

## **Additional Comments by the Nottingham Action Group on HMOs (NAG) Subsequent to Revisions to Planning Application 20/00141/PFUL3: 406 & 408 Derby Road & Radmarsh Road**

The NAG has already made substantial and substantive comments about this application. In order to ensure that these, earlier, comments are not overlooked, and because they remain as valid now as they were when first submitted, if not more so, they have been included as an appendix to this representation. Therefore, the aim of these additional comments is to reinforce and update those observations made earlier in the appendix.

**1. Balance & Sustainability.** The NAG notes that the revised application includes an increase in the number of bed spaces from the 620 mentioned in an article in the Nottingham Post (12 August 2019), via the 690 bed spaces in the previous iteration of this application, to the 700 bed spaces in this current iteration of the scheme.

This 'creep' in the number of bed spaces must be viewed alongside the other, existing, 484 bed Unite development on Radmarsh Road, the approved, subject to a Section 106 Agreement, 222-bed PBSA on Radmarsh Road (19/02325/PFUL3), and the approved outline application at 3 Triumph Road (19/02581/POUT), initially for 204 student bed spaces, but then increased to 220 bed spaces. This latter application is also subject to bed space creep with a current application (20/02228/PVAR3) including another proposed increase in bed spaces to 270. Assuming there is no further 'creep', the projected number of new student bed spaces envisaged for this small area is 1,192, well on the way to three times the number of bed spaces in the in situ Unite development.

Of interest is the reference in the revised planning statement (Sections 3.4 and 3.6) to planning permission given for an application 'located in close proximity to the site' (19/01998/PFUL3) for a 703 bed space PBSA at Deakins Place off Ilkeston Road. First is the fact that the Deakins Place application site is **not** in 'close proximity' to the Unite application site, and at a location that is totally different in context and surroundings from that of the Derby Road site. Therefore, it is dubious, to say the least, whether the granting of planning permission at the Deakins Place site can be used, as the planning statement infers, as support for the Unite application. Indeed, we consider it has no relevance whatsoever to the present discussions and shows, if anything, how remote, uninformed and lacking in any on-the-ground knowledge and appreciation of the locality Unite and its agents are.

Returning to the question of the impact of this application on the balance and sustainability of this application, we emphasise again the imbalance in the local communities – very heavily weighted towards transient (non-Council Tax paying) student-occupation and with a range of amenities equally heavily weighted towards the student population – features which are well-documented as being detrimental to the well-being of the long-term resident population and inimical to its future survival, let alone its future growth and development.

In particular, we draw attention to the many occasions, both public and private, that Nottingham City Council has stated that the prime objective behind the development of PBSA is to return to C3 (family homes) use properties which have been converted into student-occupied C4 and sui generis use. Unfortunately, there is no substantive evidence for this despite the amount of PBSA that the Council has and continues to encourage. Instead, what has happened is that the increasing amount of PBSA has merely provided accommodation for an every-increasing expansion in student numbers by both universities with scant, if any genuine, concern for the impact on the local populations. In the case of Nottingham University this is emphasised by the fact that the university has written to support the Unite application whilst continuing to ignore pressing need for it to begin the development of substantial student accommodation on its own land on the Jubilee Campus on the former tobacco warehouse site

alongside Ilkeston Road and definitely in close proximity to existing PBSA as well as the Deakins Place development and student amenities.

In this respect, the Council's policies with respect to student accommodation, well intentioned as they originally were, have failed and continue to fail and, in doing so, fail the established, long-term residential populations which support so much of the social fabric of the neighbourhoods in which they exist, as well as continuing to provide fiscal support to the city itself.

For this reason alone, the Unite application must be considered in more than its immediate context and in the light of the precedent that it is more than likely to set, especially when the future of that part of the site which remains as a car dealership is examined, or indeed that of the remaining industrial/business units on the north side of the River Leen. All are clearly potential targets for future re-development as yet more PBSA.

**2. Design, Massing & Other Considerations.** The major part of the changes made by the applicants to the original proposal are an attempt to address technical problems associated with the difficulties that arise from the siting of the proposed building on the River Leen's flood plain and flood risk and to satisfy Environment Agency considerations with respect to this. The NAG, although it does not have the necessary expertise to be able to make informed comments on this, notes that the changes proposed by the applicants largely mimic those outlined in an application on Radmarsh Road for a 222-bed purpose built student accommodation (PBSA) development (19/02325/PFUL3) which received approval (subject to a Section 106 Agreement) in December 2019.

Other changes are largely cosmetic in nature and in practice do little or nothing to address the concerns the NAG expressed previously about the pedestrian and uninspiring design, the materials and, especially, the massing of the proposed development and its clear lack of respect for the immediate, Derby Road, local street scene.

This latter is exemplified by the fact that the applicants continue to refer to the predominantly residential area along Derby Road south of the site as consisting of 'a number of semi-detached and terraced residential properties'. In fact, the area bounded by Derby Road, Gregory Street and the Lenton Gardens Estate/Arnesby Road includes a significant number of detached, as well as semi-detached properties, and the only 'terraced' properties are in fact a small group of townhouses immediately opposite the Three Wheatsheaves public house. The applicants have also, conveniently, ignored the William Woodsend Homes next to Fanum House on the corner of Triumph Road and Derby Road (though they do refer to Fanum House itself, as well as Lenton Lodge – both, along with the Three Wheatsheaves, the William Woodsend Homes and the Rose & Crown public house considered by Nottingham City Council to be sufficiently important parts of the local street scene to be protected as part of the Jubilee Campus Master Plan – elsewhere in their application) and to the substantial residential properties located on Hillside and on both sides of Derby Road from Hillside to the QMC roundabout.

It remains our contention that, as it stands, the design, and the massing, especially the extension of the frontage well beyond that of the existing building at the corner of Radmarsh Road and Derby Road, continue to be unsympathetic to the street scene on Derby Road, and therefore, since Derby Road is a major route into and out of the city centre, do not enhance the positive impact that should be present on this gateway into Nottingham. Probably the most succinct and highly relevant response to the design was that of local residents who labelled the development as 'another Cell Block H'. Therefore, the question Nottingham City Council needs to ask itself is whether it is content to endorse this Cell Block H development or whether it is prepared to insist on a design which is sympathetic to the local street scene, exhibits a standard of design that adds value, and provides a significant and lasting contribution to its predominantly residential and parkland surrounds?

An additional point to make is the fact that not only does the Unite application do little more than pay lip service to the 'mixed-use' designation of that site, but it has nothing within its design to provide the flexibility of long-term use which might have enabled it to respond in a useful manner to future changing needs.

In summary, the Unite application is an 'oven ready' proposal designed to exploit a ready market in an area which does not need more student accommodation to exacerbate the already substantial over-concentration of students and the stress this has placed on local permanent residents and their amenity and social needs. With little or no likelihood that it will lessen pressure on local 'family housing' and enable, let alone hasten, the return of HMOs (C4 and sui generis) in the locality to C3 use, it furthermore does nothing to remedy Nottingham's need to provide good quality housing which will help to retain the educated workforce that the city looks to the universities to provide it with.

As we did previously, the Nottingham Action Group on HMOs urges Nottingham City Council to reject this application outright.

**Nottingham Action Group on HMOs  
16 November 2020**

**Appendix:  
Comments by the Nottingham Action Group on HMOs (NAG) Submitted on 8  
April 2020 on Planning Application 20/00141/PFUL3: 406 & 408 Derby  
Road, and Radmarsh Road,**

This application by the Unite Group plc proposes to retain a car showroom garage ('Jaguar'), along with demolition of the remaining buildings ('Inchcape/Toyota') and subsequent redevelopment of the site for student accommodation (690 bed spaces) along with Use Classes B1 and D1 floor space fronting Derby Road.

**The Principle of PBSA**

Although the NAG continues to support the principle of purpose built student accommodation (PBSA) as a part of the toolkit needed to address the widely and well-documented problems that result from studentification, we qualify that support by saying that PBSA is only one part of that toolkit, and is not a solution in itself. It is only a useful part of that toolkit if it can be shown that it not only provides student accommodation, but that it unequivocally satisfies a number of additional criteria (critically important when the site is in and/or adjacent to highly sensitive neighbourhoods viewed by landlords, agents and students themselves to be 'student areas'):

- 1.(a) The location and size of the site preclude its potential for uses other than PBSA.
- 1.(b) No other suitable locations available.
- 2.(a) The proposed PBSA must be demonstrated to protect further conversions of C3 dwellings into C4 and sui generis student accommodation in those neighbourhoods where student concentrations already exceed the threshold level/tipping point of 10% above which they are considered to be no longer balanced and sustainable, or are seen to be in danger of exceeding that threshold.
- 2.(b) The proposed PBSA must reduce the demand by students for accommodation in HMOs as evidenced by data showing that substantial numbers of student-occupied HMOs (C4 and sui generis) are returning to C3 use, i.e. that the PBSA is not merely providing accommodation for increasing numbers of first-year students. This is critical in neighbourhoods which fall into the category outlined in 2.(a).

3. It must not exacerbate problems associated with studentification in surrounding neighbourhoods.

4. The design, materials and massing of the PBSA must sympathetically reflect the design, materials and massing of buildings in the neighbourhood and be sensitive to the nature and strategic position of the site with respect to the local street scene.

5. In addition to Point 4, the design of the PBSA must reflect the need to enhance the 'student experience'. That is, it must not only provide communal space within each unit, but be designed to encourage individuals and different groups of students to socialise with a mix of students reading different subjects, from different socio-economic groups, different nationalities and cultures, etc. In other words, it is essential that the way in which the different elements of the PBSA are designed and constructed must (i) counter-act the danger of ghettoisation with the residents having little or no experience of the world outside the immediate interactions and requirements of the courses they are following; (ii) provide for the mental as well as physical welfare of the residents and broaden their experience of 'adult' life and responsibilities.

6. The design and construction of the PBSA must be versatile and be readily seen to be capable of conversion to another use which, dependent on the location, should aim to be in Use Class C3.

It is against these criteria that the NAG has considered the application by the Unite Group plc. and makes the following comments.

### **Analysis of the Unite Application**

The NAG considers that in the first instance it is essential to view this application in the context of the immediate area as a whole, by and large, identified in the Jubilee Campus Development Brief as Quarter 4 or the 'mixed use' area, and, in doing so, to examine existing development and that for which recent planning permission has been given, i.e.

- An existing Unite plc development providing student 484 bed spaces (Riverside Point);
- A Church Lukas/Omni (19/02325/PFUL3) development with planning permission for 222 student bed spaces;
- A site on Triumph Road, which, although not within the 'mixed use' area as such, but which is contiguous with it, and has outline planning permission for 204 student bed spaces (19/02581/POUT).

The in situ Unite development (Riverside Point) and the Church Lukas/Omni development are located on approximately one-third of the mixed-use area in a strip between Radmarsh Road and the railway line running from Derby Road to the River Leen/boundary of the Jubilee Campus. As delineated in the Unite Design & Access Statement, the entire application site occupies the remaining two-thirds of the 'mixed use' area, of which more than half is proposed by Unite for redevelopment as PBSA.

### **Location**

**A. The Application Site.** The site is in an area within easy reach of major employers, the city centre, social spaces, schools, and has good access to local and national transport facilities. Although the Unite application includes retention of the Jaguar dealership for use as a car showroom, the remaining (major) part of the site is in fact a good sized plot and, even though the River Leen and flood risk place restraints on its redevelopment potential, it is arguable that it has considerable potential for sensitive and imaginative redevelopment for uses other than as PBSA, having potential to provide greater possibilities for new, long-term permanent skilled employment and/or good quality accommodation for new full-time households including precisely the graduate starter families which Nottingham is eager to retain within the city's boundaries. This is in contrast to, for example, the Church Lukas/Omni site on Radmarsh Road which is heavily impacted on by its location at the end of Radmarsh Road (in effect a

cul-de-sac) and physical (road, river, railway line, existing Unite development) as well as flood risk and other constraints.

**B. Alternative Sites.** Although, it can be argued that Nottingham University has, by and large, fulfilled a number of the aims of the Development Brief, the one area in which it has outstandingly and consistently failed to implement the Brief is the development of the north end of the Jubilee Campus as a 'student village', i.e. the Transco site, and that of the Imperial Tobacco Warehouse and its associated buildings. A recently approved application by Nottingham University (19/02650/PFUL3), in effect an extension of relatively small amount of existing student accommodation on the Jubilee Campus, will provide 280 bed spaces. However, by no stretch of the imagination does this development, welcome as it is, go more than a small way towards realising the potential of the northern end of the Jubilee Campus as the nucleus of a 'student village', with provision for a large amount of student accommodation and other ancillary facilities on land that is owned by Nottingham University, and in an area where the concentration of students in HMOs is significantly very much less than that in the neighbourhoods in Lenton, Dunkirk and Wollaton Park and Wollaton Park Estate.

The Unite application is clearly aimed at students attending Nottingham University and the proximity of the university to the application site makes it attractive to Unite to acquire and redevelop as PBSA. However, it is pertinent to point out that the university (and NTU whose students have an increasing presence in the Derby Road corridor in Lenton) is well connected to Nottingham's public transport system, and therefore sites along the NET route to Chilwell can also be considered to be potential alternatives for this PBSA, as indeed can be sites in the city centre area itself.

### **Balance & Sustainability**

The detrimental impact on residents (home-owners and tenants) and their neighbourhoods of wholesale conversion of 'family' homes into HMOs resulting from the expansion of student numbers has been well-documented. Nottingham City Council, in responding to what is generally now called 'studentification' has planning policies which seek to: (i) Identify areas in danger of becoming imbalanced because of the over-concentration of student households, and through adoption of an Article 4 Direction removing permitted development rights for conversions to HMOs, resist further conversions in these areas; (ii) divert students into PBSA thereby reducing demand for accommodation in HMOs resulting in the return of C4 and sui generis dwellings into C3 use thereby retaining or restoring balance and sustainability.

**C. Contribution of the Proposed PBSA to Protection of Residential Neighbourhoods in its Locality.** An increasing number of Local Authorities have either introduced Article 4 Directions removing permitted development rights from conversions to HMOs, or are in the process of doing so (see for example the list produced by the Residential Landlords Association: <https://news.rla.org.uk/local-government/article-4/>). It is relatively safe to assume that LAs would not commit scarce resources to setting up and managing Article 4 Directions if these were not seen to be effective in controlling concentrations of HMOs. Therefore, it is reasonably safe to state that in Nottingham it is the Article 4 Direction which is the effective tool protecting 'studentified' neighbourhoods from further conversions of dwellings to C4 and sui generis use as student accommodation. This supposition is further supported by the fact that before the Article 4 Direction came into effect in 2012, and despite the existence of planning policies concerning concentrations of student HMOs (e.g. the BBC SPD and the identification of at risk neighbourhoods through the tipping point/threshold concentration), there was little evidence that Nottingham City Council was able to exert any genuine control over the creation of HMOs in studentified neighbourhoods such as those in Lenton and Wollaton Park which are clearly in the hinterland of the present Unite application. This is demonstrably no longer the case. It may also be worth pointing out that, as a result of pressure from conversions to HMOs, residents and their elected representatives in Beeston are actively following the Article 4 Direction tool with respect to HMOs.

As a consequence the NAG argues that it is in fact the Article 4 Direction rather than, as is claimed, Unite's proposal to insert another 690 students into the area, which is the significant tool when it comes to protection of residential neighbourhoods in its locality from further conversion of 'family' homes into (student) HMOs.

**D. Contribution to Reduction in Demand for HMOs and Returning HMOs to C3 Use.** It is accepted that hitherto the provision of PBSA has reduced the demand for HMO accommodation in those neighbourhoods in Nottingham which, for a number of different reasons, have not proved to have long-term appeal to students. It may be that this has lessened the pressure by landlords and developers to convert dwellings to specifically student occupied HMOs in these areas. However, in neighbourhoods which students have come to see as being 'student areas', this is sadly not the case.

There is little, if any, strong evidence that, for example, the substantial amount of PBSA in and around the immediate centre of Nottingham has in any way reduced the demand beyond the first year for HMO accommodation in neighbourhoods such as the Arboretum area, Cromwell Street/Portland Road, the 1970's 'townhouse' estate on North Sherwood Street (Clinton Court, Matlock Court, Bluecoat Close, etc.). In fact, recent feedback from residents living in these neighbourhoods, albeit that it is anecdotal, very clearly indicates that there is a paucity of evidence to support the claim that PBSA is reducing the demand for student-occupied HMOs, and certainly no evidence that existing student-occupied HMOs are being converted back to 'family' use. Although it is difficult to make direct comparisons between neighbourhoods and so there is some room for discussion as to the validity of a comparison between these neighbourhoods and those in the Lenton-Wollaton Park areas, despite many differences, in the context of this set of comments, they are very similar, for example: they are in close proximity to the main campuses of Nottingham's universities; they are perceived by students to be 'student areas' rather than being home to sustainable, inclusive and mixed use communities; they are areas where there is over-concentration of student-occupied HMOs. Consequently, the NAG believes that it is valid to use the one to assess the probability in the other that, as is being claimed, the proposed Unite development will reduce demand by students (particularly returning students) for accommodation in HMOs with the result that a significant number of HMOs will return to C3 use.

From the Design & Access Statement, as well as from pre-application discussions with Unite representatives and their colleagues, it is obvious that a major argument underpinning the application concerns the beneficial impact on residential neighbourhoods in Lenton and the Wollaton Park area. In particular the highly attractive, and much promulgated, point that the development, if approved, will reduce the demand by students for accommodation in HMOs in these neighbourhoods and lead to a significant number of HMOs being returned to 'family' use.

This claim has to be looked at in relation to the fact that:

(i) the application site is within an area where, at over 40%, the average concentration of student-occupied HMOs is significantly higher than the 10% tipping point mentioned in 2.(a). Indeed there are neighbourhoods within the area where the concentration of student-occupied HMOs is approaching, if not exceeding, 90%. Under these circumstances, there can be no doubt that an over-concentration of students is already in existence. Neither can there be any doubt that the recently approved applications will approximately double the number of student bed spaces in PBSA in the immediate area, i.e. from 484 to 910. If the Unite proposals are accepted, then the number of student bed spaces will rise to 1600, adding a significant number of extra student households to the area not only and exacerbating the acknowledged imbalance, but further entrenching the view that Lenton, in particular, is already an established 'student village';

(ii) if a university's first year intake increases by, say, 500, then over the period of a typical three-year undergraduate course, the additional requirements for bed spaces will be around 1500;

(iii) the continuing and substantial increase in student numbers in Nottingham, has been maintained, even against the background of a continuing trough in the 18-year old demographic in the country as a whole. If, the projected upturn in this demographic is factored in, then it is reasonable to anticipate that student numbers at both of Nottingham's universities will exceed the levels forecast in the Knight Frank Demand Study attached to this application.

Whilst the latter observation (iii) points to the need for more student accommodation in Nottingham (which can be taken to mean more PBSA) what must also be taken into account is the fact that, unless it is a requirement for students to remain in PBSA beyond their first year (which is not only unlikely, but morally and socially unacceptable in this country), then the established routine is for students to look for accommodation in HMOs, and, more often than not, in HMOs in close proximity to their first year accommodation, i.e. in neighbourhoods they see as being familiar, and, of course, neighbourhoods which they have come to see as 'student areas'. As long as students continue to form groups with friends with locational preferences, Lenton in particular, with its park, shops, bars, etc. will retain a strong magnet for students and their accommodation preferences.

As it stands, these considerations, when coupled to the paucity of evidence that, under more favourable circumstances, PBSA has reduced the demand for HMOs in 'hot spot' areas, mean that the NAG, very regrettable, has to dismiss this much quoted aspect of the Unite application, and add that to promote it to local residents, as has been done extensively, is at the very least misleading.

**E. Impact on Problems in Surrounding Neighbourhoods.** The concentration of students in neighbourhoods in and around the Derby Road corridor continues to have a detrimental, and well recorded and well-established impact on almost all aspects of the lives of residents living in them.

It is readily accepted that, provided the management regime established in a PBSA is fit for purpose and enforced, this type of student accommodation mitigates against some of the problems associated with HMOs, e.g. external and internal maintenance, refuse management and disposal, and, to great extent, noise from student activities in the curtilage of the PBSA. In this respect, the Unite proposal can be anticipated to have a beneficial effect on the residential neighbourhoods nearby, at least so far as exacerbating these problems is concerned. However, we need to highlight at least some of the problems that PBSA is not likely to ease.

- **Late night on-street noise.** It is evident that residents in PBSA, like their counterparts living in HMOs, are able to take advantage of Nottingham's vibrant entertainment venues. In the context of the Unite application site, there is more than ample evidence that students returning along the Derby Road corridor from the city centre to their accommodation late at night and into the early morning are responsible for a considerable amount of distress caused to residents and their families by disturbed sleep. So, it is reasonable to suppose that locating 690 more students on the Derby Road corridor will exacerbate this particular problem.
- **Over-crowded pavements.** One of the less commonly reported problems, but particularly pertinent to the Unite application, is connected to the sheer volume of students (pedestrians and, unfortunately, cyclists as well) and, for want of a better description, the competition, especially at specific times of the day, between them and other users, e.g. local residents and, in the vicinity of the QMC, patients and visitors. Local residents in this area report that they regularly encounter difficulty in walking along the pavements without being jostled and, on occasion, forced into the road by students in groups (who seem to adopt the principle that might is right) and on cycles.

Again, it is not unreasonable to anticipate that locating 690 more students on the Derby Road corridor will aggravate an already existing situation. (Note: When this problem was fed back to Unite's representatives at pre-application meetings and the consultation event at the Scout Hut, the response given was that the pavements need to be widened!)

- **Parking & Traffic.** This is a particularly sensitive issue for local residents. Whilst the provision of parking spaces in PBSA is very limited, and whilst the managers of PBSA can require, as part of the tenancy agreement, that students do not bring cars with them, there continue to be concerns about how well these agreements are policed and, consequently, what the impact on the local area is likely to be. On-street parking restrictions are already in place in a good part of the general area where the Unite application site is located. In part these are in place to deal with the impact of limited parking facilities at the QMC, but also with that of students.

Especially concerning are the arrangements that PBSA managers put in place to deal with students' arrival at the beginning of an academic year and at the end. The Planning Statement prepared by ROK (Section 6.35 and amplified in Section 6.113) states that '... appropriate ... car drop off/pick up arrangements' will be provided. It has to be remembered that the number of students expected to arrive at the in situ PBSA and in that approved more recently, along with the project 690 in this application will total around 1600, and that they will arrive in within a very narrow time frame. In addition, Derby Road is a main arterial route in and out of the city centre. It is always extremely busy and traffic issues are commonplace: it does not take very much deviation from the 'norm' to result in gridlock. This raises serious worries about the suitability of the location for PBSA as well as the actual number of bed spaces postulated in the application; worries which are not lessened by statements that show a distinct lack of familiarity with the area, e.g. that public car parks are available within five minutes of the site for longer-term parking post drop-off. This particular statement calls into question whether what Unite really means is that it is acceptable for students to bring cars so long as they park them somewhere that Unite does not have to deal with.

- **Retail and other community provision.** A consequence of a highly transient, socio-economically and demographically uniform dominant population, such as is evident in Lenton is that local facilities become skewed towards providing for the requirements and preferences of that population, i.e. in this instance, students. It is impossible to envisage that the addition of another 690 students in the area will do anything other than to further encourage this skewing to the detriment of residents and their families. There is already a concentration of take-aways in the vicinity of the application site and elsewhere in the Lenton area.

### **The Proposed Building**

Before we consider the design, materials and massing of presented in the application documentation we will make some comments on the community consultation aspect of the Statement of Community Engagement and the conclusions drawn from it.

**Consultation Event Area.** On p.7 the document states that invitations were sent to 2,410 nearby residents and businesses and shows the area covered by this exercise. It is interesting that, with the exception of the Jubilee Campus itself, the remainder of the area is precisely that in which there is an over-concentration of student-occupied HMOs. Therefore, there is a reasonable expectation that by far the largest number of invitations were delivered to student-occupied properties and, since students by and large do not involve themselves in consultations about local matters, were ignored. However, on p.16 of the document, the consultants conclude that: *'Only 3% of those addresses that received an invitation attended the consultation event. This figure suggests that local residents were broadly comfortable with the redevelopment of the site.'* A 3% attendance is not surprising, especially given what we have



already said about the student concentration. However, what is surprising and completely invalid is the conclusion that this low attendance somehow provides tacit support for the proposals which have materialised in this application.

**Feedback & Conclusions:** It cannot be ignored that the validity of conclusions that are drawn from feedback to any consultation is highly dependent on the questions being asked, the way in which information is presented, the size of the sample: also important is the way in which the analysis of the results of the consultation are presented.

The four questions with straightforward yes/no/unsure answers were:

- Q.1 – In principle are you in favour of the principle of redeveloping this site?
- Q.2 – In principle are you in favour of providing greater access to (the) Jubilee Campus and creation of open space?
- Q.3 – Do you support the design principles?
- Q.4 – Are there any direct community needs for the civic building?

It would have been surprising to say the least if the answers to Q.1 and Q.2 had not resulted in strong support: as a rule people tend to favour redevelopment of a site if the alternative is a derelict building or piece of land; and if, as has been done here, the greater access to the Jubilee Campus is equated with the creation of open space, it is unlikely in the extreme that all but a minority of people will not support the notion. The response to Q.3 is of more interest since, according to the analysis, although just over half (54%) of the people who responded supported the design principles, the remainder were either opposed or were unsure. Similarly, the feedback to Q.4 indicated that whereas 40% of respondents felt that there is a need for the 'civic' building, the remainder did not feel there was a need or were unsure. (Note: on p.14 the document states that *'A multi-use facility ... providing 1751 m<sup>2</sup> of flexible B1 and D1 floor space. The university has expressed an interest in the space (subject to governance), which would assist with the expansion of the Jubilee Campus and provide a range of opportunities.'* Since no clear ideas, let alone concrete proposals were forthcoming from Unite during the pre-application stage, and do not appear to be part of the full application, it is really difficult to do anything other than query what is meant by 'civic' building and to conclude that perhaps the term is merely in place to tick boxes and enhance the acceptability of the application.

The final part of the public consultation feedback (Q.5) asked for additional comments. Here, using the methodology apparently adopted by the consultants, 71% of respondents made negative comments about the proposals, the remainder either making positive or neutral comments/suggestions. Of the 71% negative comments, 52% highlighted that there are too many students in the area. The consultants concluded (on p.15) that: *'It is clear that some residents are worried that there are already too many students in Lenton and that the local community has changed. Unite is satisfying a need in the area for additional student accommodation, as identified in the Demand Assessment. It is unfortunate for those who feel this is detrimental to the area.'* That this comment is contained in a document which forms part of the Unite application, allied to the amateur nature of the consultant event, the bias displayed by the questions asked and in the analysis presented of the results, goes a long way towards negating the supposed open, informed and positive nature of the consultation, and clearly invalidates the whole exercise.

**F. Design, Materials and Massing.** We preface this section of the analysis of the Unite application first by saying that it is difficult for residents who have to rely on glossy presentations, overblown descriptions and, as in some instances associated with this application, pictorial representations of places with no relevance to the application site, to visualise the way in which a development will look. Second, the NAG accepts that the car showrooms do not contribute to the potential of this area with respect to its prominent position on Derby Road, in itself arguably the most attractive route into the centre of Nottingham, They do not dominate the residential homes opposite them. They do not dwarf other buildings which

are so much an accepted part of the local street scene, and which, as acknowledged by the Jubilee Campus Brief, are sufficiently important architecturally and historically to be preserved intact: the Three Wheatsheaves Public House, Fanum House, the Woodsend Almshouses, the Rose & Crown Public House and Lenton Lodge. In other words. They unobtrusively serve the purpose for which they are being used.

Particularly relevant to the Unite application and its impact on the Derby Road street scene are the height, materials and massing of the buildings in the area. With the exception of the William Crane bungalows in the Wollaton Park Estate, these are predominantly two-storey, brick-built with pitched roofs, and, no doubt because of the organic development of the area over a long period of time reflects different taste and styles, with not only a surprising variation in fenestration and design features, but also (with some exceptions) an open structure and grain more usually associated with suburban rather than urban/industrial locations. As such, they are very much in sympathy with the close proximity of Wollaton Park, Highfields Park, University Park and, of course, the post-industrial re-development of the Jubilee Campus with its very clear parkland emphasis.

The proposed design appears to have managed to avoid heavy reliance on cladding and, by using brick as its main material, does in fact go some way towards respecting the Derby Road street scene. However, it is singularly unfortunate that the part of the development fronting on to Derby Road (the so called 'civic building') and, as such, the part of the scheme that will have the most impact on the street scene, is, at three storeys, far too high, and is a boring, bulky block with no interesting fenestration, variation along its length and its skyline. Not what is hoped for in a building which is supposedly an improvement on the one it is intended to replace. Its dislocation from the local street scene is very clearly shown in the illustration on the front page of Part 1 of the Design and Access Statement. Unfortunately, that illustration also shows that the uninspiring and pedestrian nature of the design continues in the other blocks, where the massing merely accentuates the bulk and warehouse-like feel of the whole development. In fact, one of the most used comparisons made by residents is to a prison. ('Cell Block H' has been often referred to.)

Of particular concern is the height of the blocks. It is unfortunate that, as the NAG suspected, the six-storey Church Lukas/Omni development on Radmarsh Road, in effect has set a precedent which this application is using. We point out that there is a significant difference between the location of the two developments: the Church Lukas/Omni building basically lies alongside Radmarsh Road and, as such, will have little visual impact when viewed from Derby Road. This is certainly not the case with the present proposal: to varying degrees all the blocks in the Unite development will have a strong visual impact on the street scene on Derby Road, as well as on Radmarsh Road itself, and of course on the Jubilee Campus itself.

Of particular concern to the NAG is that the six storey height at the back of the development, rather than open up the Jubilee Campus and the River Leen and extend the parkland nature of the campus to Derby Road, produces a visual and physical barrier which keeps the Jubilee Campus very much at a distance. It will not encourage the general public to take advantage of the access along the western side of the development to the 'Riverside Walk' and the open areas shown on the Illustrative Masterplan. In fact, since the car showroom presently occupied by Jaguar will remain, and bearing in mind the height and proximity of the western side of the development, plus the high metal fencing and the gated entrance, there is very little to attract the public to use the access to the River Leen. In fact it seems relatively evident that there is little other than paper attention to the 'wider community', with a focus is very much on students and student access to these features.

As important as the materials and massing are, the planting in and around the site are also important as they should be designed to provide relief from the presence of accommodation blocks. There are some aspects of the planting typology which, if they are successfully implemented and maintained, will be a very welcome improvement on what is on the site now.

Particularly welcome is the inclusion on the west side of the River Leen of an area of native shrub planting. However, and we do appreciate the horticultural challenges presented by the site, it is regrettable that so many of the trees, particularly those that will be visible from Derby Road, as fine as they undoubtedly will be, are not native to this country. Neither are they associated with attractive displays of blossom or (with the notable exception of the birches) the winter displays afforded by their bark. Although details are not given about the planting in the courtyards, it is to be hoped that, again, there will be emphasis on plants which are attractive to bees and other insects, as well as being capable of thriving in difficult locations. Some attention would also be welcome to attracting birds, and even bats, to the area with the provision of, for example, nesting boxes.

The final comment in this part of the NAG response to the application is that, as Unite and colleagues were told on more than one occasion, the design, materials and especially the massing would not be out of place in parts of the city centre and along the NET route, for example, but that they have no place whatsoever in a predominantly residential-cum-parkland setting. It is regrettable that the Design Review Panel has not recognised this and is, in effect, endorsing a development where the pedestrian design and the massing will be doing nothing to enhance the local identity, and are so obviously detrimental to the character and appearance of a significant location on a major and very attractive arterial route into Nottingham.

**G. The Student Experience.** Although there has been some consideration given to the provision of PBSA for postgraduate students (e.g. Graystacks/Castle Boulevard), the overwhelming demand for this type of accommodation is by UK domiciled full-time students (predominantly first-year undergraduates), although PBSA is also attractive to overseas students. Section 4.2 of the Knight Frank Nottingham Demand Study presents an analysis of the satisfaction of students with PBSA and their preferences. The 2019 Knight Frank/UCAS Student Accommodation Survey shows that in Nottingham the level of satisfaction with PBSA is 89% compared to 87% for students living in the private rented sector. Also, the survey reports that when looking specifically at property types across the UK, those students living in cluster flats, or in shared houses (HMOs) reported that they were happier than those living in single-occupancy studio apartments, or alone.

It is worth commenting on these data at this point since they have a fundamental bearing on the validity of the argument put forward in the Unite application that the PBSA on Derby Road will reduce local demand for accommodation in HMOs, something that residents believe is crucial if there is any hope of realising the ambition to restore balance and sustainability and community cohesion to their neighbourhoods. The differences in the numbers highlighted are barely significant. Also, it is not surprising that, with some exceptions, students are happier in groups rather than living alone. What is not evident from the data is that students will willingly want to occupy PBSA beyond their first year, especially if the friends they have made in the first year, particularly those on the same study courses or who share similar interests, decide to move out of PBSA and into an HMO (with a lower rental and with what is perceived to be more freedom): in this instance more than likely an HMO in the immediate area, i.e. Lenton.

The Unite design is fundamentally identical to the majority of the PBSA that was already in place 20 years ago. There are improvements, but the question is whether they are significant enough to provide first-year UK students with an experience that overcomes the institutional nature of PBSA, the substantial rental differences, and the appeal of the 'freedom' of living in HMOs. On the ground experience shows that, by and large, returning students have a clear social and financial preference for living in groups in student 'homes' as opposed to cluster flats or Halls of Residence. Therefore, as long as there is an increasing supply of first year undergraduate students (which is likely if only because we are now at the beginning of a demographic upturn in that cohort) and as long as there is no requirement for them to remain in PBSA/Halls of Residence when they return at the beginning of their second and subsequent

years, the PBSA proposed in the Unite application will of course contribute towards the requirement for first-year undergraduate accommodation.

Whether its design will fulfil the conditions the NAG put forward in its initial Point 5 (i.e. encourage individuals and different groups of students to socialise with a mix of students reading different subjects, from different socio-economic groups, different nationalities and cultures, etc. In other words (i) counter-act the danger of ghettoisation with the residents having little or no experience of the world outside the immediate interactions and requirements of the courses they are following; (ii) provide for the mental as well as physical welfare of the residents and broaden their experience of 'adult' life and responsibilities) is debatable.

**H. Adaptability.** Although the application claims that the design means that the buildings can be rejigged to provide apartments for non-student residents, it is difficult to visualise this

### **Further Remarks**

We begin by referring to the comments made by Council David Trimble when the Planning Committee discussed the Church Lukas/Omni application (19/02325/PFUL3) since they are even more relevant now. We support them, we reiterate them:

(i) The student population in the City is concentrated heavily in the Lenton area, and this leads to significant issues for the local communities. Students can create a great deal of noise and disruption late at night and early in the morning. The Council's Anti-Social Behaviour team is in the area frequently and 1353 Community Protection Notices were issued in the last year, with 1124 street alcohol confiscations carried out – with most incidents occurring in a very narrow period of time;

(ii) In addition to problems in the street, anti-social student behaviour can also lead to problems on the buses [and on the NET system], and night-time disturbance for local pupils at the neighbourhood schools – particularly during examination periods. Increasing student numbers exacerbates the existing shortage of street parking for other residents – although students are not allowed to bring private cars to their accommodation, they do so and there is nothing to prevent them;

(iii) The student population in Lenton is already high, but more developments are in the pipeline for further student accommodation in the area. The existing level has already created a significant community imbalance and is detrimental to local residential communities, who oppose the construction of additional student accommodation in their area.

We also remark that this application on this site has highlighted a contradiction between different, but relevant, Nottingham City Council planning policies. Policy HO6 states that in assessing the impact of a development on local objectives to create or maintain sustainable, inclusive and mixed communities, regard will be given to the existing proportion of HMOs and/or other student households and whether the proportion of existing and proposed development amounts to a significant concentration. However, it qualifies this by excluding from the assessment PBSA in areas identified in Policy HO5, which include university campuses. In this case, the proposed development will undermine the local objectives to create or maintain sustainable, inclusive and mixed communities even though it is technically (since it is not owned by Nottingham University) within the area which the Jubilee Campus Development Brief identifies as being within the extended campus boundary.

In addition, we express concerns about the Council's strategic approach to provision of student accommodation in the city. There is no argument that the trend for both universities to increase their student intakes has continued to grow and that the provision of new PBSA (predominantly by private developers and investors) has barely kept up with the demand, predominantly by first year students and some overseas student. So, it would be foolish to say that there is no need for more PBSA. However, what has to be questioned is whether this strategic approach is viable in a set of circumstances where, regardless of the location of the PBSA, additional

supply of bed spaces is continually negated by the increase in student population, bearing in mind the rule of thumb calculation that every additional first year undergraduate student will mean that over the period of their degree course they will require the provision of three bed spaces. It does very much appear that the Council's primary concern is to provide ever increasing amounts of student accommodation in PBSA, even if that accommodation, when unsuitably located, further exacerbates existing over-concentrations of students, reinforces imbalance, loss of community facilities, loss of community cohesion in areas like Lenton, and does nothing to return HMOs to family use.

We note that, although a recent Planning Appeal decision at 3 Triumph Road casts doubt on the designation in the Development Brief of the application site for 'mixed use', and clearly Inspectorate decisions carry significant weight, it is a well-established fact that these decisions do vary and that, in addition, the decision on 3 Triumph Road was made before the Planning Committee approved the Church Lukas/Omni development, and before the Unite application was submitted.

Unfortunately, we also feel that we must draw attention to the background to this application.

Unipol and the NAG facilitated a U-NAG open meeting on 21 February 2019, the notes of which are available on request and also on the NAG website (<http://www.nottinghamaction.org.uk>). At that meeting Paul Seddon, Nottingham City Council Director of Planning & Regeneration, responding to questions about purpose built accommodation suggested, for the first time, that, in relation to Lenton, there was a case for locating purpose built student accommodation (PBSA) [in Lenton] in order for it to be attractive to Nottingham University students, with clear reference to the site on Derby Road designated as part of a 'mixed use' area in the Jubilee Campus Development Brief of 2004. At the same time it was pointed out that, because of excellent public transport links, the area around Nottingham Station [and along the NET Line 2 via the QMC to Beeston and Chilwell] was a possible/preferable location.

According to documentation submitted by Unite as part of this application, representatives from Unite had met with Nottingham City Council's planning officers shortly before the meeting to discuss a proposal to locate PBSA on the site. It needs to be pointed out that, prior to the U-NAG meeting, no mention had been made to representatives of the NAG, or indeed any of the local residents' associations despite relatively regular contact between these groups and Nottingham City Council's Planning Department, of any intention to develop PBSA on this site. The first intimation of Unite's intentions was contained in an e-mail dated 7 July 2019 seeking a meeting with local 'key stakeholders' on 31 July 2019. On 12 August 2019. The Nottingham Post reported on plans by Unite to build a new 620-bed development of land on Derby Road occupied by the Jaguar-Lexus/Toyota car showrooms.

We cannot emphasise enough that was made abundantly and unequivocally clear to Unite's representatives at pre-application meetings with representatives from local residents' associations and the NAG, and during Unite's consultation drop-in that this application is not supported by far and away the majority of residents. This has also been made abundantly clear to Nottingham City Council's Planning Department, which was represented at the pre-application meetings mentioned above, as well as at a public meeting in February 2020 arranged by Lenton & Wollaton East Ward councillors. It is also abundantly clear from the documentation presented with the application that Unite has fundamentally ignored the concerns of residents both in respect of the principle of what is being proposed, and in the design, massing and materials put forward. In other words, the 'consultation' process has been merely yet another box-ticking exercise and, therefore, a sham – and a shame.

**[Note:** The measures introduced by the Covid-19 pandemic prevented a further residents' meeting, facilitated by the NAG, the Lenton Drives & Neighbours RA and the Wollaton Park RA, from taking place in March 2020, meaning that residents have not been able to discuss in detail the specifics of the Unite application, the questionable validity of the basis on which the

application is founded, and its potential implications for residents living in neighbourhoods in Lenton & Wollaton East Ward.]

### **Conclusion**

We reiterate that the NAG continues to support the principle of purpose built student accommodation as a part of the toolkit needed to address the problems that result from studentification. But, PBSA is only a part of that toolkit and, as long as Nottingham's universities continue to expand their student numbers and continue to rely on Nottingham to supply more and more accommodation for those students, PBSA can never be a solution in itself.

That having been said, we are mindful of, and do not contest, the benefits that the universities bring to Nottingham. However, these must always be weighed against their negative impact on the neighbourhoods which host their students, their role in the continuing loss of good quality family housing, the demands put on increasingly limited Council and Police resources, the loss of Council Tax revenue, as well as on the wisdom of the increasing reliance of the city on the universities, their business and their spin-offs.

In dealing with this application, the NAG has sought to analyse some 70+ documents and to distil their contents in such a way that we are able to at least try and come to a sensible and logical conclusion.

We have measured the application against the six criteria listed at the beginning of this document and we have concluded that the application fails to satisfy even one of them. Therefore, we have no hesitation in opposing this application in its entirety, and in the belief that, in doing so, we reflect the views of the overwhelming majority of residents who live in Lenton and in the Wollaton Park/Wollaton Park Estate area.

We urge Nottingham City Council to dismiss this application in its entirety.

**Nottingham Action Group on HMOs  
8 April 2020**