

CHESTER ARCHAEOLOGICAL SOCIETY

COMMENTS ON PROPOSED STUDENT VILLAGE (APPLICATION 13/02255/OUT)

SUMMARY

The Society calls upon CWaC to confirm its earlier rejection of this application, in particular for the following reasons:

- *The proposed development site is protected by Green Belt policies; ‘very special circumstances’ have to be demonstrated in order to support any intrusion into the Green Belt (NPPF and Policy ENV63 in the adopted Chester District Local Plan). No circumstances have been presented to justify such a major intrusion into Chester’s Green Belt.*
- *The proposed development would damage the historic setting of the city of Chester, destroying important views of the spires and towers of the city rising up above the surrounding landscape ;there is also the potential to damage views looking out from the city.*
- *The proposed development would have a negative impact on the important green corridor surrounding the canal at this location where the canal curves into open countryside, clearly leaving the urban envelope of the city.*
- *No need has been demonstrated for such a large student village on a single site outside the current urban area.*

Given the planning officer’s comprehensive and detailed review of this scheme and his well argued case for rejection when the application was last heard, the fact that the promoters have thought it worthwhile re-applying is a cause for concern. Recently a growing number of schemes have come forward for far more sustainable student accommodation in the city centre. The issues of student accommodation and the Redgrave Institute should be disaggregated and the latter considered separately on its own merits. The long-term expansion of Chester University has serious implications for the city which should be dealt with in the emerging Local Plan and be the subject of public consultation.

DETAIL

1.0 Process

The Society fears that there may be a lack of transparency in this application and its handling.

- 1.1 First, the development would intrude into a particularly sensitive section of the Green Belt, and thus needs to demonstrate significant countervailing benefits. However, despite the mass of supporting documentation, the matter for which immediate approval is requested seems to be merely access to the site from Parkgate Road, all other matters (appearance, landscaping, layout and scale) being reserved. The reason for this does not seem to be explained: if the developers really believe that their scheme will deliver significant benefits and is viable, why do they not submit a detailed application? One naturally fears that the intention is merely to get ‘a foot in the door’, leaving the developers free (perhaps after a Green Belt review as part of the new Local Plan?) to seek permission for whatever sort of development seems most profitable at the time. (For an account of the history of this scheme by the Friends of the North Chester Green Belt, see <http://www.northchestergreenbelt.com/greenbelt-at-risk/1-chester-student-village/>, although we cannot vouch for its accuracy).

- 1.2 Secondly, the scheme has been resubmitted unaltered after being rejected by Strategic Planning Committee. (One cannot imagine, if the scheme had been approved, that objectors would have been given a second chance). Objectors are naturally exasperated and inevitably begin to doubt the transparency of the process.

2.0 Policy and practice

There has been, and continues to be, a lack of adequate policy regarding student housing in Chester, and such policies as have existed have not been rigorously implemented, leading to acute problems in inner city areas. As a result CWaC is now faced with a number of student housing schemes – both the one currently under consideration and others in the city centre – and has no publicly agreed framework by which to judge them.

- 2.1 National Planning Policy Framework (NPPF) paragraph 17 states:
- ‘... planning should: be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.
 - not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives’.
- 2.2 Student accommodation is referred to in the existing Chester District Local Plan, paragraphs 7.27 and 7.49–.51 and policies HO3 and HO17. Policy HO3 makes provision for affordable housing on the following sites for various demographic groups, including students: Commonhall Street; surplus land on the Countess of Chester Health Park; Hunter Street/Northgate; Saighton Camp; Linenhall Stables; Heath Lane, Boughton; North East Urban Action Area. Policy HO17 regulates the creation of Houses in Multiple Occupation (HMO)s to provide student accommodation. *Inter alia* it states:
- ‘Proposals for the conversion of a dwelling to student accommodation will be granted provided that the following criteria are met:
- it does not result in the net loss of existing family dwellings;
 - the college/university which the student(s) attends can demonstrate a need for such accommodation which it cannot meet by more acceptable means, particularly purpose-built accommodation;
 - any proposal will not detract from the amenities of the area’.
- 2.3 In the Preferred Policy Directions of the emerging Local Plan (July 2012), PD 14 states: ‘The Council will seek to provide a mix of housing types and ensure sustainable and balanced communities through ... the provision of specialised student accommodation in appropriate, accessible locations, convenient for the facilities at the University of Chester’.
- 2.4 In 2012 Cheshire West and Chester Council commissioned the useful Nevin Leather report *Student Housing in Chester*. In July of that year it also passed a resolution to ‘undertake to work with all interested parties, who so wish to participate, to facilitate the development of a student village or campus to accommodate sufficient numbers of students ... to free the City of the harmful “pepper-pot” development of student accommodation.’
- 2.5 In the Archaeological Society’s objection to the previous application (http://www.chesterarchaeolsoc.org.uk/CAS_PlanConsult12_StudentVillage_PC_comments_V01_10-09-12.pdf) we stated: ‘We call on CWaC to work vigorously with the University and

other parties to establish clear, agreed and achievable long-term plans for student accommodation ... in Chester'. This echoes the Nevin Leather report, page 39: 'We would recommend that the University and the Council should work together to identify suitable sites for new student housing provision to assist potential developers. This would also ease the concerns of residents in other areas about the loss of family housing'.

- 2.6 Despite the caveat in Chester District Plan HO17, until recently accommodation needs resulting from increasing student numbers at Chester University seem to have been met by the creation of HMOs. This has led to high levels of concern among permanent residents, because of incidents of anti-social behaviour, litter, car-parking problems, the loss of family homes, properties standing vacant for several months a year, and the decline in the variety of local shops. These concerns are most acute in the Garden Lane area, where CWaC has recently imposed an Article 4 Direction regulating the future creation of HMOs, but they also exist in other inner city areas, eg Handbridge. Only recently has the University started to create new, purpose-built student accommodation (160 beds in the former Northgate Travelodge; 202 on the Parkgate Road campus). In addition to the student village under discussion here, there is now a plethora of other private schemes. The conversion of the former Careers Office, George Street, to 85 student flats has been allowed on appeal; there are currently applications to build student flats at Crewe Street, by the railway station (13/01876/FUL) (394 beds) and at 51–7 Upper Northgate Street (13/02586/FUL) (approximately 100 beds), while schemes for the provision of 530 beds at the former Linenhall Stables and approximately 200 beds on the site of the Stagecoach bus depot in Upper Northgate Street have been presented to the Conservation Area Advisory Panel. There are also a number of other, small new-build schemes, while the creation of more HMOs continues. The Crewe Street scheme is due for determination by 26 July and the Upper Northgate scheme by 23 September.
- 2.7 Thus, contrary to NPPF, the current situation seems to be characterised by the total absence of planning: the University seems to be 'ploughing its own furrow' and has repeatedly and strongly distanced itself from the proposed student village proposal (most recently on 31 May 2013: <http://www.chester.ac.uk/node/19613>), while CWaC appears to be merely responding to proposals from private developers and seems to be in danger of taking *ad hoc* decisions on schemes that will have a major impact on the shape and demography of the city, rather than taking the initiative and formulating a policy in consultation with residents and the University.

3.0 Student numbers

There is a lamentable shortage of comprehensive published information on the numbers of students and where they live. The information that has been published is incomplete and internally inconsistent.

- 3.1 It is frustrating that there is no single, comprehensive and up-to-date published source for the numbers of students on the University's Chester campuses and where they live (contrast the information available for Durham: <http://www.dur.ac.uk/spa/statistics/>). The following figures for full-time undergraduate students in 2010/11 are taken from the Nevin Leather report, pages 15–17. The numbers for those living within 2 miles of the University have been extrapolated from percentages based on a slightly different base number.

	No 2010/11	No <2 miles 2010/11
In university accommodation	1022	1022
In private halls	92	(incl above)
In private rented accommodation	2206	2175
In own home (mainly mature students)	486	152
Living with parents	1018	118
Other arrangements	85	N/A
Unknown	403	N/A
<i>Total</i>	5312	3467

Of those students living in their own homes or with parents, approximately 56% and 72% respectively lived between 5 and 30 miles from the University (ie within reasonable commuting distance), while almost 20% of the former lived within 1 mile of the University. As has been mentioned above, students living in private rented property are not evenly distributed around the city: 66% were recorded as living in the Garden Lane area.

- 3.2 However, the University's *Development Framework* (March 2012) pages 16–18 gives rather higher figures: 5963 full-time undergraduates in 2010/11 as opposed to 5312, and 6182 in 2011/12. Of the latter figure, 4138 lived in Chester (CH1–4 postcodes), 61% (ie 2524) in private rented accommodation. An estimated 2075 were studying from their own or their parents' homes; it is not stated whether they did so by choice or where they lived.
- 3.3 We deliberately avoid any attempt to take account of postgraduates here: we have even less information about them; they are likely to form a far less homogeneous group and to have different needs and lifestyles.

4.0 How much purpose-built student accommodation is needed?

Common practice is for British universities to try to offer managed accommodation to all first-year and foreign full-time undergraduates. The city-centre student housing schemes now proposed or under construction would allow Chester University to do this, as well as providing accommodation for most of the students who currently travel into the city, if they wished to make use of it. However, the requirement for dedicated student accommodation is ultimately determined by the limit of the capacity of the host community to provide private rented housing. This limit has already been exceeded in the Garden Lane area; CWaC needs to ensure the same does not happen elsewhere.

- 4.1 University students are free to live where they wish, but it is common practice for universities to try to offer accommodation that it owns to all first-year and foreign students. Again it is frustrating that there is no primary data for the latter, but the Jones Lang LaSalle *Chester Student Accommodation Demand Assessment* (June 2012), pages 10–11, puts the number at approximately 500. If we accept the total of 6182, to accommodate all first years and all foreign students at Chester would therefore require approximately 2200 places. Clearly at the moment there is therefore a considerable shortage of University accommodation; the 160 places at the former Travelodge and the 202 places under construction on the Parkgate Road campus will only go a small way to ameliorate this.
- 4.2 If all the units listed in para 2.6 above were to be built, they would add approximately 1671 student beds in managed accommodation, giving a total of 2785 if we include the existing provision. If we exclude the 486 (?mature) students studying from home, this represents a respectable 49% of the total requirement for student accommodation

(2785/(6182-486)). However, it still leaves 2900 students to be accommodated elsewhere. According to the University's own figures, over 2500 are currently living in private rented accommodation in Chester. Thus 400 students would still have to seek additional private lets in Chester or live further afield. Nevertheless, this would be a considerable reduction from the 1589 (2075-486) who, according to the University's figures, currently study at Chester but do not live there, and of that 400 some at least will genuinely not wish to seek accommodation in the city. Even so, if there were to be a significant increase in the number of students wishing to live in Chester in the future, then additional sites would have to be found for specialised accommodation or more HMOs would need to be created.

- 4.3 Although students may prefer, especially in their second and third years, to live in small groups in the community, there is a limit to the number of family houses in established residential areas that can be converted to meet their wishes without damaging the character of those areas. That limit has already been passed around Garden Lane, and we hope that the application of an Article 4 Direction will prevent further damage. However, this restriction could simply displace the creation of HMOs into other inner city areas, and, as suggested in the Nevin Leather report, page 39, we recommend that CWaC takes pre-emptive action in consultation with residents to limit future damage. At this point we ought to point out that we do not consider that the problem lies so much with students as with the creation of HMOs as such, which almost by definition are liable to attract transient populations and create car-parking problems etc. The ideal would obviously be, over time, the reversion of some existing HMOs to family housing, but it is difficult to see whether and how this might be done.
- 4.4 There are apparently conflicting opinions on likely future expansion. The Nevin Leather report, page 38, concludes: 'Overall it seems prudent to assume that there will not be a substantial further growth in student numbers in Chester on the scale of recent years. The most likely outcomes are a static position, or small levels of growth or decline, at least until the new system settles down. The University's aspirations and views on likely further outcomes will be important to take into account, and the University and the Council will need to work together closely to monitor future trends'. This view is echoed in the University's *Development Framework*, pages 18–19, and lies behind their current incremental approach to the provision of student housing.

By contrast, the Jones Lang LaSalle report, page 25, concludes: 'We are of the opinion that in spite of the challenges faced by the higher education sector as a result of increased levels of tuition fees that have been introduced as a result of the Browne Review, that the University of Chester is well placed to continue the growth of its student population, particularly in the medium to long term when the reforms of the higher education system have bedded in and as we suspect have little impact on the long term demand for higher education'.

The difference of opinion may be little more than one of timescale, with the Nevin Leather report and University's *Development Framework* emphasising short-term uncertainties and the Jones Lang LaSalle report possible renewed growth in the medium to long term.

5.0 Where should student accommodation be sited?

Ideally student accommodation should be sited within easy walking or cycling distance of the University campuses and of shops and leisure venues, but should not disrupt existing residential areas. This is true of the city-centre student housing schemes

currently before CWaC. The proposed student village is less sustainable because of the lack of local facilities; it would encourage car use (and thus possibly direct student spending to Cheshire Oaks rather than to Chester city centre); and given the alternatives it would be an unnecessary intrusion into an important part of the Green Belt.

- 5.1 Students have the advantage of being a clearly identifiable group with relatively limited requirements and a small number city-centre workplaces (ie the University campuses). They are thus well suited for high-density inner city accommodation, from which they can reach the University, shops, leisure venues etc without needing a car. However, their gregarious, sometimes noisy lifestyle can disrupt nearby established residential communities, even when they are in purpose-built accommodation.
- 5.2 Judged by these criteria, student accommodation in 'public' areas of the city, such as at the Northgate Travelodge, the two sites on Upper Northgate Street and the former Linenhall Stables, seems in principle a good idea. These sites lie outside the retail core of the city and there are no other obvious uses for them. Student housing would be within easy walking or cycling distance of the University's campuses and the city centre (meeting expressed student preferences), would bring these sites back into use in a way that would not generate traffic (except at the beginning and end of term - which is a matter that needs to be allowed for in detailed design), and could support the retail and leisure economy of the city (assuming the aspirations for a new theatre and cinema come to fruition). However, we consider that the scheme for the Linenhall Stables is over-intensive and would oppose it in its present form, although we have no objections to this use of the site as such (see the minutes of the Conservation Area Advisory Panel for 4 June). The Crewe Street scheme is well designed but there are concerns from local residents about potential noise which must be addressed. As other uses for this site one could theoretically envisage apartments (although there is already supposedly a surplus of these in Chester) or commercial offices, as an extension from the Central Business Quarter. We would advise against any further student housing, even in purpose-built accommodation, that impinges on the Garden Lane area, as it would tend to reinforce the already distorted demography of that locality.
- 5.3 In the present uncertain climate there is no need for a large scheme such as the student village, and certainly not one on one of the most sensitive sections of Chester's Green Belt. The proposed city-centre accommodation referred to above would have a tremendous impact on the current student housing situation, and we consider that the sites are sustainable ones that stand up on their own merits. Further city-centre sites may well emerge, removing for the foreseeable future any need for a single, huge out-of-town scheme like the student village with all the negative consequences listed below.
- 5.4 It is worth summarising the conclusions of the planning officer when the student village scheme was last considered (12/03447/OUT, 24 January 2013):
- The proposed development is speculative in nature ... The very special circumstances [for building in the Green Belt] that have been advanced are based upon an unsubstantiated and challengeable need for the development, a lack of opportunity elsewhere within the urban area to deliver such accommodation (without justifying why the development cannot be disaggregated), ... as well as unsubstantiated delivery of economic benefits for the adjacent suburb of Blacon. None of these are considered to be so very special as to convince the Authority that this development is either needed, or is the only option available to deliver student housing in numbers to meet likely demand in the future.

- The proposed development will not retain the visual amenity of the area and will encroach into the countryside. There is currently a clearly defined edge formed by the northern built-up part of Blacon that demarcates where the urban area ends and the rural area starts. This development will break that strong boundary between a key urban edge and the rural area. The development will be distinctive in its own right but it will not sit comfortably in the landscape or respond well to established development within Blacon.
- The proposal is considered to be harmful to strategic views towards the historic skyline of Chester City from the A540 Parkgate Road and to the historic landscape setting of the City.
- The proposed development will generate significant traffic movements into the City, in particular along the A540 Parkgate Road towards the Blacon roundabout.
- Overall, the proposed development is, therefore, considered to be unacceptable for the reasons set out in this report. It would not satisfy the tests set out in the Framework for 'sustainable development' and would cause serious harm to the Green Belt to the north of the City which has been recognised as a particularly sensitive location.

5.5 Given that the application is an outline one, with all matters except access being reserved, it may not be worth criticising it in detail. However, we would make the following points:

- Unless they were provided on site, there would be a shortage of shops for essential supplies within easy reach. It would be about 1 km to the Parade in Blacon, where the shops are in any case very limited, or about 1.5km to Morrisons – a trip most likely to be made by car.
- Although there is a frequent circular bus service around Blacon, the scheme largely 'turns its back' on the suburb and emphasises connectivity via Parkgate Road. We suspect that the village would encourage much greater car use among students, and once in their cars, students are as likely to spend their money at Cheshire Oaks as in Chester city centre.
- The Redgrave Institute would supposedly provide a state of the art gym; fully functional performance suite; sports injury clinic together with a number of lecture areas, research labs and consulting rooms; and. outdoor sporting opportunities It would supposedly run a series of community programmes allowing more people to become involved within sport and activity through the identification of gaps in sporting provision throughout Cheshire West and Chester. It would also offer accommodation for national and international teams and students who choose to train and study at the Redgrave Institute, out of term time. Crucially, it would seem that the main link between the institute and the student village is the sharing of residential accommodation, and we are not convinced that this would happen so frequently or on such a large scale as to make co-location essential. We would therefore argue that the matter of the Redgrave Institute be disaggregated from questions of student accommodation, and that the former should be considered separately on its own merits.
- Although it is a reserved matter, it is worth drawing attention to the Conservation Officer's view that 'Although the landscaping is intended to have park like quality, this will be subsumed by the scale, density and formality of the layout, which imposes an essentially alien urban form upon a site where opportunities for a sensitive lower density contextual scheme might not be wholly dismissed. There is little to commend this proposal'.
- We do not see why the economic benefits claimed for the student village should not equally apply, *pro rata*, to dispersed blocks of student accommodation.

6.0 Conclusion

- 6.1 Chester University is a successful organisation that benefits the city. However, it does also make demands on the city – especially spatial – that need to be mediated by CWaC. The siting of the University close to a critical part of the Green Belt means that long-term expansion plans will need to be very carefully considered. It is essential that this is done as part of the emerging Local Plan. However, the current application certainly does not justify an intrusion into the Green Belt and moreover will be detrimental to the green setting and panoramic views of the historic city of Chester. The Society therefore strongly urges its rejection.

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For Chester Archaeological Society
30 June 2013