



Planning Design and Access Statement

Stafford Court, New Beacon Campus, Stafford

SERCO

March 2022

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1. Introduction

- 1.1 This Planning Statement is submitted in support of a planning application for the change of use of New Beacon Campus, Weston Road, Stafford, from residential accommodation for students to residential accommodation for asylum seekers. Cushman and Wakefield (C&W) is instructed by Serco to prepare and submit the planning application.
- 1.2 This Planning Statement refers to and should be read in conjunction with the following submitted as the complete application:
- Transport Statement – Hub Transport Planning
 - Statement of Community Engagement – BECG
 - Plans – NPS Group:
 - Site Location Plan
 - Site Layout Plan
 - Stafford Court Existing Ground Floor
 - Stafford Court Existing First Floor
 - Stafford Court Existing Second Floor
 - Stafford Court Proposed Ground Floor
 - Stafford Court Proposed First Floor
 - Stafford Court Proposed Second Floor

Report Structure

- 1.3 This Planning Statement is structured as follows:
- Section 2, Site & Surroundings
 - Section 3, A description of the proposed development and its operation
 - Section 4, Planning History and Permitted Use
 - Section 5, Planning Policy Framework
 - Section 6, Planning Assessment
 - Section 7, Conclusion

2. Site & Surroundings

The Site

- 2.1 The application site comprises a broadly rectangular parcel of land within the Campus site, which extends to 1.54 hectares. Figure 1 shows the site location.

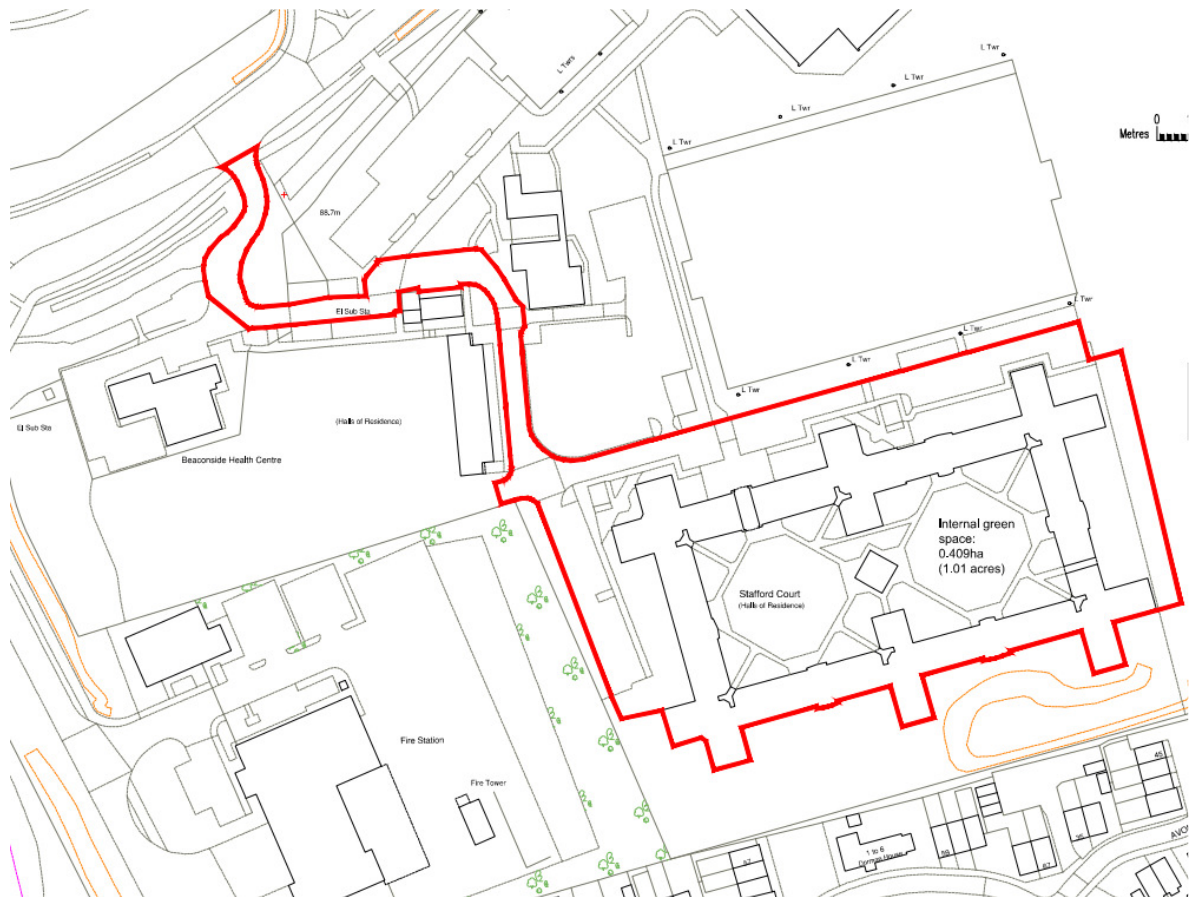


Figure 1 – Site Location Plan

- 2.2 Stafford Court is purpose-built student accommodation comprising twelve, connected, three storey blocks. Each block is comprised of cluster flats which contain either en-suite bedrooms or standard bedrooms, shared kitchens, shower rooms and w/c's
- 2.3 The site currently provides accommodation for up to 556 students. The current configuration of Stafford Court includes 556 single bedrooms (with 264 being en-suite), 96 shower rooms, including sink & w/c, 48 kitchens and a communal laundry.
- 2.4 The site access for vehicles is currently taken from the main campus access on the A518 Weston Road and the access will remain for the proposed use.
- 2.5 The property lies wholly within Flood Zone 1, where land is at low probability of flooding with a less than 1 in 1,000 annual probability of river or sea flooding.
- 2.6 There are no statutory environmental designations pertaining to the site.

Recent and Current Use of the Site

- 2.7 In 2014, Staffordshire University sold the site to the current owners and since that time approximately

seventy five percent of the accommodation has been vacant.

- 2.8 In 2019, the owners entered into a lease agreement with Staffordshire University to lease two blocks, Derrington and Eccleshall for occupation by medical students (approximately 70 students). The lease agreement expires in August 2022 and no negotiations have been initiated by either party to extend the term.
- 2.9 During early 2020, the owners undertook a trial of letting units within the Brocton block to young individuals in order to establish whether there was demand in the area for this type of accommodation. Only a few AST's have been executed on the ground floor leading the owners to conclude that there is insufficient demand to support this housing model. All of these AST's expire within Q1 of 2022.
- 2.10 The original intention of the owners for the entire New Beacons site, not just Stafford Court, was to create an educational facility, including accommodation, exclusively for overseas students. However, despite best endeavours, the owners only secured commitment from eight students leading them to conclude that there was insufficient demand for this business model of educational services in relation to both overseas and domestic students.
- 2.11 This caused the owners to re-think their business plan and over the last two years they have successfully developed a space rental business / enterprise park / business village / conference and events facility. With the exception of Stafford Court and a couple smaller buildings in proximity to Stafford Court (Yarlet Building and Aston Common Room), the entire site is now utilised, via various commercial agreements, for the benefit of a diverse array of end users.

Surrounding Area

- 2.12 Land to the north of the site comprises indoor and outdoor sports facilities. To the east of the site is open countryside. To the south of the site is a new housing development. To the west of the site is Stafford fire station.
- 2.13 Stafford town centre is approximately 3km to the west of the site.
- 2.14 Bus stops are located within a 3-minute walk from the site on Weston Road and Hydrant Way providing connections to the town centre and wider areas of Stafford. Stafford Train Station is approximately 3.5km from the site. A Transport Statement submitted with this application identifies the existing public transport infrastructure in more detail.

3. The Proposed Development

- 3.1 The proposed development comprises the change of use of the building to accommodate Asylum Seekers for a period up to 31st August 2029
- 3.2 Internal alterations to the building are proposed in order to accommodate the needs of the new residents. No external alterations to the building are proposed.
- 3.3 It is proposed to significantly reduce the capacity of the building from 556 to 481 bedspaces. This will comprise 171 bed spaces for Initial Accommodation (IA) and 310 bed spaces for Dispersed Accommodation (DA).
- 3.4 The internal alterations are shown in the following plans submitted with this application:
- Stafford Court Existing Ground Floor
 - Stafford Court Existing First Floor
 - Stafford Court Existing Second Floor
 - Stafford Court Proposed Ground Floor
 - Stafford Court Proposed First Floor
 - Stafford Court Proposed Second Floor
- 3.5 The existing car parking provision provides ample secure parking space for transport, staff and visitors and under the terms of any lease granted, Serco would have exclusive use of thirty car parking spaces adjacent to Stafford Court. Only Serco authorised vehicles will be using the site. Asylum seekers do not have cars and will travel by foot, cycle, public transport or private shuttle bus.
- 3.6 A shuttle service will be provided for residents to travel to and from nearby urban centres. The applicant is prepared to secure this by planning condition of planning obligation.
- 3.7 The IA facility provides the following for residents.
- 3 x medical rooms with store
 - 5 x private offices/meeting rooms
 - 24-hour reception area – for any queries or escalations
 - Outdoor recreational area

Initial Accommodation (IA)

- 3.8 IA is a block-based provision to accommodate asylum seekers who need accommodation urgently before their support applications have been fully assessed for longer term accommodation can be arranged. The length of time people stay in IA can vary, but around three to four weeks is normal, before moving into dispersed accommodation throughout the Midlands, and East of England. During their stay in the IA, the Home Office undertakes initial interviews and process their application.
- 3.9 When asylum seekers (referred to by Serco as 'Service Users') arrive in the UK and present as "seeking asylum", all claimants are routed through a central point in Croydon, provided by the Home Office. Serco transport the Service User to one of the IA blocks it manages.

Dispersed Accommodation (DA)

- 3.10 Dispersed Accommodation (DA) is longer-term temporary accommodation, Asylum seekers will

normally be able to stay in DA until their asylum claim has been fully determined.

- 3.11 Over recent years, hotels have often been utilised for DA provision, which is not an ideal solution, as the accommodation is not designed for the end use. Accordingly, Serco undertook an exercise to identify a facility which could permanently satisfy this requirement.
- 3.12 At the start of their stay in DA service users will receive the health assessment (ASF1) and will receive their Aspen card for financial support.
- 3.13 An Aspen Card is not a credit card and does not create a bank account. Only the Home Office can put funds onto an Aspen card. The Home Office will notify service users of the amount of financial support they are entitled to get and this will be made available on their card each week. Asylum Seekers can use their Aspen card to pay for retail transactions at most shops displaying the Visa logo, up to the value of the available balance.
- 3.14 If possible, Asylum Seekers remain in their allocated DA until their application is determined, which could be months or years.
- 3.15 IA and DA are to be provided on the site as follows;

- Single Adults (located in both IA and DA).

All of the IA and DA blocks are comprised of Clusters which are made up of bedrooms, bathrooms, kitchens and designated dining and communal areas. The existing layout of each Cluster has been modified so that all Clusters exceed the requirements of Stafford Borough Council Amenity Standards for Houses in Multiple Occupation (January 2020).

Each adult would be allocated their own bedroom. Some of the bedrooms are en-suite, where this is not the case then each adult will have access to a shared bathroom. All bathrooms include a shower, w/c and sink.

Each Cluster contains a communal kitchen which is equipped in consideration of the maximum occupancy of the Cluster and will also include a washing machine (the communal laundry within the central courtyard of Stafford Court will not be used). The kitchens in the majority of the Clusters are sufficiently large to also provide dining and lounge space for the occupants. Some Clusters have additional lounge rooms which are in excess of the Amenity Standards

- Families (located in IA only)

Each family is assigned an entire Cluster. Under no circumstances do any families share a Cluster. It is anticipated that families will not be accommodated in the dispersed accommodation (DA) block.

- Compartmentation: Asylum seeker Clusters are segregated by demographic, that is to say that either by block, or by floor, single males are not housed with single females and singles are not housed with families.

The Need for the Asylum Accommodation

- 3.16 The Home Office asks all Local Authorities to facilitate DA for asylum seekers. In order to make the process fair, the number of asylum seekers for whom each Local Authority must facilitate DA is

calculated as a ratio of 1:200 of the population of each Local Authority. At present Stafford Borough is not providing any DA whereas several authorities in the midlands are providing close to or exceeding the 1:200 ratio.

- 3.17 IA sites are larger and the required specification is more complex meaning that the availability of sites is extremely restricted. Accordingly, when a site is available, it is progressed without the need to consider the 1:200 ratio.
- 3.18 Based upon the recent population estimate of Stafford Borough 134,200¹ the provision of 481 places results in a provision of 1:278, which is below the cluster limit of 1:200.
- 3.19 During the period of the Covid-19 pandemic the need for the DA has significantly increased. This is due to the national lockdowns, during which periods asylum seekers continued to enter the UK's AASC² system but very few left the system. This has caused the property estates of all suppliers to the Home Office to become overloaded resulting in thousands of asylum seekers being accommodated on a temporary basis in hotels across the UK.
- 3.20 Currently, IA provision within the Midlands & East of England region is provided by two sites - Laverstoke Court, Derby (210 spaces) and Stone Road, Birmingham (270 spaces).
- 3.21 In response to the impact of the Covid-19 restrictions over the past two years, temporary facilities, such as hotels, have also been provided within Derby City Council Local Authority, which collectively house another 131 asylum seekers. Birmingham City Council Local Authority collectively houses another 732 asylum seekers. In relation to the Afghan relocations and assistance policy (ARAP), Derby is about to open a site to accommodate 366 Afghan refugees.
- 3.22 Unfortunately, the lease on Stone Road, Birmingham expired and, whilst a short temporary extension has been agreed until 31st March 2022, an alternative IA facility is urgently required, as well as additional accommodation to meet the growing requirement.
- 3.23 In January 2020, Serco initiated a project to find a suitable replacement. Eighty-three commercial property agents, national property service groups, developers and investors were contacted and provided with a brief of what was required, where and within what timeframes as defined by the AASC contract between Serco and the Home Office.
- 3.24 Eight sites were identified from the exercise. These are summarised below together with the reason why they were discounted from this process.
- Derby (1) – Office block. Northgate House, Friargate, Derby. Capacity not determined. Too expensive and delivery timescales too long.
 - Wolverhampton – Former Sunbeam Factory, Wolverhampton. 319 bed spaces. Too expensive and re-development time too long.
 - Coventry – Sherbourne Student Village, Vincent Street, Coventry. 214 bed spaces. Not commercially viable
 - Birmingham – Priory House, Gooch Street, Birmingham. Capacity not determined. Required significant re-development which would take too long and be too expensive.
 - Wolverhampton – Fiveways House, North Road, Wolverhampton. 296 bed spaces. Good potential for this purpose-built student facility however the landlord is exceeding his required

¹ Source: Stafford Locality Profile 2018

² Asylum Accommodation and Support Contracts

occupancy rates from the student sector and so negotiations have stalled.

- Leicester – Preston Lodge, Kingfisher Avenue, Leicester. 84 bed spaces. Too small for IA. However, a change of use planning application is pending approval upon which Serco plans to use the site as DA.
- Derby (2) – Abbey Lodge, Lonsdale Place, Derby. Student Accommodation comprising 366 bedspaces. A planning permission has been granted and Serco are looking utilize the facility to accommodate Afghan refugees.
- Stafford Court.

3.25 Serco has continued the search for similar sites, with limited success and no immediate alternative are available. An additional site in Peterborough was subsequently identified and has been procured by Serco and will deliver 112 DA rooms.

3.26 All of the locations above, Derby, Coventry, Birmingham, Wolverhampton and Leicester, accommodate a significant number of Asylum Seekers already and some additionally house service users under the Afghan scheme. Stafford Borough is the only Local Authority on the list that does not house any asylum seekers in consideration of the AASC scheme.

The Identification of Stafford Court

3.27 After a rigorous and extensive search, undertaken in 2020 and detailed in this statement, Serco identified Stafford Court as the most suitable site for its needs in relation to the AASC contract. It is proposed that part of the site be used for IA and that the balance of the site be used for DA.

3.28 The configuration of self-contained clusters at Stafford Court is ideal for accommodating asylum seekers during both the IA and DA phase of their application. The ability to secure each cluster, an individual floor or an entire block creates maximum flexibility to accommodate single males, single females or families with the appropriate level of segregation and security.

3.29 The proposed use is effectively a managed residential development and Stafford Court is considered an appropriate location for such a use. The site is similar to other IA operations elsewhere in the UK.

Site Management and Operation

3.30 The site will be managed by Serco on behalf of the Home Office. Serco is a renowned service and outsourcing company that has been delivering essential public services to governments around the world for more than 40 years. In 2012, Serco was awarded the COMPASS contract by the Home Office to provide accommodation and transport services for asylum seekers in the North West. In 2019, COMPASS became The Asylum Accommodation and Support Services Contracts (AASC); Serco were re-appointed to deliver services in the North West and were additionally awarded the contract for the Midlands and East of England.

3.31 The management structure for the IA is set out in the diagram below.



3.32 The management team are responsible for the delivery of the following objectives;

- Management and leadership of a team of housing officers and maintenance officers to ensure that all asylum seekers are supported with care, dignity and respect whilst in IA.
- Ensure all accommodation is maintained to standards required by the AASC contract, legislation and the relevant Local Authority, including working with relevant Senior Management Team(SMT) members to ensure best use of trade specialists, suppliers and sub-contractors.
- Ensure that there are efficient and effective cash handling processes in place to manage and reconcile monies issued to asylum seekers within IA, when required.
- Develop strong relationships with partner organisations (e.g. NHS, Migrant Help) to ensure asylum seekers are assisted in their first stage of support.
- Operational delivery of all health and safety standards to deliver a safe working environment for all users of the IA estate.
- Repairs and Maintenance 80-20 model which consist of 80% delivered internally, 20% delivered externally.

3.33 In managing the site Serco will engage with the local police authority; fire services; community and faith groups to establish a good working relationship between these key stakeholders, staff and service users. Serco's experience is that information sharing significantly benefits and helps in the event of an incident or emergency.

3.34 The property will be staffed 24 hours a day. Serco has a contract for 24-hour access to a telephone-based interpreter service.

3.35 In delivering support to asylum seekers, Serco are supported by Migrant Help, a charitable organisation, appointed by the Home Office under AASC, who operate a national service called Advice, Issue Reporting and Eligibility (AIRE). Migrant Help can provide asylum seekers with independent advice and guidance on the asylum process and also direct them to other services available in the UK.

3.36 Migrant Help supports asylum seekers to access financial support, accommodation, legal advice and other services which they are entitled to under UK law. They help asylum seekers to understand the asylum process, their support entitlements and how to access other essential services (including health care and legal services) before their asylum interview. Migrant Help's free helpline advises asylum seekers in their own language.

- 3.37 The number of occupants on site will vary as Serco will always match demand for accommodation to availability. The number of single people and families that arrive in the UK varies throughout the year, so Stafford Court will be used on the same basis as other IA and DA facilities. The number of occupants will not exceed the maximum set out in this application.
- 3.38 The occupants of the site will have no restrictions placed upon their day-to-day whereabouts. There are a number of appointments they will be required to attend with the Home Office. Serco advises Asylum seekers not to congregate in groups, as they are mindful that some members of the local community could perceive this as unsettling.
- 3.39 If any asylum seekers do not obtain prior notification before leaving the Block for more than 24 hours, Serco will report any absences to the Home Office for further action.
- 3.40 Asylum seekers are not allowed to work whilst their claim for asylum is being assessed. Nor do they have access to any benefits that would be afforded to a UK citizen. They do however receive a small daily payment.
- 3.41 Serco will facilitate on site activities for all the occupants, as well as ‘wrap around’ services on-site, along with additional transport provision in order that the site functions sustainably and does not adversely impact existing services in the local area. If a particular facility or service is not available within the local area and in the unlikely event that it also wasn’t available via the internet, then Serco would arrange for such provision to be brought to the site at an appropriate frequency.
- 3.42 Throughout the Covid-19 pandemic, Serco have worked closely with voluntary and statutory agencies to bring such support to those residing in the settings. This response involves a great deal of coordination and collaboration with such agencies and utilisation of available space to deliver on activities such as (not exhaustive):
- On site education provision for children missing education
 - Socially distanced marking of religious festivals
 - On site Health rooms for residents
 - Gardening
 - Women’s groups
 - Other adult educational programmes

Transportation for Occupants

- 3.43 Serco will provide transportation to and from required locations to ensure there is continued access for interviews with the Home Office; any Healthcare provider and support agencies contracted to the Home Office. Ad Hoc transportation, e.g. to attend places of worship, will be provided upon request.
- 3.44 Serco briefs all our asylum seekers on the basics of road safety as part of their site induction.

Health and Safety and Safeguarding

- 3.45 The health and wellbeing of occupants and the local community is of the utmost priority to Serco. Serco will closely engage with the police and fire authorities to ensure any concerns are addressed in an open and transparent forum. Through Serco’s close engagement with local police authorities, they

are advised that crime has not increased in areas where any of our properties are located.

- 3.46 Serco will accommodate a mix of single people and families in a number of blocks within the part of Stafford Court identified to be used for IA and a mix of singles only within the DA part of the site. Each floor has secure entry mechanisms so that only asylum seekers who are allocated a room on a particular floor can gain access. In addition, there will be 12 support staff on site, who are fully aware of the safeguarding requirements
- 3.47 Serco has a dedicated relationship team who are responsible for any safeguarding issues. The team also engage with local community groups; 3rd sector and faith groups, to facilitate mutual understanding through workshops, drop-in groups and activities. All of the above agencies, including police and fire, meet on a regular basis at the Multi Agency Forum (MAF), which Serco will also attend.
- 3.48 For health care access within IA, the asylum seekers are registered with a health care provider on site and local services will only be required in the event of a medical emergency. Serco is working with the Home Office to understand if this health provision can be extended to the DA community.
- 3.49 Serco has some of the most robust processes, systems and controls in place to manage any Covid-19 situation. Indeed, during the pandemic Serco hasn't suffered any major Covid-19 incidents at any of its locations. The same policies will be set in place for this application and are referred to in paragraph 3.51 below.
- 3.50 Serco's robust translation services are utilized in consideration of all service users, those translation services being provided by the Big Word with a 24-hour service.
- 3.51 In response to the Covid-19 pandemic, Serco has developed, trained its staff and deployed the following processes which are regularly reviewed and updated:
- COSHH Assessment – SARS-CoV-2 Covid-19
 - Occupational Health, Safety and Welfare – Risk Assessment – GP Referral Assistance
 - Occupational Health, Safety and Welfare – Risk Assessment – Generic BAU Activities
 - Occupational Health, Safety and Welfare – Risk Assessment – Transportation of Service Users (asylum seekers)
 - Covid-19 – Outbreak Management Plan
 - Guide to Action – Covid-19
 - Safe System of Work – Management of Covid-19 in Serco AASC
 - Safe System of Work – Transportation of Service Users (asylum seekers)
 - Safe System of Work - Cleaning of potentially contaminated areas
- 3.52 Serco continue to work with PHE, Health Authorities and other agencies to enable our Service Users to have access to testing and vaccination services and to ensure full understanding of the lockdown and restrictions that were put in place.
- 3.53 More generally, in relation to health and safety, Serco has developed, trained its staff and deployed the following processes which are regularly reviewed and updated.
- Safe Working Practice, Infection Control – Serco AASC
 - Comprehensive Health and Safety processes, systems and controls are in place, trained to all relevant staff and reviewed regularly

4 Planning History and Permitted Use

Introduction

- 4.1 The Use Class of the proposed development comprised of Initial Accommodation (IA) and Dispersed Accommodation (DA) for asylum seekers is Sui Generis.

Planning History

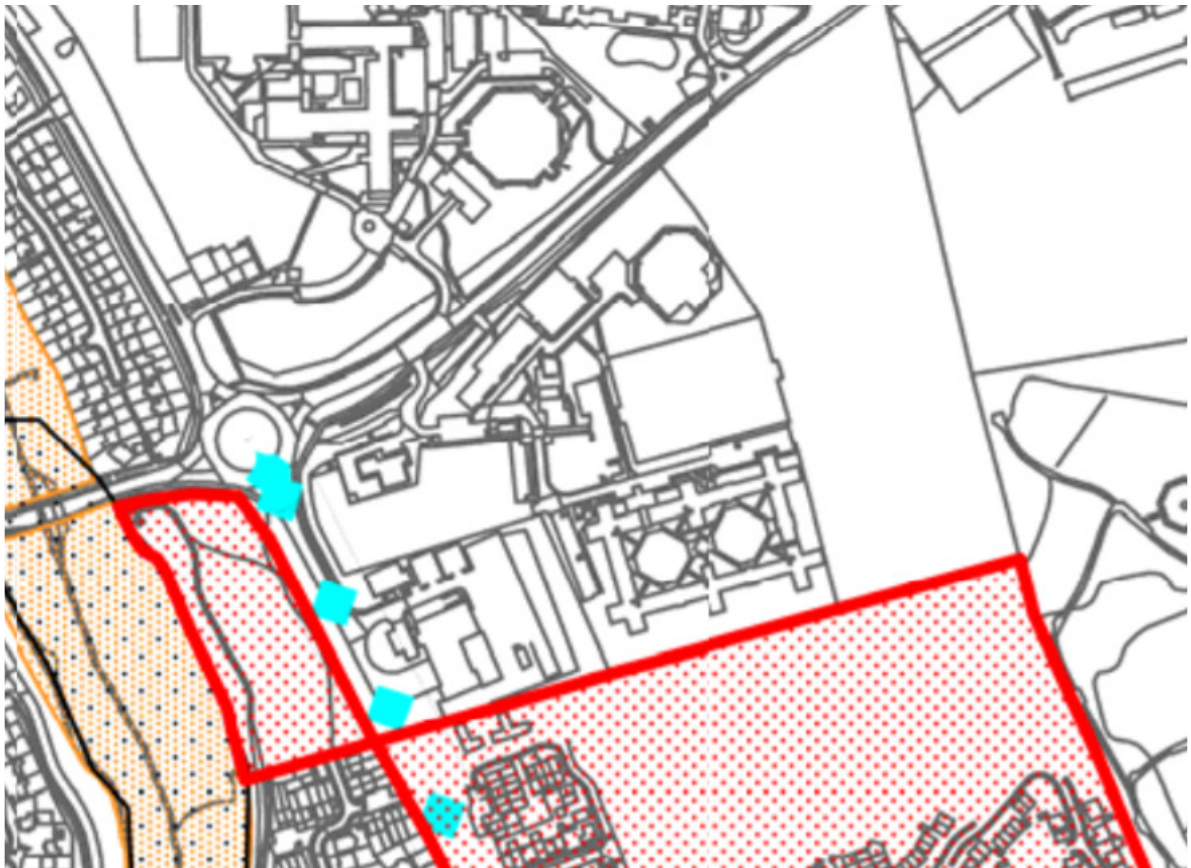
- 4.2 The site planning history indicates that Stafford Court was developed in two phases with the western section being the original.
- 4.3 Planning permission for phase 1 (ref: 32382) for the development of student accommodation was granted on 29th January 1996 following referral to the Secretary of State, as a departure application.
- 4.4 Planning permission (ref: 32526) for car parking in association with residential accommodation was granted on 29th January 1996.
- 4.5 Planning permission for phase 2 (ref: 34130) comprising a further 312 bedrooms was granted on 6th February 1997. It is noted that condition 10 of the permission required at least 144 car parking spaces to be provided.
- 4.6 The Use Class Order 2020 defines this type of student accommodation as Sui Generis.
- 4.7 The description of development on the planning permission confirms that the development is accommodation for students. The use of the accommodation by anyone other than students requires planning permission.

5 Planning Policy Framework

- 5.1 As required by s.38 of the Planning and Compensation Act 2004, planning applications must be determined in accordance with relevant policies set out in the appropriate development plan, unless material considerations indicate otherwise.
- 5.2 The main planning policies at national and local level relevant to the determination of this application are summarised and explained in this section.
- 5.3 The current planning policy framework comprises the National Planning Policy Framework (2021) and the adopted development plan currently comprises the Stafford Plan (2014) and the Stafford Plan Part 2 (2017).

Development Plan Policies

- 5.4 An extract of the adopted Local Plan Proposals Map is shown below, which indicates that the site is unallocated, i.e., there are no land use specific policies for the site.



Site Allocation: Composite Policies Map (source: Stafford Borough Council)

Stafford Local Plans

- 5.5 The adopted Plan for Stafford Borough was adopted in 2014. Spatial Principle (SP1) sets a presumption in favour of sustainable development and confirms the LPA will *'work proactively with applicants and communities jointly to find solutions.'* Further, it states that:

'Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

i. *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*

ii. *Specific policies in that Framework indicate that development should be restricted.'*

- 5.6 Policy T1 Transport encourages sustainable transport through reducing the need to travel by private car by ensuring good access to public transport and encouraging walking and cycling. It requires new developments to produce Transport Assessments and Travel Plans.
- 5.7 Policy N1 sets out principles guiding the design of new development. Insofar as it is relevant to this change of use application, the policy encourages uses to be grouped in order to provide access for all.
- 5.8 The Stafford Plan Part 2 identifies the site as being located within the settlement boundary of Stafford. It remains an unallocated site. There are no policies specifically relevant to the provision of accommodation for asylum seekers.
- 5.9 In summary, the Development Plan sets a presumption in favour of sustainable development. Where there are no relevant policies, as is the case with the application site, the Council will grant planning permission unless any adverse impacts would significantly and demonstrably outweigh the benefits and if specific policies within the NPPF indicate development should be restricted.

National Planning Policy Framework 2021

- 5.10 The NPPF introduces a presumption in favour of sustainable development. For decision taking, this presumption means:
- Approving development proposals that accord with the development plan without delay.
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed³; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.11 The key paragraphs of the NPPF for this appraisal are considered to be:
- Paragraph 8 - Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
 - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity;

³ No policies are relevant to the application site.

and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- Paragraph 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- Paragraph 112 - Within this context, applications for development should:
 - a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Planning Practice Guidance

Determining a Planning Application

- 5.12 The PPG states that a material planning consideration is one which is relevant to making the planning decision. The scope of what can constitute a material consideration is very wide and it is for the decision maker to decide what weight is to be given to each material consideration.

6. Planning Assessment

Principle of Development

- 6.1 The existing use of the site is student residential (Sui Generis). The proposed use is residential accommodation for asylum seekers (Sui Generis). Whilst planning permission is required for the change of use, the type of use and proposed function of the application site does not change, i.e. it remains a bespoke residential use for a specific group of people.
- 6.2 The intensity of the use of the site will reduce, as the overall capacity of the site to be reduced by over 13% from being able to accommodate 556 people to 481 people. This reduction in capacity results from an internal refurbishment of the building to provide larger residential units to meet the requirements of the occupants.
- 6.3 Furthermore, the reduced on-site population will have a reduced requirement for services compared with the previous student population, specifically:
- 171 IA residents will receive on site health care. None was previously provided to students. Serco is working with the Home Office to understand if this health provision can be extended to the DA community.
 - Public transport demand is likely to be reduced when compared to the student accommodation, as asylum seekers cannot work and journeys will be limited to occasional trips to the town centre and other service locations.
 - There will be no requirements for education services.
- 6.4 Accordingly, whilst the proposed use will have an impact on local services, when compared with the larger student population of 556 people the impact on the local area is less than the established use.
- 6.5 The IA facilities are the only part of the site where families stay and the support services they will need (education and health) during their short stay within the facility, typically four weeks, are delivered independently and therefore do not require any support from the Local Authority infrastructure.
- 6.6 The car parking requirements for the proposed use are limited to staff working at the site or visiting service providers. Asylum seekers will not own cars and drive to and from the site, as they cannot work and have a very limited income for their stay at the site. Accordingly, asylum seekers will travel by foot, cycle (there is a charity bike scheme that will run from the site helping service users learn to maintain bikes), public transport and private shuttle services to specific destinations (as required). Consequently, the proposal will have a net beneficial impact on the highway network, as evidenced by the Transport Statement submitted with this application.
- 6.7 The DA would only be used to accommodate single males or single females. No families will be accommodated resulting in no impact on school places within the local area. During their stay within IA, children are not permitted to attend school.
- 6.8 Services to meet the needs and requirements of the asylum seekers will be provided on site and the site will be managed 24 hours per day.
- 6.9 Within two miles of the Stafford Court site there is a mosque, a temple and approximately fifteen other places of worship which is almost identical to the concentration of both the mix and number of places of worship within the same proximity to the IA site in Birmingham.

- 6.10 The application site provides open amenity space within a wide courtyard located centrally and surrounded by the accommodation blocks. Noise associated with the use of the amenity space will be contained by the existing buildings thereby reducing any impacts on the amenity of nearby residents.

Sustainable Development

- 6.11 The NPPF is clear a presumption in favour of sustainable development should be applied (paragraph 11), and that the economic, social and environmental dimensions of sustainable development should not be considered in isolation. Where sustainable development accords with the Development Plan it should be approved without delay. Where there are no relevant development plan policies the NPPF states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the framework as a whole.
- 6.12 There are no site-specific planning policies for the application site and so the proposed use of the site has to be considered against policies contained within the Development Plan and the NPPF.
- 6.13 The application site is located within flood zone 1 and is therefore an appropriate site for the proposed use.
- 6.14 There are no listed buildings on the site or surrounding the site.
- 6.15 No trees are proposed to be removed by the proposed development and no site ecology will be affected by the proposed works, which are limited to internal alterations.
- 6.16 A Transport Statement demonstrates that the proposed development will have a net positive impact on the highway network and consequently on air quality. A Travel Plan for the site is also submitted with the application.
- 6.17 Noise associated with the proposed use will be limited due to the location of the open amenity space being located centrally within the site. Additionally, as the buildings are managed 24 hours per day any noise disturbance will be kept to a minimum. It is considered that the proposal will not result in adverse impacts on amenity in terms of loss of privacy, overbearing impacts and noise for both local residents and asylum seekers living on the Site.
- 6.18 The three categories of development benefits that constitute sustainable development are discussed below.

Economic Benefits

- 6.19 The proposed development meets the economic dimension by providing appropriate space of the right type to support the provision of accommodation for asylum seekers.
- 6.20 The proposals will provide new jobs during refurbishment of the buildings, as well as in the supply chain, and in the operation of the site, which has been largely vacant for several years.

Social Sustainability

- 6.21 The proposed use will provide much needed accommodation for asylum seekers in line with the Government's objectives. The scale of the accommodation is entirely appropriate for Stafford Borough and consistent with the ratios for provision set nationally.
- 6.22 The proposed use will enable the integration of asylum seekers into the UK in a location that is well-designed and safe with accessible services and open spaces to meet their needs without impacting on the wider area. The support provided as part of the scheme will benefit the health, social and cultural well-being of its residents.
- 6.23 A public consultation exercise has been undertaken by Serco in advance of submitting this application. A Statement of community consultation is submitted with this application. Among responses received was the following statement, which summarises the social benefits associated with the proposed development:

"I wholeheartedly support the proposals. This facility stands empty and does not serve any purpose at the present time. It would be good to see it puts to use for such a worthy reason. As a parent of two young daughters I also welcome the opportunity to bring my children up with a greater understanding of the lives, cultures, and difficulties of others from parts of the world where life is different to our own."

Environmental Sustainability

- 6.24 The existing buildings on site have been largely vacant for some time and makes little positive contribution to the surrounding area.
- 6.25 The redevelopment will make more effective use of an existing site by bringing the building back into beneficial use whilst also reducing intensity of the use thereby having a net beneficial impact on the local highway network and existing local facilities.

7. Conclusion

- 7.1 The planning application has been assessed against legislation and policies contained within the Development Plan, the NPPF and other material considerations. This assessment demonstrates that the proposed development constitutes sustainable development as defined within the NPPF.
- 7.2 The NPPF and the Development Plan sets a presumption in favour of sustainable development. LPA's are directed to approve without delay proposals that accord with the Development Plan.
- 7.3 The proposed use constitutes sustainable development, which will deliver economic, social and environmental benefits. The proposed use will have a net benefit on the local highway network.
- 7.4 The proposal is consistent with relevant policies contained within the Development Plan. Where there are no relevant policies, as is the case with the application site, the Council will grant planning permission unless any adverse impacts would significantly and demonstrably outweigh the benefits and if specific policies within the NPPF indicate development should be restricted.
- 7.5 It is acknowledged that there will be some impacts of accommodating 481 asylum seekers on the site, such as the need to provide health care facilities for 310 of the DA residents, the use of public transport, parks and other local facilities. However, when compared with the large student population of 556 people where no on-site support services were provided, the impact of the site's residents on the local area will be reduced.
- 7.6 In the absence of any adverse impacts that significantly and demonstrably outweigh the benefits of the proposed use, it is respectfully requested that planning permission be granted without delay.