<u>15/02460/FUL - Building 58A and adjoining land Salisbury Road, University of Southampton S017 1BJ¹</u>

Development of a new teaching and learning centre comprising lecture theatres, seminar rooms, teaching and learning spaces and a cafe with supporting landscape, infrastructure and other ancillary works.

Representation of Highfield Residents' Association

The HRA recognises the benefits that the University brings to the City and locality and wishes to support its aim to become one of the world's leading academic institutions. However the HRA objects to the current application in its present form for the following reasons (as explained in the notes below):

- A. The proposal would inevitably substantially add to the University's capacity to further increase student numbers and there should therefore be a corresponding guaranteed increase in student accommodation in accordance with SCC LP Policy H13;
- B. There is no recognition of the historic and landscape importance of the nearby Common when such a development might be expected to provide some 'planning gain' environmental improvements, in particular to the western end of Salisbury Road and that entrance to The Common (in accordance with LP Policies SDP 8 and HE 5);
- C. There is inadequate analysis of and measures to encourage sustainable transport potential within the campus and links to pedestrian and cycle routes outside the campus (contrary to the requirements of LP policy SDP 4).

A. Impact on student accommodation demand

- 1. The proposal is for a (very substantial) 6,206.5 m² net increase in floorspace. The application is accompanied by copious reports on drainage, ecology, archaeology and transport. Nowhere in the Planning, Design and Access Statement is there any mention of how the proposal relates to the University's business strategy and increases in student numbers.
- 2. Relevant planning policies are rehearsed except for policy H13, which is not mentioned. H13 in effect requires developments that would increase student numbers to be accompanied by a corresponding increase in student accommodation (see appendix 1 below). It can only be assumed that the applicant considers the floorspace to be not contributing to an increase in student numbers on the basis that it would provide a qualitative improvement in facilities rather than a quantitative increase in capacity. If that is the case, nowhere is it explicitly stated.

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- 3. Such a stance is wholly implausible and cannot reasonably be accepted by the planning authority for the following reasons:
 - a. Within the stock of floorspace available to the university for all uses there are continual adjustments to the precise use of the various parts – between direct contact teaching/research, student work areas/libraries and supporting administration/ management – designed to optimise use of space within the context of the steady planned increase in student numbers. This can take place outside planning control.
 - b. New building/floorspace is inevitably added in stepped intervals and any one addition may or may not be for direct contact teaching, but nevertheless adds to the total floorspace stock that can be adjusted in the way it is used to improve both quality and quantity of teaching/research/administration capacity overall. In this case the spaces released from the teaching activities within individual departments by the new centralised facility will be put to other use which it is difficult to comprehend will not contribute overall to increasing the student capacity in time if not immediately.
 - c. There have been several large developments in recent years, including the Boldrewood campus and the Institute for Life Sciences, since the Local Plan was adopted in 2006 with policy H13. The draft of the policy would have been in place for 2-3 years before that as a material consideration. Yet the HRA is not aware of any instance of when a University development has been subjected to the requirements of policy H13 or of reasons as to why those developments should be exempted. That may well have been unlawful, given that statutory development plan policies must be adhered to unless material considerations indicate otherwise.
 - d. A development of a centralised teaching facility of this size will inevitably have a systemic effect on improving the quality and increasing the capacity of teaching in one of the country's major universities. If SU and SCC consider that this proposal does not fall within the remit of policy H13, then it would be instructive for them to describe exactly what past or future University development has or would do so, against a backdrop of a steady increase in student number in the past and planned for the future.
- 4. With government limits now removed it can only be assumed that the steady increase in student numbers over the last 15-20 his will continue. Indeed an increase of approximately 3% p.a. was mentioned by the project director at the public exhibition held in December 2015. Current (2013/14) numbers are approx 24,000² FTE UG & PG so 3% pa would result in 32,250 by 2023/4 an increase of over 8,250. That past rate of growth would imply about 17,500 students in 2003/4, having increased by 6,500 up to 2013/14 although taking information made available (see appendix 3

² Higher Education Statistics Agency

below) at the time of consideration of the recent private proposal on the old bus depot Portswood there appears to have been an increase of 3,000 (14%) in the one year 2012/13 - 2013/14.

- 5. There has been no information provided with the planning application on student numbers and none can be found online; and the 2020 Vision is also devoid of numbers, but talks much about 'growing' in various ways. There must also be a business plan that provides the financial strategy within which assumptions about student numbers and income are co-ordinated with expenditure on buildings and staff; this is not readily in the public domain but is understood to be disclosable under FOI requirements.
- 6. The University professes great concern that it should not have a detrimental effect on local communities. It cites a new accommodation strategy and recent student accommodation developments as evidence of how it is limiting and reversing the effects. However with all recent developments the accommodation has only increased from 5,000 to 6,500 student units in the last few years (see appendix 2 below). If the impact on family housing and the local community were to be held still (let alone improved) then the existing stock of student accommodation would need to be more than doubled i.e. over 8,000 additional accommodation places to keep pace with the anticipated increase in student numbers in the next 10 years 2013/14 2023/24. Despite much anecdotal reporting of student accommodation schemes, the HRA is unaware of any University or other plans to increase student accommodation on this scale.
- 7. The effect of a continuing planned increase in students without a corresponding planned increase in accommodation would be to 'dump' the problem on the surrounding community. It would further very substantially exacerbate the destructive effect on local communities that the growth in student numbers unrelated to any matching increase in accommodation has already caused in some localities due to the inability of families to compete financially with the much higher gearing on capital that HMO use of family dwellings generates.
- 8. Therefore, before permission for the proposal can be entertained, in order to be able to make a rational assessment against LP policy H13, the City Council should be requiring of the University:
 - a. a comprehensive audit of past, present and future student numbers and floorspace and of existing and planned student accommodation;
 - b. a co-ordinated (publicly available) plan for further increases in accommodation corresponding with and in advance of further increases in student numbers;

and should in the meantime refuse this and other developments that contribute to increasing the University's student teaching capacity.

B. Environment – The Common

9. Most of the western edge of the Highfield Campus bounds The Common – one of the City's most prized historic and landscape assets. Past University developments, however, have tended to turn their back on The Common,

treating it as a piece of undeveloped 'gash' land rather than an important landscape feature to be respected. For example, it is difficult to think of other instances in Southampton or other cities where the flank of such a massive and overbearing structure at the northern end (Computer Sciences) is placed so close to the boundary of a park/public open space (arguably in contravention of LP policies SPD8/HE5 – appendix 4).

10.Whilst this proposal does not abut The Common, it does incorporate proposals for environmental improvement of parts of Salisbury Road. Given the University's close physical relationship to The Common and that the western end of Salisbury Road issues on to The Common which provides the pedestrian and cycle link to the Glen Eyre/Burgess Road crossing it would not be unreasonable to expect as a planning gain contribution some improvement to the entrance to The Common to give recognition to its importance and removal of the anachronistic remnants of the unused stub end of a road designed for vehicle priority.

C. Transport

- 11.Most of the accompanying Transport Statement relates to analysis of road junctions and parking. A gesture to sustainable transport is made in the form of the proposed 'enhancements' to Salisbury Road to provide flush contrasting surfaces to indicate a negotiation between pedestrians and cars rather than pedestrian priority. Whilst this is claimed to be within current standards, where used elsewhere in the City it is the writer's view that they lead to confusion and allow those drivers who feel there should be no impediment to the free flow of traffic to assert their priority over pedestrians – the reverse of the proclaimed policies of the SCC LP and of SU's Travel Plan (see appendices 5 and 6). Effective check on vehicle speed and assertion of pedestrian priority requires crossings at the same height as the pavements with a vehicle ramp to physically check vehicle speeds – as has been successfully long applied on University Road.
- 12.In relation to cycling, there is a token reference to the City Bike Guide Map 2012 illustration of existing routes over the entire city. There is no assessment of the existing and potential pedestrian and cycle flows/desire lines within the campus and how routes within and surrounding the campus should be improved to accommodate and encourage these sustainable forms of transport. Even without looking to encourage walking and cycling, the proposal must represent a significant disruptor of existing patterns, as students will be accessing a single hub for lectures, rather than facilities dispersed across the campus.
- 13. The University professes great concern to encourage sustainable transport including walking and cycling (see SU Travel Plan appendix 5). It states that (within the campus) matters are kept continually under review to give priority to walkers and cyclists over vehicles wherever possible in order to convince people to change their mode of travel. Yet this is patently not the case



..... more a matter of talking the walk than walking the talk.

- 14.Passing up the opportunity of the currently proposed development to critically appraise walking and cycle routes within the campus and links to the surrounding network is bizarre; one would have thought it to be in SU's own interest. In any event it conflicts with SCC's policies that in effect require an appraisal and appropriate proposed measures to accompany an application (see appendix 6).
- 15.For example for student and staff cycle travel from the proposal southwards to and from the city and the Avenue Campus could be directed down the service road running parallel to The Common. That would potentially take some traffic off Lovers' Walk on the Common where there is pedestrian/cycle conflict and avoid the same conflict on the narrow shared routes with high pedestrian volumes within the Highfield campus.
- 16. The main pedestrian and cycle link to the Avenue Campus shown in the photograph continues into a set of dank, dark, dangerous steps, which are entirely unsuitable for cyclists, issuing on to The Common. SCC has applied for planning permission to widen the link from the top of the steps to Lovers' Walk; this is opposed by the HRA because of the environmental damage to the appearance of The Common. There is also potential for an alternative route suitable for cyclists as well as pedestrians on University land that would cause less harm to The Common.
- 17. There is no adequate consideration given to secure cycle parking which is an essential ingredient in persuading people into that form of transport rather than the car.

Simon Hill MRTPI On behalf of the HRA

Appendix 1

Southampton L P Review adopted version 2nd revision (2015)

H 13 New Student Accommodations

Development by private sector providers and higher education institutions, which would result in an increase in student numbers, will only be permitted where suitably located and where residential accommodation is provided at a level to be agreed with the council. Permission will be subject to:

- (i) an assessment of the number of additional full time undergraduate and postgraduate students requiring full time accommodation, in order to ensure that a demonstrable need for such provision is satisfied;
- (ii) the phasing of any residential development to accord with that of any academic expansion;
- (iii) the accommodation being easily accessible by foot, cycle or by public transport from the relevant educational establishment;
- (iv)an agreement to control and manage the level of student car parking being made with the appropriate developer; and
- (v) the occupancy of the development being controlled through the imposition of planning conditions or an appropriate legal agreement.

Appendix 2

Response to questions for the University of Southampton with regard to [Southampton City Council] Scrutiny Panel A [2015] - A Call for Inquiry For Evidence in Respect of the Effectiveness of the Council's Article 4 Direction and Houses in Multiple Occupation – Supplementary Planning Document (HMO SPD)

1. The University of Southampton has concerns relating to housing pressures on the City of Southampton in general, in that houses in multiple occupation, owned by landlords concerned only with income, can lead to both poor quality standards for the occupants of those houses as well as the general and creeping degradation of the neighbourhood and community. This is both to the detriment of the citizens of Southampton, the general quality of the environment within Southampton and also (potentially) sub-standard conditions for the occupants of those houses. Furthermore, the degradation of residential environments potentially deters commercial investment from both within and without the city. An attractive, safe and affordable residential environment is a key element of the decision making process for investors bringing employment and economic activity to the city.

2. The University is currently in the process of completely revising its Accommodation Strategy for student residences and at present has two developments underway, Mayflower Halls of Residence and City Gateway, which collectively, will introduce 1,489 additional bedroom units to the City for the purposes of student occupation. A recent decision has also been made by University Council, to progress with the development of our Chamberlain Hall site which ultimately will yield 379 bedrooms in the first phase and in the second phase, a further 41 units, ultimately producing a total of 420 units. This however, will not be deliverable before 2016. This will increase our capacity from approximately 5000 to 6500 units. In parallel, consideration will be given as part of the revision of our Accommodation Strategy during the calendar year 2014, to an additional expansion of student bedroom places, to further alleviate pressure on the City housing stock. This will be given consideration alongside a strategic review of future potential student numbers which in the current economic conditions and so soon after the introduction of increased fees, will be subject to some volatility. With regards to the impact that these proposed developments may have on reducing housing pressures in the City, the University of Southampton believes that there will be a beneficial impact in that there will be a wider choice for students and with an increased focus on development in the City Centre (Mayflower Halls), a substantial contribution to the re-invigoration of the central Southampton area.

3. It is difficult to assess the impact that the HMO SPD has had on Southampton at a relatively early stage in its implementation. Whilst the University both recognises and welcomes a degree of greater control, it is also at pains to point out that HMO's are not solely occupied by students but by a wide range of citizens ranging from recent arrivals in the UK as well as young professionals and all social groupings in-between. The University has a concern that students, who may well be the future contributors to Southampton's economy, are not "victimised" in any kind of unintended way by unnecessary focus on them as a single use class.

4. The HMO Licencing Scheme, if applied appropriately, should both enhance control and quality of the HMO stock and potentially have the benefit of restricting the impact on certain specific neighbourhoods. That said, there must always be extreme caution applied, to ensure that unintended consequences are not created which might for example, result in further degradation of areas cause by properties falling into non-use or disrepair. It must always be remembered that the University of Southampton brings significant economic benefits to the city and the immediate region and this hopefully will, prevent any consideration of singling out students and stigmatisation.

5. The University is supportive of any attempt to improve the quality of housing for citizens of Southampton, whether they be families with a long history of occupation in this area, or relative newcomers including students. The University is keen that there may be no formation of "student ghettos" or any kind of single population type, such that, the general environment of the City of Southampton is negatively affected. The University is keen that Southampton as a city, becomes a city of high quality housing for all, with a focus on all citizens, including students (who may be future contributors to the Southampton economy) being encouraged to assist in the creation of a diverse and environmentally enhanced city.

Kevin Monaghan Director of Estates University of Southampton www.southampton.ac.uk/estates

Note of conversation with Orchard Homes 09.07.15

Student/accommodation numbers

Total number of students 2012/13 in Southampton:

Southampton University Solent University	21,000 ³ 10,000
Total	31,000
bespoke bed spaces 2015 ⁴ Southampton University ⁵ Solent/private	6,500 5,000
Total	11,000
Est. no. living at home ⁶ /in own home Est. no. in HMOs ⁷	6,000 14,000
Growth in student nos. 2002-2014 est. est. bed spaces built in then/in pipeline now	6,500 5,500
Southampton population (mid 2014 est.) ⁸ Proportion of which are students	245,300 13%
Less than 10% of existing accomm is self contained – may increase with demand from postgrad/mature /wealthy foreign students	
Ave, prop. of students in family homes (HMOs) ⁹ UK = 35%	

Ave. prop. of students in family homes $(HMOs)^9$ UK = 35% Soton = 50%

Est. prop. of dwgs in P'wood (ward?) in HMO use = 25%

³ 6,000 (25%) postgrad; 30% international (UK ave. 23%)

 ⁴ including commitments at 2015 (e.g. B&Q)
 ⁵ Including Mayflower 1,104; City Gateway, 325; British Gas nominated 325 (out of 430); aiming for 20,000 bed spaces by 2020 – own and private

⁶ Mainly Solent University students

⁷ At, say, 5 per house ave, = 2,800 HMOs?
⁸ Source: SCC website

⁹ Unipol (?) survey

Appendix 4

Southampton LP Review adopted version 2nd revision (2015)

SDP 8 Urban Form and Public Space

Planning permission will only be granted where the layout and form of buildings and spaces are integrated into the existing urban structure and relate positively to the public realm. Proposals should:

- (i) position doors and windows to create active street frontages;
- (ii) provide defensible space and a clear distinction between public and private space;
- (iii) provide townscape opportunities including the creation of public spaces which are well defined, usable and connected;
- (iv) retain and/ or enhance existing public art and through 'Percent for Art' take the opportunity to incorporate new public art where appropriate.

HE 5 Parks and Gardens of Special Historic Interest

Development will not be permitted which would detract from the character or setting of parks and gardens of special historic interest, including those on the national and local register.

Appendix 5

Extract from SU Travel Plan December 2014:

"4.3.1.1 The University recognises that good walking and cycling routes are essential; they should be as direct as possible, well lit and well maintained. The existing network of roads and paths across our campuses are regularly reviewed from a walker/cyclist perspective to see if improvements such as shortcuts or opening up alternative entrances and exits can be made, and to identify any maintenance issues. Priority is given to the pedestrian and cyclist over the motorist wherever practicable. This helps to convince people to change their mode of travel and improves the feel and safety of our campuses.

4.3.1.2 To create a step-change in behaviour by persuading people to walk and cycle, a number of 'showcase' routes have been targeted. It is proposed that these routes be comprehensively improved to create attractive, coherent and safe walking and cycling corridors for staff, students and the general public.

4.3.1.3 Routes identified as suitable for upgrade to 'showcase' walking and cycling routes are: (inter alia) Avenue Campus to Highfield Campus".

Appendix 6

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SDP 4 Development Access

Development will only be permitted where access into the development is provided in priority order for:

- (i) pedestrians and disabled people;
- (ii) cyclists;
- (iii) public transport;
- (iv) private transport.

2.28 To encourage sustainable transport modes, priority for the needs of certain groups over others should be given in the access into the site.

2.29 Not only is it important that travel to the site is safe and convenient, it is also important to ensure that on arrival, easy and safe access into the site can be made. The detailed design of access arrangements should ensure that priority is given in the order specified but not to the detriment of highway safety.