

Turnberry Planning Limited
41-43 Maddox Street, London, W1S 2PD

Tel: 020 7493 6693 Fax: 020 7493 2393
Email: info@turnberryuk.com

June Pagdin
Planning Department
Council Offices
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

TurnberryPlanning

24th November 2015

Our ref L WHC 24.11.15 UH-CH
Your ref

Dear Ms Pagdin,

Comet Hotel

Objection to Application for the extension and refurbishment of the Grade II listed hotel and erection of student accommodation comprising 361 beds, landscaping and associated works – Application 6/2015/1997/MAJ

I write on behalf of the University of Hertfordshire with regard to the above planning application, further to initial concerns expressed by the University at the Development Consultation Forum meeting on the 9th September.

Summary

The proposal undermines the University's 2020 Estates Vision, compromising the University's on-going investment in student accommodation on its campus by competing for international students already provided for, or to be provided for as part of the University's on-campus scheme. The data used by the applicants in support of their case is out-of-date and rests on inaccurate assumptions. The proposals also compromise the welfare of students through the lack of onsite pastoral care and absence of essential supporting facilities such as open space and car parking. We recognise the impacts of this scheme on the local community, particularly as the proposals are not aimed at lowering demand for HMOs in Hatfield, but simply intensifying student activity off-campus. To date, the University has delivered circa 1,700 rooms in the space of 12 months, and a further 800 rooms will come on stream next year, taking the total investment of on-campus provision to circa 4,600 rooms. The University's scheme, specifically designed to house all of their first years that require accommodation and all of their international students, should be allowed to take root before further land is allocated to student accommodation. The Ramada site should be devoted to other uses for which there is proven demand.

As a result, the University **objects** to the application.

The University's 2020 Estates Vision and Need

The University of Hertfordshire's 2020 Estates Vision is recognised by the Council as a material consideration in determining future planning applications. The University is committed to delivering just over 2,500 modern-purpose built bed-spaces (an increase of c. 1,500 on its current provision) in pursuit of its core principle: placing campus living at the heart of the student experience. Community engagement was a key driver within the University's Strategic Plan and, through various partnerships and joint undertakings, the University is dedicated to minimising off-campus impact.

The principle of development of on-campus student accommodation was endorsed within the Welwyn Hatfield District Plan. Policy H11 sets out that:

"The Council will approve proposals by the University of Hertfordshire to provide student accommodation on campus provided that the resulting development does not have an adverse effect on the environment of the campus or the amenity of adjacent communities."

The planning application material states that there are 6,887 students in the community over and above the stock of available, managed bed-space. This simple equation the applicants suggests, is that this represents the unmet demand for this accommodation in Hatfield. In reality, the University is already in the process of meeting the maximum commercial demand. To date, the University has delivered circa 1,700 rooms in the space of 12 months, and a further 800 rooms will come on stream next year, taking the total investment of on-campus provision to circa 4,600 rooms.

This meets the University's known demand for student accommodation from international students and those first year students who express an interest in managed accommodation. Second and third year students prefer a house in the community to purpose-built accommodation. These students prefer to live in a house as opposed to a cluster flat or 'twodio' as proposed in this case. That is why the University is constructing a large number of town houses on campus to try and make its accommodation more aligned to the requirements of the student housing market.

This is not only due to a question of personal choice by young adults wishing to experience living in the community for the first time, but also relates to affordability.

The applicants were responsible for the Curzon Point scheme on The Common. A reasonable assumption would be that the proposed rooms are to be rented on a similar basis, i.e. on a 51 week basis, at approximately £7,000 per year. By comparison, these rents are in excess of what the University will charge – circa £5,000 for a 42 week let – and are significantly above what students pay for a room in a typical house in Hatfield (est. £4,335).

This underlines the point the University already understands: there is limited demand for purpose built cluster flat accommodation from students already in the community and that this scheme is directly competing with the provision already being delivered by the University. The proposed scheme is targetting international and first year students, as confirmed by the applicants at the Development Consultation Forum.

The proposed development is therefore not providing affordable student housing that will contribute to the reduction of HMOs in Hatfield. Therefore, the proposals are contrary to Policy H2 of the adopted District Plan as they are not providing housing for an identified need.

Not only does this development fail to meet housing need, it also risks causing detriment to the surrounding community. Isolated student developments lacking effective oversight from the University, can result in behaviour-related problems which are a great source of concern to the Council and community, and justify the refusals of schemes such as the Common and College Lane North. This is precisely why purpose-built on-campus student accommodation is at the heart of the University's 2020 Estates Vision.

The University would question why this site is not delivering general residential accommodation or other uses/facilities for which there is proven and unmet need. For now, the University's substantial investment in student accommodation to meet known demand should be allowed to complete in full before further decisions are made on the supply of additional student accommodation.

As a final point, the University would like to point out that much of the data relied upon within the Planning Statement is out-of-date and uses inaccurate assumptions.

Amenity and Welfare

As a privately managed development, any students residing there would fall outwith the University's oversight and therefore unable to be directly supported by the welfare and pastoral care the University provides. This is particularly concerning when you consider that the scheme will target mainly international students who generally require a greater level of support.

In physical terms, the development appears monotonous and lacks open space: the open space between the hotel and student accommodation buildings is taken up by a car park, for use by the hotel. This arrangement compounds the issues around welfare and is a threat to student experience.

Student welfare may be jeopardised at the expense of a management structure falling outwith the University's oversight and may not prioritize the students' best interest. In accordance with the 2020 Estates Vision, the University is delivering a balance of accommodation, car parking, landscape, facilities and services within a physical campus setting, which should be the preferred form of development, as the Council has recognised in endorsing the 2020 Estates Vision.

Parking

The proposed development is to be car free to students. This is contrary to the Parking Standards for the area which the University complied with when it provided 1 parking space for every 12 students living on the College Lane Campus.

A car free development is also unenforceable and will cause overspill into existing streets, causing greater tension with local residents. The University is working to lower the impact of students on the local community and we are concerned that this proposal will reverse that trend and moreover, will create a development over which the University has no oversight or influence.

In summary, the University objects to this scheme because:

- Demand for first year and international students is being met by the University's on campus scheme (currently in the process of being built);
- 2nd and 3rd year students do not want to live in purpose built student accommodation of this type and certainly not for 51 weeks;
- The rents are unaffordable and the development does not meet local housing need, competing instead with the 2020 estates Vision;
- The lack of amenity space and student welfare facilities and pastoral care support is a real concern;
- There is no parking compared to an on-campus parking provision of 1 space per 12 students;
- The resulting negative impact on the community will be significant;
- The data used by the applicant is out of date.

Without the University's endorsement and involvement, new speculative proposals for student accommodation are contrary to the endorsed 2020 Estates Vision, contrary to the welfare of the students and to the wishes of the local community, which have been clearly communicated in response to similar proposals, and contrary to planning policy.

I trust this letter is of assistance, but should you have any queries about its content, do not hesitate to contact me directly.

Yours Sincerely

Chris Pattison
Turnberry Planning

cc. **Ellenbrook residents Association**
Hatfield Town Council
Councillors Broach, Juggins and Watson