

[REDACTED]  
**Director for Children and Families**

Development Manager  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

Staffordshire County Council  
2 Staffordshire Place  
Tipping Street  
Stafford, ST16 2DH

Our Ref: [REDACTED]

Your Ref:

Date: 13 July 2022

Dear Sir

**Stafford Borough Council Planning Application 22/35765/FUL:  
Former University Halls of Residence Stafford Education and Enterprise  
Park Weston Road Stafford Staffordshire ST18 0AB**

**Change of use from student accommodation to asylum seeker  
accommodation**

Thank you for the opportunity to comment on the above planning application which I do in my capacity as Interim Director for Children and Families which encompasses the leadership of resettlement.

The comments contained in this letter are in addition to the responses already provided by Staffordshire County Council in its capacities as Highway Authority, Education Authority and Lead Local Flood Authority.

I consider that the impacts of the proposed development on the local area, community and services are likely to be considerable and detailed mitigation measures need to be in place to address and control those impacts from the outset and on the assumption that the change of use may in due course become permanent. Potential impacts of the proposed development if not sufficiently controlled/mitigated relate in particular to:

- Based on the information so far provided it is concluded, as previously indicated, there would be no impact on local school places in respect of primary or secondary education. This has been determined based on the Design and Access Statement which states that education provision is being provided on-site by Serco for families being accommodated in the IA facilities and that the children are not permitted to attend school. This needs to be secured by a planning obligation. However, there is no specific mention of early years or post 16 education within the planning application so if these are not provided on site there will be an increased demand for local services. Further information should be sought from the applicant;

- It has now been confirmed by the applicant that in respect of health care services none will be provided on site to the DA residents thereby increasing demand on local services. Asylum seekers are likely to have more challenging health needs than students due to such factors as trauma they may have experienced, poorer health generally and needing support such as vaccinations as well as acute care. We ask that you confirm with local health providers what impacts need to be mitigated;
- Public concerns that the accommodation is too close to schools and residential areas relating to safety of the community. Public concerns also about lack of facilities for the asylum seekers due to the location of the accommodation being outside of the town centre. The nature of the self-containment of the development may provide a barrier to integration. These are material planning considerations that should be carefully considered in the decision-making process.

If granted, any planning permission must provide for the following mitigation either by planning condition or planning obligation in order to 'make good' the assumptions made in the planning application documents:

- The temporary use of the premises until 2029.
- All proposed internal building alterations to be completed in accordance with the approved plans before occupation for the proposed use;
- Provision of outdoor recreational area before occupation for the proposed use;
- Before commencement of the use, submission for approval (and subsequent approval) of a Site Management Plan;
- Site Management Plan to contain/require:
  - No accommodation of families in the DA block.
  - No sharing of clusters by different families.
  - Segregation of accommodation for families from accommodation for single adults and of accommodation for single males from accommodation for single females.
  - Defined management structure for the IA and DA and Site Management Plan to include named managers/officers and roles and staffing numbers.
  - Provisions for the review, updating and (where necessary) the amendment of the Site Management Plan.
  - The establishment of a "Forum" to enable and provide for regular meetings with partner organisations such as NHS, Migrant Help, Police, Fire Service, District Council and County Council as well as the local community and faith groups to ensure effective and appropriate operation of the accommodation and community cohesion and harmony.
  - Procedures to ensure cleaning and maintenance of the accommodation to a high standard.
  - 24 hours a day staffing and 24-hour access to a telephone-based interpreter service.
  - Advise to occupants on conduct both within and outside the accommodation provided.

Require occupants to obtain approval from Serco/Home Office before leaving the accommodation for more than 24 hours.

Provide for on-site recreational, instructional and informative activities for all the occupants at an appropriate level and frequency including adult educational programmes.

Comprehensive Health and Safety processes, systems and controls including training to staff and subject to regular review.

- Compliance at all times with the approved Site Management Plan;
- Maximum bedspace and occupant numbers;
- Provision of adequate car parking spaces and bicycle storage;
- Provision of a shuttle bus service for residents to travel to and from nearby urban centres and all necessary appointments as well as availability of transport for ad hoc purposes as necessary on request;
- Provision of a health care provider on site for IA residents so local services will only be required in the event of a medical emergency.
- Provision of education to children residing at the site including early years, primary, secondary and post 16 teaching.
- Implementation of Covid 19 and other infectious diseases management systems including to provide for testing and vaccinations.

If it is proposed to grant the planning permission it is requested that Staffordshire County Council is consulted upon and if appropriate made a party to any related s106 planning obligation.

In conclusion therefore, and based on careful consideration of the information so far provided by the applicant as measured against what can amount to material planning considerations, this authority does not have any objection in principle to the proposal. However, it has to be said that there are a number of important factors which I have set out in my letter which give rise to very great concern about the development proceeding.

I hope that the above comments are useful and if you require any further clarification please let me know.

The County Council reserve the right to comment further in the event that additional information relevant to the application becomes available.

Yours faithfully

  
**Director for Children and Families**