures have not been produced. Furthermore, the Council's Five Year Housing Land Supply Statement 2018-2023 relies heavily on student accommodation freeing up market housing. The appellants refer to a previous appeal decision where by the Inspector concluded that student accommodation should not be included as part of the housing land supply as there is no evidence to indicate that it would release market housing. The Council does not dispute this. There is no evidence before [me] to indicate that students would migrate from houses to purpose built student accommodation, particularly to the extent that the Council seem so heavily reliant upon. Based on the evidence before me, given the consistent under delivery of housing and that the Council rely so heavily on student housing, I find that the Council cannot demonstrate a five year supply of housing land."

3.15 The Council's position at 1st April 2018 was that it could demonstrate a deliverable 5YHLS of 2,431 dwellings. Of these, 789 (32%) were houses that the Council claimed would be released as a result of student accommodation. As above, the Croft Farm Inspector found that the Council's 5YHLS heavily relied on student accommodation. The Inspector held that there was no evidence before him to demonstrate that new purpose built student accommodation (PBSA) would lead to a migration of students from houses to the PBSA.

3.16 The appeal decision referred to by the Appellants in the Croft Farm case (mentioned by the Inspector in the above quotation) relates to land at Home Farm, Church Hill, Pinhoe, Exeter dated 29th October 2014². This decision was made under the first version of the PPG as discussed above.

¹ PINS ref: 3225154 – core document **7.05**

² PINS ref: 2215771 – core document **7.06**

- 3.17 In the Pinhoe case, the Inspector concluded that student accommodation should not be included as part of Exeter’s housing land supply because of a considerable increase in the number of students relative to the purpose built student accommodation. Paragraph 47 of the Pinhoe appeal decision states:

“Where the student population is relatively stable, and the number of general market dwellings occupied by students declines as a consequence of the provision of student accommodation, I consider the inclusion of such accommodation as part of the housing supply would be consistent with the guidance within the PPG. However, within Exeter, due to the considerable increase in the number of students relative to the provision of purpose-built student accommodation, there has not been a reduction in the general market dwellings occupied by students. On the contrary, there has been a significant increase. I acknowledge that this situation may change in the future should the delivery of student accommodation significantly increase in the size of the student population. However, that is not the case at present and there is no evidence to show that the provision of student accommodation has released general market housing within Exeter. Therefore the inclusion of purpose-built student accommodation as part of the housing supply is not consistent with the advice at paragraph 3/38 of the PPG”

- 3.18 Exeter Council challenged the decision in the High Court but was unsuccessful.

- 3.19 The second Newcastle-under-Lyme appeal decision relates to land to the north of the A51, south of Chorlton Mill Lane and west of the railway, Stableford, Newcastle-under-Lyme, dated 23rd February 2022³. In that case, Inspector S Dean found that student accommodation could be included in the Council’s 5YHLS. Paragraphs 44 to 47 of the decision state:

“44. The appellant is concerned with the approach of the Council to including student accommodation in the supply figures, and I note that this issue was considered by the Inspector in the Croft Farm decision, albeit some time ago and on evidence older than that before me in this appeal. Whilst I recognise that consistency in decision-making is important, I must make my decision on the basis of the evidence before me at the time I make it. In that previous appeal, the Inspector found that student housing made up a substantial portion of the supply, and their conclusions flowed from that finding. On the face of the evidence before me, I do not find the same.

45. The Council provides two figures for its housing-land supply; including and excluding student accommodation, both of which are in excess of five-years. If I were to exclude the sites in the Council’s Housing Land Supply Site Schedule with which the appellant takes issue, then the level of supply including student accommodation would still be in excess of five-years, but the level of supply excluding it would not be.

46. The Planning Practice Guidance (the PPG) is clear that student accommodation can count towards the housing land supply, based on the amount of accommodation that new student housing releases in the wider housing market (by allowing existing

³ PINS ref: 3263918 – core document **7.07**

properties to return to general residential use); and/or the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

47. As such, I am satisfied that for the purposes of this decision it is appropriate for the Council to include student accommodation in its housing land supply figures. Setting aside for now the list of disputed sites from the appellant, the amount of student accommodation does not appear to be so substantial that it greatly distorts the overall level of supply, by making an otherwise insufficient supply sufficient.”

- 3.20 Both parties agree that at 1st April 2019, the Council considered the deliverable supply was 2,707 dwellings, of which 822 (30%) were houses that the Council considered would be released because of student accommodation. Both parties agree that this was a substantial portion of the supply at that time and was similar to that in the Croft Farm appeal discussed above.
- 3.21 Both parties agree that at that time were student accommodation excluded at 1st April 2019 but the remainder of the supply included, the Council would have been able to demonstrate a 5YHLS of 5.1 years.
- 3.22 Both parties agree that the appeal decision continues by stating at paragraph 51 that were the Inspector in that case to find that student accommodation should not be included and were to then discount the other disputed sites in the Council’s Housing Land Supply, then the provisions of paragraph 11d)ii of the Framework would apply.
- 3.23 The most recent appeal decision related to land at Baldwins Gate, dated 12th July 2023⁴. In this case, Inspector Philip Mileham found that student accommodation should not be included in the supply. Paragraphs 42-43 of the decision letter state:

“42. The Council has included an allowance of 349 dwellings from student accommodation in the Borough and has provided evidence that student numbers at nearby Keele University have been rising since 2013/14. The appellant has provided evidence which indicates that plans by the University expect further rises in student numbers in future. Although the PPG does not explicitly state that it is necessary to take into account the growth in student numbers in calculating the contribution from student accommodation, such information is capable of being a valid component of an assessment of the amount of accommodation remaining or to be released into the general housing market. In the context of a rising student population, any new student accommodation provided could be outpaced by future growth in student numbers.

43. The Council’s evidence shows growth in full-time students at Keele University has increased by around 1,400 students between 2013/14 and 2021/22. As such, the increasing number of students would take up the additional capacity created in student accommodation. Whilst this may limit further losses of residential accommodation in

⁴ PINS ref: 3314808 – core document **7.01**

Newcastle Under Lyme for student use, in this case there is insufficient evidence to conclude whether new purpose built student accommodation would result in any meaningful contribution to housing being released back into the general housing market.”

3.24 In that case, the Council considered that at 1st April 2022, the deliverable supply was 1,824 dwellings, of which 349 (19.1%) were houses that the Council considered would be released because of student accommodation. As above, the Inspector concluded that whilst this may limit further losses of residential accommodation in Newcastle Under Lyme for student use, there was no evidence before him to demonstrate that new purpose built student accommodation (PBSA) would result in housing currently occupied by students being released back into the general housing market.

3.25 The Inspector, after summarizing the parties’ cases on other areas of dispute regarding housing land supply, went on at paragraph 47 to state:

47. Taking all of these points in the round, whilst there is some evidence which points to the Council’s land supply shortfall being greater than their current stated position, there is insufficient evidence to conclude, even if it were necessary, on what the figure should be.

3.26 As stated above, the Inspector did not consider it was necessary to decide the correct figure for housing land supply.

3.27 The evidence before that Inspector in relation to student accommodation in that case has been added to the core documents as follows:

- The Council’s 5YHLS position statement at 1st April 2022 – please see paragraphs 5.10-5.18 of core document **8.02**;
- Council’s proof of evidence on housing land supply for the Baldwin’s Gate appeal – core document **8.03**;
- Appellant’s proof of evidence on housing land supply for the Baldwin’s Gate appeal – please see pages 8-28 of core document **8.04**;
- Council’s closing submission for the Baldwin’s Gate appeal – please see paragraphs 71-88 of core document **8.05**; and
- Appellant’s closing submissions for the Baldwin’s Gate appeal – please see paragraphs 14-23 of core document **8.06**.

Number of students

3.28 The two main universities which students living within Newcastle-under-Lyme attend are:

- The University of Keele; and

- The Stoke-on-Trent campus of Staffordshire University.

3.29 The following increase in student numbers at Keele and Staffordshire Universities from 2014/15 to 2022/23 are agreed. These figures are taken from those provided by the University of Keele and the Higher Education Statistics Agency (HESA)'s website:

Table 4: Student numbers at the University of Keele and Staffordshire University 2014/15 – 2022/23

	University of Keele			Staffordshire University		
Year	Part-time	Full-time	Total	Part-time	Full-time	Total
2014/15	1,914	7,791	9,705	7,565	10,710	17,735
2015/16	2,129	8,447	10,576	6,480	9,380	15,855
2016/17	2,086	8,931	11,017	5,955	8,955	14,910
2017/18	2,218	8,938	11,156	5,315	9,030	14,345
2018/19	2,313	8,978	11,291	5,730	9,120	14,855
2019/20	2,268	9,056	11,324	6,135	9,535	15,675
2020/21	2,558	9,504	12,062	7,210	10,635	17,845
2021/22	3,169	9,856	13,025	7,585	10,880	18,460
2022/23	3,164	10,443	13,607	8,220	13,225	21,445

Chart 1: Student numbers at the University of Keele 2014/15 – 2022/23

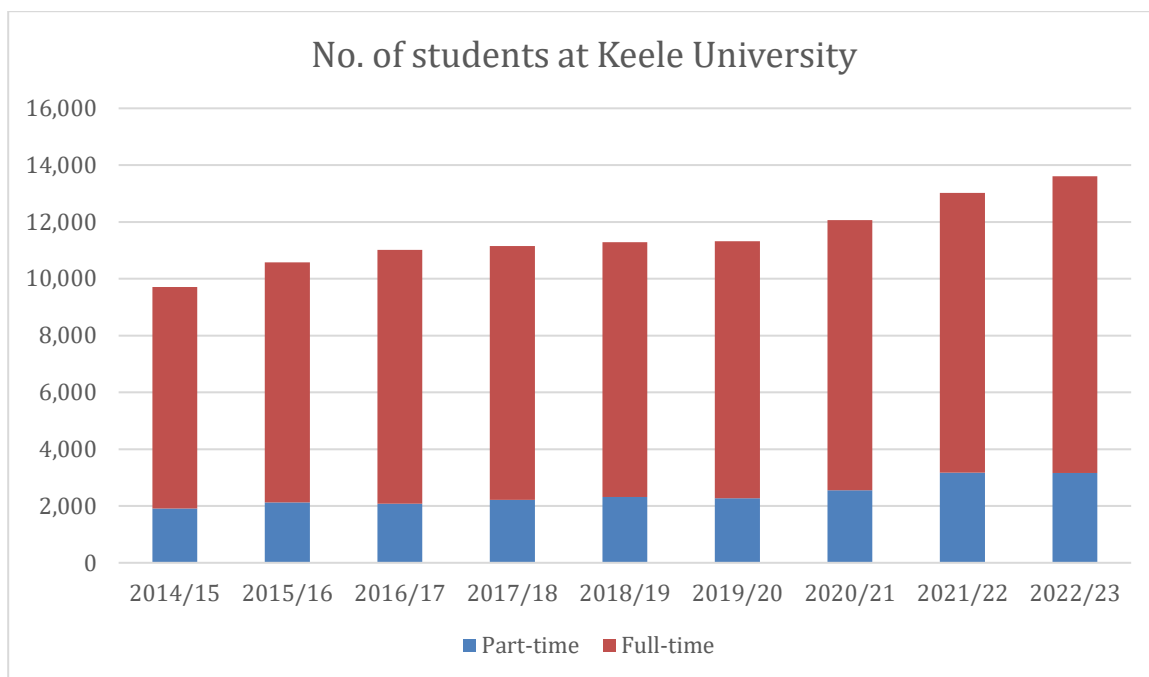
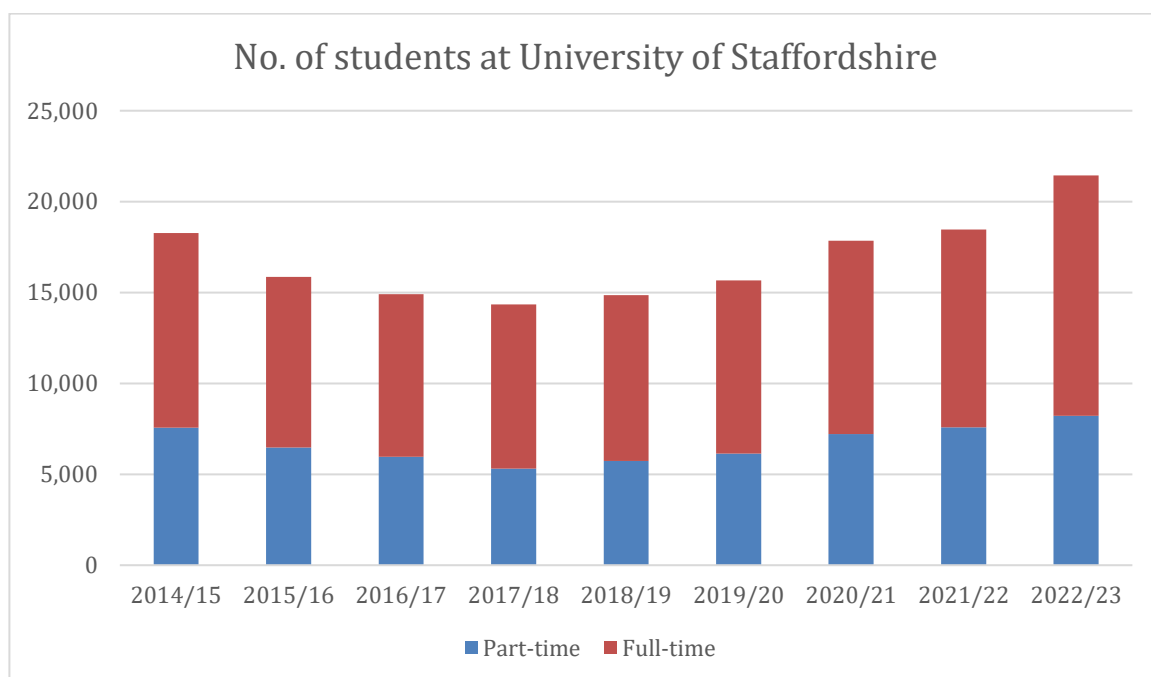


Chart 2: Student numbers at the University of Staffordshire 2014/15 – 2022/23



3.30 Both parties agree that the student numbers at Staffordshire University are not disaggregated between the campuses at Stafford and Stoke-on-Trent. This is relevant because the Stafford campus closed in 2016.

Paragraph 8.27 of the Council's Housing Needs Assessment (June 2020)⁵ explains that this is why student numbers decreased at that time. It is agreed that a proportion of students at Staffordshire University who are accommodated in Newcastle under Lyme. Evidence has not been presented as to what proportion that is, however. Notwithstanding this, the Council do not consider it to be relevant whether students accommodated in PBSA in its area are studying at Staffordshire University. Because their need for housing is being met in Newcastle, the provision of accommodation to meet their need counts towards supply, similar to any commuters who are housed within Newcastle, or any local authority area.

Properties exempt from Council Tax due to students in Newcastle-under-Lyme

3.31 The following table, which is taken from the Government's Council Taxbase data is agreed.

Table 5: Council Taxbase Data for Class M and N Properties in Newcastle-under-Lyme

Year	Class M Properties (Halls of residence)	Class N Properties (Dwellings wholly occupied by students)	Total
October 2010	118	352	470
October 2011	220	424	644
October 2012	220	455	675
October 2013	219	438	657
October 2014	219	440	659
October 2015	221	458	679
October 2016	222	552	774
October 2017	224	573	797
October 2018	200	578	778
October 2019	200	603	803
October 2020	200	713	913
October 2021	200	1,012	1,212
October 2022	200	1,417	1,617

⁵ Core document **8.07**

October 2023	198	1,450	1,648
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Future growth in students

- 3.32 Both parties agree that the University of Keele and Staffordshire University are proposing significant growth over the 5YHLS period.
- 3.33 Staffordshire University's Strategic Plan (April 2022)⁶ explains that it is seeking sustained growth in undergraduate student numbers, reflecting gains in regional, national and international numbers over the period 2022 to 2027. The key performance indicator is to grow its market share of full-time undergraduate on-campus students from 0.48% in 2022 to 0.7% in 2026-27. The Strategic Plan also states that there will be an increase in growth of full-time postgraduate on-campus students with increases reflected in domestic and international student numbers from 0.48% in 2022 to 0.7% in 2027
- 3.34 Keele University's Estate Strategy and Masterplan (updated October 2022)⁷ explains that the short to medium term growth is as follows:
- “The University plans to grow its home and international student base in undergraduate and postgraduate research. The student-based growth strategy, which already benefits from both recently approved, and developed projects, is complemented by the provision of new and improved administrative, employment incubator and student support facilities. This includes the recently constructed Denise Coates Foundation Building and Vet School on the Science and Innovation Park and the enhancement of the student accommodation offer on campus, with plans to grow to between 3,500 and 4,000 study bedrooms.”
- 3.35 The longer-term growth is to increase to 16,000 students by 2030 and 19,000 students by 2040.
- 3.36 These documents should be seen in their widest context and to some extent as promotional in nature to aid each of the respective institutions in the pursuit of funding & longer-term financial sustainability.

⁶ Core document **8.08**

⁷ Core document **8.09**

Student accommodation – Council’s case

- 3.37 Before Inspector Hockenfull (at the Inquiry into the currently undetermined appeal regarding land north of Mucklestone Wood Lane, Loggerheads which took place in December 2024 – PINS ref: 3350245) the Council attempted to calculate the number of homes within Newcastle that in recent years were occupied by students, deriving that evidence from council tax data. It produces a table and accompanying spreadsheet, and spoke to this in a HLS roundtable. The veracity of its evidence was challenged by the Appellant before that Inspector. It is not re-produced here, and the Council do not rely upon it in this inquiry, because the Council are not participating actively in the inquiry, and also because the Council’s case before that Inspector was that such evidence is not necessary; and PBSA should be counted towards supply as a matter of principle.
- 3.38 In order to be justified in counting PBSA in their supply, the Appellant requires that every local authority provide a “a list of properties that have been released in the general housing market because of these student completions or properties that would otherwise have been converted to student accommodation”. None of the Inspector decision letters it refers to mention the need for such a “list”. It is not feasible for any authority to provide one. A list of properties that have been “released” is theoretically possible given the council tax data authorities collect but would entail a very time consuming exercise, that the Appellant would expect to be undertaken annually. A list of properties that would “otherwise have been converted” is simply meaningless – you cannot produce a list to prove a negative. The Council would produce a list of every HMO or traditional home in the borough, and say these or a proportion of them have been saved from conversion to PBSA. That is an entirely pointless exercise.
- 3.39 The Appellant accepts it is correct to make an assumption that when students come into area they will move into PBSA, instead of general market housing. If that assumption is true, it applies irrespective of whether the PBSA proposed in future is sufficient in total to cater for the totality of all students coming to the borough. The PPG is not in absolutes. It does not say that PBSA may only be counted if in previous years PBSA has meant no more market housing has been lost. The PPG states you count PBSA “based upon ... the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation”. The word ‘extent’ means the test is in relative, not absolute terms.
- 3.40 The part of the guidance with the ‘second limb’ was introduced in 2018, after the Pinhoe Exeter decision. Notably, the inspector decision letters cited by the Appellant (other than Baldwin’s Gate) refer to Pinhoe and only explicitly refer to the “release” of general market housing as the test, making no reference to allowing general market housing to remain in such use. It is evident that the guidance was changed by the Government to clarify that PBSA in principle counts towards supply, without there needing to be evidence that it is releasing general market housing, in direct response to the Pinhoe decision.

- 3.41 Inspector Mileham in Baldwin's Gate does refer to both limbs in the guidance. Nevertheless, his conclusions were tentative and not critical to his overall decision. At para 42, he referred to evidence of a rising student population as merely "capable of being a valid component of an assessment of accommodation remaining or to be released" (i.e. it is not necessarily always relevant); and at para 47 he found it was not necessary to decide the HLS figure, and merely stated there was "some evidence which points to the Council's land supply shortfall being greater than their current stated position", without accepting the Appellant's findings.
- 3.42 There is no guidance that specifically places any onus on the Council to evidence the likely effect on the housing market of the PBSA it seeks to include in its supply. The difference with the guidance on the 'deliverable' test, that places an evidential onus on the council, is stark. The fact in principle PBSA counts towards supply is consistent with the fact that the PPG on housing need suggests that students are part of the population and their needs should be met through housing. In this borough, students are a significant part of the need for new housing; it is fair for PBSA to be counted towards the supply to meet housing needs.

Student accommodation – Appellant's case

- 3.43 PBSA should not be included in the 5YHLS for the following reasons.
- 3.44 Firstly, despite recent completions in PBSA in Newcastle-under-Lyme, the Council has not provided any evidence to demonstrate that the delivery of these three schemes resulted in either the release of existing homes occupied by students into general residential use and / or allowed other general market homes to remain in such use rather than being converted for use by student accommodation. For example, the Council has not provided a list of properties that have been released in the general housing market because of these student completions or properties that would otherwise have been converted to student accommodation. This is not surprising because there has been a significant increase in students at the University of Keele over the same period as these completions have been recorded. The new PBSA delivered has simply met a growing student population.
- 3.45 Secondly the Baldwin's Gate Farm Inspector concluded that there was insufficient evidence before him to conclude that new PBSA would result in any meaningful contribution to housing being released back into the general housing market. The evidence before that Inspector has been provided in the core documents and the Inspector for this appeal is respectfully invited to compare that evidence with the evidence the Council has put forward in its 5YHLS position statement to again claim that PBSA would release 479 dwellings in the open market.
- 3.46 Thirdly, chapter 68 of the PPG states that all student accommodation "can" in principle count towards the supply. However, analysis is required to calculate how many homes will be returned to general (non-

student) use and / or how existing open market homes would remain in such uses rather than being occupied by students. Therefore, student accommodation should not automatically be included. If that were the case, then there would be no reason for the first part of paragraph 68-034 of the PPG including the two bullet points. Paragraph 78 of the Framework requires LPAs to identify specific sites that are included within the 5YHLS and therefore the onus is on the LPA to demonstrate how this part of paragraph 68-034 of the PPG has been met, before then following the guidance in the remaining part of paragraph 68-034.

- 3.47 In the absence of the requisite analysis, student accommodation should not be included in the 5YHLS.
- 3.48 This point was confirmed by two Inspectors who considered Sheffield's housing land supply at two separate public inquiries which took place in April and June 2021 as discussed below.
- 3.49 The first public inquiry related to an appeal made by Patrick Properties Strategic Land Ltd against the decision of Sheffield City Council to refuse to grant permission for a mixed use development including up to 300 dwellings at the former Loxley Works, Storrs Bridge Lane, Sheffield⁸. The inquiry opened on 13th April 2021 and the appeal decision was issued on 10th August 2021. Paragraph 20 of the appeal decision explained that Sheffield City Council sought to include 2,763 units of student accommodation in its five year housing land supply but had not carried out an analysis to determine the amount of accommodation that new student housing releases in the wider housing market and / or the extent to which it allows general market housing to remain in such use rather than being converted for use as student accommodation. Paragraph 22 of the appeal decision again explained that the inclusion of student accommodation "requires evidence to justify its inclusion".
- 3.50 The second public inquiry related to an appeal made by Hallam Land Management against the decision of Sheffield City Council to refuse to grant outline planning permission for up to 85 dwellings at land at the junction of Carr Road and Hollin Busk Lane, Sheffield⁹. The inquiry was held at the end of June 2021 and the decision was issued on 10th August 2021. Paragraphs 38-42 of the appeal decision discuss the inclusion of student accommodation in housing land supply calculations as follows:

"38. A further area of disagreement between the main parties relates to the justification for the inclusion of student accommodation in the calculation of 5 year housing land supply. The PPG (Paragraph 68-034) advises that student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply. This is based on the amount of accommodation that new student housing releases in the wider housing market (by

⁸ Core document **7.08**

⁹ Core document **7.09**

allowing existing properties to return to general residential use); and/or the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

39. The PPG further advises that this will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students. Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis.

40. Evidence suggests that 2,763 student units are included in the 5 year supply that are purpose built student accommodation, including cluster flats. In order to meet the requirements of the PPG, analysis is required to calculate how many homes will be returned to general (non-student) use and/or would remain in such uses as they wouldn't be needed by students.

41. The PPG is clear that, save for the exception of studio flats, the ratio is not one for one. In order to undertake the analysis consideration is also needed of the likely growth in student numbers to compare against supply. In this regard, if the growth is the same as new student accommodation provided then it will be unlikely that there will be any release of existing housing stock from student use to general market use.

42. No convincing evidence of any analysis undertaken by the Council, including student growth, was provided to demonstrate how much market housing is released and how much realistically should be added to the supply. Without demonstration on the part of the Council that the 2,763 were adding to overall housing supply, and not simply meeting the needs of a growing student population, then they should be discounted. The effect of this view is to further reduce the number of years' worth of supply which the appellant calculates, in addition to the application of the Cities and Urban Areas Uplift, would provide a supply of 3.25 years. Even if I were to be persuaded that the urban uplift should not be applied, removing the student accommodation would take the supply to below 5 years." (emphasis added)

3.51 The two appeal decisions refer to Sheffield Council's inclusion of 2,763 units of student accommodation in its five year housing land supply (Loxley Works at paragraph 20 and Carr Road at paragraph 42). The Appellant has reviewed the evidence put forward in those two appeals in Sheffield and confirm that Sheffield Council did not add the full amount of student accommodation to its supply. It included studio units as 1 dwelling and applied a ratio to its student accommodation in clusters (similar to the position in Newcastle-under-Lyme).

3.52 Both Inspectors in these cases found that Sheffield City Council had failed to provide evidence that new PBSA would lead to 2,763 dwellings in Sheffield either being released into the general open market or

would allow homes in the general open market to remain in such use. This was because current and / or projected student housing needs exceeded the new student provision.

- 3.53 A similar position was found to exist in the Darnhall case in Cheshire West and Chester¹⁰, where the Inspector and the Secretary of State agreed with the Appellant's evidence that that Council should not include student completions in its housing land supply calculations because new purpose-built student accommodation would effectively be occupied by an increasing student population in Chester. Paragraphs 346 to 350 of the Inspector's Report state:

"346. CW&CLP P1 assessed the anticipated student population expected to be residing in the District when the FOAHN was established. The accommodation needs of students was included within the overall housing target with the exception of those living in halls of residence (CD13.10). If the number of resident students overall, including those living in halls of residence, has remained approximately the same since 2011, then this is a reasonable approach to take [IR 238].

347. However, this does not appear to have happened. Whilst overall student numbers seem to have changed little (+75), the number of full-time students at the University of Chester appears to have grown (by about 25%), whilst there has been a similar numerical decline in part-time student numbers. It is a well-recognised fact, supported by research on behalf of the University of Chester in this instance, that part-time students are more likely to be from the local area and to live at home than are full-time students, many of which will have moved from other parts of the country and require accommodation. If this has happened on a significant scale (the Appellant suggests an increase of 2,265 full-time students since 2010), then account of it should be taken in the calculations [IR 69, 108-109 & 238-40].

348. To count purpose built self-contained student accommodation, as a part of the supply, when such accommodation is likely to be meeting the needs of a growing number of full-time students, rather than the more constant numbers that were planned for, is not appropriate. In these circumstances, the dedicated student schemes [SR 144], whilst increasing the overall housing stock with self-contained units, would be unlikely to release accommodation into the wider housing market, such as freeing up some of that currently occupied by students in the Garden Quarter of Chester. Most of the units would be soaked up by some of the increasing numbers of students. Other students may also need to occupy open market homes such as HMOs [IR 107-111 & 243].

349. The Council refers to the multiplicity of University sites, some of which are outside of the district and to the opening of a new campus at Shrewsbury but there is no comprehensive assessment of the changes in student numbers and their locations since 2010. Given the attention paid to this at the previous Inquiries into this appeal and also at the Inquiries into the Nether Peover and Tattenhall Appeals and the findings

¹⁰ Core document 7.10

of previous Inspectors against the Council, in this regard, I find this surprising. In the circumstances I agree with the Appellant that all of the 430 student units in the Council's supply should be removed [IR 107-112,238, 241 & 242].

350. 630 student units are included in the pre-2018 completion figures and have contributed to the surplus. Without a demonstration on the part of the Council that these were adding to overall housing supply, as envisaged in the LP and not simply meeting the needs of a growing student population, then they should also be discounted [IR 60-61 & 244]."

- 3.54 Growth in student numbers is therefore an important consideration in terms of assessing whether PBSA could be included in the 5YHLS. If student numbers are to remain stable then PBSA could lead to a reduction in reliance on homes in the general market. However, the above cases have found that where there is going to be an increase in students this would not be the case and therefore it should not be included in the 5YHLS. The Baldwins Gate Farm Inspector also found that growth in student numbers is a valid component of an assessment of the amount of accommodation remaining or to be released into the general market and stated at paragraph 42:

"In the context of a rising student population, any new student accommodation provided could be outpaced by future growth in student numbers".

- 3.55 Fourthly, it is agreed that there has been recent increases in the number of students at Keele and Staffordshire Universities (please see table 2.3 and charts 2.1 and 2.2 of the SoCG on 5YHLS).
- 3.56 The number of students at Keele University has significantly increased by 3,902 from 9,705 in 2014/15 to 13,607 in 2022/23 and the number of students at Staffordshire University has significantly increased by 3,710 from 17,735 in 2014/15 to 21,445 in 2022/23. Within this context, it is not surprising that the number of properties in Newcastle-under-Lyme which are exempt from Council Tax relief has significantly increased over the same period as shown in table 2.4 of the SoCG on 5YHLS.
- 3.57 It is also agreed that both universities are proposing significant growth in student numbers over the 5YHLS period.
- 3.58 The University of Keele's Strategic Plan assumes 13,600 full-time students by 2026/27¹¹. This is an increase of over 3,000 full-time students from 2022/23. In the context of this rising student population, the 1,113 bedrooms that are to be provided by the 3 PBSA sites the Council includes in its 5YHLS would be significantly outpaced by future growth in student numbers. Indeed, based on the anticipated student growth, more open market homes will be required for students.

¹¹ Core document 8.09

PBSA sites in the 5YHLS

Sites of Horwood, Lindsay and Barnes Halls, Keele University

- 3.59 This site is at the University of Keele campus. The site has planning permission for the demolition of 732 student bedspaces and the erection of 20 new buildings to provide 1,706 new bedspaces (1,685 bedrooms in total). The Council's previous 5YHLS position at 1st April 2022 stated that the site would deliver 406 units in the five year period, as follows:

2022/23	2023/24	2024/25	2025/26	2026/27	5YS
35	100	135	136	0	406

- 3.60 However, the Council's current position at 1st April 2023 is that the site will only deliver 168 dwellings in the five year period, as follows:

2023/24	2024/25	2025/26	2026/27	2027/28	5YS
0	0	0	0	168	168

- 3.61 The University of Keele's website explains that it offers over 2,700 bedrooms on site, which comprises:
- Barnes Hall – This is located to the north of the Campus and has over 900 bedrooms in cluster flats with between 4 and 15 students per kitchen. Some of the units have private bathrooms and others share a bathroom.
 - Lindsay Hall – This has 456 bedrooms in cluster flats with between 4 and 25 students sharing a kitchen. Some of the units have a private bathrooms and others share a bathroom.
 - Horwood Hall – This has 589 bedrooms in cluster flats with between 6 and 22 students sharing a kitchen and between 6 and 14 students sharing a bathroom.
 - Holly Cross and The Oaks – Holly Cross has 240 bedrooms with private bathrooms and 4 students sharing a kitchen and The Oaks has 181 bedrooms with private bedrooms and 4 students sharing a kitchen.

- 3.62 The University of Keele has confirmed that it has 2,855 bedrooms on campus. This is shown in the following table:

Year	Standard	En-suite	Total
2009/10	2,451	746	3,197
2010/11	2,370	746	3,116
2011/12	2,498	746	3,244
2012/13	2,498	746	3,244
2013/14	2,447	746	3,193
2014/15	2,289	746	3,035
2015/16	2,289	746	3,035
2016/17	2,109	746	2,855
2017/18	2,109	746	2,855
2018/19	1,656	1,199	2,855
2019/20	1,656	1,199	2,855
2020/21	1,656	1,199	2,855
2021/22	1,656	1,199	2,855
2022/23	1,656	1,199	2,855

3.63 The Council provided evidence in relation to this site for the Baldwins Gate inquiry , which states:

“Land owner response: The Planning was secured in 2019, but due to the pandemic, Keele was unable to conclude the development and funding structure, but did progress with some enabling works which were completed in July last year. We are now in the process of re-starting the process again, which will involve re-tendering the construction and securing funding. The Plan is to progress the scheme (1,685 Rooms) in Phases, with Phase 1 (c 548 Rooms) to being open in summer 2026, ready for the 2026/27 Academic Year. We are yet to determine timetable for phases 2 and 3, but are minded to get Phase 1 underway and then assess how inflation and markets are looking.

The plan is to retain the 732 units during construction and to only consider demolition post PC of Phase 1

LPA Position: The 548 units that would be delivered within the monitoring period should contribute towards supply, without any discount for the 732 units which are not scheduled to be demolished until after the monitoring period.”

- 3.64 The first point the Appellant makes is that the delivery of this scheme is subject to securing funding and the details of this have not been provided. The second point is that if funding is secured and phase 1 is delivered by summer 2026, the demolition of the existing 732 units could still take place within the 5YHLS period from summer to 31st March 2028 as the University has only confirmed that the plan is to retain the 732 units during the construction of phase 1. Therefore, this could mean there is a net loss of student units within the 5YHLS period.
- 3.65 The third point the Appellant makes is that it is clear from section 2.2 of the University’s Estate and Strategy Masterplan that the student-based growth strategy to increase its home and international student base also includes increasing the student accommodation offer on campus with plans to grow to between 3,500 and 4,000 study bedrooms in the short to medium term. Indeed, the Planning, Design and Access Statement for this application states on page 16:

“To support its continuing success the University needs to invest in new student accommodation. This requirement is driven by:

- 1) The growth and planned future growth in student numbers.
- 2) Keele University currently has less rooms than in previous years due to the closure of Hawthorns Hall.
- 3) Some existing blocks need replacing as they don’t offer the accommodation our students seek.
- 4) The need to demolish a number of old “mothballed” blocks”

- 3.66 This is relevant because the new accommodation proposed at phase 1 is part of the plan to increase students, particularly international students who may not necessarily come to the university if accommodation on campus is not offered.

Former Jubilee Baths, Nelson Place

- 3.67 This site is located almost equidistant between Keele and Staffordshire universities. The site has planning permission for the demolition of the former swimming baths and the construction of a 273-room student development, which was granted on 24th July 2017, i.e., over 7 years ago.
- 3.68 Given the significant increase in number of students expected at both Keele and Staffordshire universities, and the fact that some of these units may be occupied by Staffordshire University students currently living or would otherwise live in Stoke-on-Trent, the Council has not provided any evidence to demonstrate that

this site will release homes in the general market in Newcastle-under-Lyme. In the absence of this evidence, the site should not be included in the 5YHLS.

One London Road

- 3.69 This site is under construction. As above, the Council has included completions at this site in its completion figures. The Council's previous 5YHLS position at 1st April 2022 stated that at the base date, 99 studio units remain to be delivered. However, the Council's current position at 1st April 2023 is that 103 units remain to be delivered. The Council effectively claims that these studio units will release 103 houses currently occupied by students in Newcastle-under-Lyme into the general market and / or prevent 103 homes currently occupied in the general market from becoming student accommodation.
- 3.70 A variation of condition application has been approved which allows occupation of the site by students or non-students until 31st August 2023 after which date it shall only be occupied by students (unless otherwise agreed in writing by the LPA (LPA ref: 21/01070/FUL, approved 15th February 2022). This was to allow occupation by students and hospital staff. More recently, an application was made in February 2023 to allow occupation by students and hospital staff permanently (LPA ref: 23/00104/FUL). This was approved on 27 June 2023 and allows for the occupation of up to 200 rooms by hospital workers, with the remaining 299 rooms to be used for student accommodation.
- 3.71 The property is marketed to both students of the University of Keele and those at Staffordshire University. The Sales Executive for the property has confirmed that there is a "good mix" of students from each university. This is relevant because the delivery of the 103 additional units may release homes currently occupied by Staffordshire University students living in Stoke-on-Trent and / or prevent other homes from becoming student accommodation in Stoke-on-Trent rather than in Newcastle-under-Lyme.
- 3.72 Given the significant increase in number of students and the fact that some of these units may be occupied by Staffordshire University students currently living in Stoke-on-Trent, the Council has not provided any evidence to demonstrate that this site will release homes in the general market in Newcastle-under-Lyme. In the absence of this evidence, the site should not be included in the 5YHLS.

The Appellant's conclusions regarding student accommodation

- 3.73 In conclusion, paragraph 68-034 of the PPG states that student accommodation "can" in principle count towards the 5YHLS, this is based on:
- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or

- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

- 3.74 Appeal decisions in Sheffield have concluded that this means student accommodation should not be automatically included, and some analysis is required to demonstrate how these bullet points have been addressed. Newcastle-under-Lyme has not provided this analysis. Like Sheffield, it has simply included the student accommodation sites based on either a ratio for cluster units or a 1:1 basis for studio units.
- 3.75 One relevant consideration in this analysis is to consider student population growth. When there is to be a significant growth in the student population, new purpose-built student accommodation should not be included in the supply because it would not have an impact on the wider housing market. This was found to be the case in the Sheffield and Chester (Darnhall) cases described above, the Exeter case referred to in the SoCG on 5YHLS and is the case in Newcastle-under-Lyme as confirmed in the Baldwin's Gate Farm decision.
- 3.76 Within this context, the three student sites included in the Council's 5YHLS would not release any homes currently occupied by students. It would simply accommodate an increasing student population.
- 3.77 In terms of the second bullet point of paragraph 68-034; if general market housing were to remain as such this would not increase the housing supply. This bullet point would only be relevant if, when market housing is converted to student accommodation, it is removed from the housing supply. This has not been the case in Newcastle-under-Lyme as the completion data does not include those homes "lost" to student use over the past few years despite a significant increase in students at the University of Keele. Indeed, the estimated growth in students over the 5YHLS period indicates that many more homes in the general market will be required by students.
- 3.78 In terms of the individual sites, there may be a net loss of bedrooms on campus if the demolitions take place in the 5YHLS period and the provision of the new accommodation is a key component in the student-led growth strategy. The One London Road and Jubilee Baths sites may be occupied by students of Staffordshire, and the Council has not demonstrated that this would release homes in Newcastle-under-Lyme rather than Stoke-on Trent.
- 3.79 In conclusion, the Council has not provided any analysis, including of student growth, to demonstrate how much market housing would be released and how much realistically should be added to the supply as a result of these 3 student sites. Without a demonstration on the part of the Council that 479 dwellings would be added to the overall housing supply, and not simply meet the needs of a growing student population, they should be discounted.