

**PROOF OF EVIDENCE ON BEHALF OF STAFFORD BOROUGH
COUNCIL**

Councillor Frances Beatty MBE, JP, ARAGs

Planning Appeal Reference: APP/Y3425/W/23/3315258

**Stafford Borough Council Application Reference:
22/35765/FUL**

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

**Site: Former University Halls of Residence, Stafford Education
and Enterprise Park, Weston Road, Stafford**

Date: 17 April 2023

I Frances Beatty will say as follows:-

1. I was first elected as a Councillor of Stafford Borough Council in 2007 I am the Council's Cabinet Member for Economic Development and Planning, and a member of the Council's current Planning Committee since May 2022 and served on the previous Planning Committee prior to that.

Background

2. This is my proof of evidence for the Inquiry set up for the planning appeal submitted by Serco Limited under section 78 of the Town and Country Planning Act 1990 in respect of the local planning authority's decision to refuse permission for a planning application for change of use from student accommodation to asylum seeker accommodation ("the proposed development") at the Former University Halls Of Residence Stafford Education And Enterprise Park Weston Road, Stafford ("the Appeal Site").
3. The Appeal Site comprises purpose-built student accommodation located to the south of Weston Road (A518), around 2km from the centre of Stafford.
4. Serco Limited did not do enough to consult local residents prior to submitting the planning application. They sent leaflets about the proposed planning application to the nearest residents. I received a leaflet and a copy of this and the accompanying covering letter is at **Appendix 1**. While the leaflet contains telephone numbers and email addresses to allow residents to contact Serco for further information, it was not possible to contact them in this way. I tried to contact Serco by email many times and was trying to call them twice weekly. I didn't get a reply from Serco - they were completely uncommunicative.
5. The planning application was considered by the Council's planning committee on 27th July 2022. Members reviewed the case for the proposals and the material planning considerations applying and refused the planning application for the following reason: "The proposal, due to its nature and scale, is considered to result in a lack of social inclusivity in the community and would increase the public fear of crime. The proposal, due to its nature, is also considered to be sited in an inappropriate location in close proximity to schools, which results in an increased public fear of crime. The proposal is therefore contrary to Paragraphs 92 and 130 of the National Planning Policy Framework

(2021). Additionally, the application fails to demonstrate that the proposal would not lead to a detrimental impact upon local public health service resources”.

6. I was present at the Planning Committee meeting on 27 July 2022. As I had called in the application, I did not participate or vote on the application as a member of Planning Committee. I had called the application in to the Planning Committee for the following reasons -

- “- Scale - concentration of refugees in one place
- Location - community concerns of risk of social tension
- Pressure on public services - the capacity of local health, education, police and other support services
- Permanent loss of the training support facilities because of change of use, at a time when learning and training provision is growing exponentially in Stafford - with the Learning Town ambitions, presence of three universities, international research of the new Health and Innovation Centre, invaluable expanding tertiary educational role of the town - we must not undermine its potential
- The permission is applied for until 2029, having changed the use of the site what are the plans thereafter? This aspect would need strict conditions applied. -

Inaccuracies 1) the argument is made that the impact of this influx of people will not have a detrimental impact on the surrounding areas as there will be less asylum seekers than students previously. There have been almost no students housed in the buildings for the last several years, during which two major surrounding residential developments have been built. 2) The complex is described as in the open countryside - it is not. 3) Part of the application states families may be housed, later that they will not.”

7. The local planning authority is defending the planning appeal on the basis of two grounds -
- (i) the lack of social inclusivity and public fear of crime arising from the nature and scale of the proposals including its location close to schools;
 - (ii) The appellant’s failure to demonstrate that the impact of the proposals upon local public health service resources will be acceptable.

Fear of Crime

8. Residents have expressed to me their strong concerns that the planning application seeks to accommodate nearly 500 asylum seekers, likely to include a large proportion of adult men, so close to local schools. This is too dense a concentration of destitute asylum seekers in one location. A large number of people with nothing to do, housed next to a Primary and Secondary School accommodating nearly 1400 children, surrounded by part of the MOD Site - on which are very recently built housing developments. **Appendix 2** is a plan identifying the location of the appeal site, along with the adjoining housing to the south.
9. Parents are understandably anxious that the way of life of every child in the area will be affected, going to school or at play. I consider that it is likely that the parks near the application site may attract groups of asylum seekers who may be doing nothing wrong, but as they will have very little to do, will congregate in public spaces.
10. The Police were consulted on the application and, in a response dated 19 April 2022, (CD B8) the Designing Out Crime Officer provided detailed comments, including various design solutions and built security measures. The Applicant subsequently declined the suggestion of additional built security measures. The long list of over ten police security recommendations has been completely ignored by the applicants. In the event of the appeal being allowed these should become conditions.
11. There were representatives from far-right groups in attendance at the Stafford Borough Council planning committee meeting of 27th July, including a group called Patriotic Alternative. Cards with the "Patriotic Alternative" logo on them were observed left behind after the meeting, on tables and outside the meeting room. **Appendix 3** is a scanned copy of one of these business cards that was collected and retained by a Council Officer.
12. On 11th March there was a clash between protestors calling on the Government to take a harder line on immigration and counter-protesters in nearby Cannock town centre and an article published by the Express and Star on Feb 4 2023 referred to police officers forming a barrier between the two protests and noting

that Staffordshire Police had earlier confirmed that one man had been arrested (see **Appendix 4**). Residents affected by the planning proposal are concerned that it will increase crime and disorder in the area due to protesters taking part in violent demonstrations.

Impact on Public Health Services

13. The UK government recognises increased risk of mental disorders among asylum seekers and refugees. There is an increased need to access health services, in particular mental health provision for people seeking asylum, recognising the high levels of mental health need and complex trauma among this group. In the government 'Mental health: migrant health guide'¹ (CD ref. G7) it is suggested that migrants 'may be at increased risk'. The WHO guidance for mental health promotion and care for refugees² (CD ref. G8) advocates eight priority action areas; including providing interpreters within services, clearer guidelines on healthcare entitlements, adequate training of mental health staff to work with these vulnerable groups. These areas are vital, considering the risk of mental disorders and complexity of barriers to care.
14. The only health care provision offered is a small room for examining 'Initial Accommodation' arrivals. The primary care service is expected to pick up the long-term 'Dispersed Provision' residents. The NHS Staffordshire and Stoke-on-Trent integrated Care Board consultee in a response dated 4 July 2022 (CD B3) says - There would be a demand upon primary healthcare as a health assessment would be required for every occupant alongside appropriate triage and care/treatment where necessary. The consultee advises that the position that there would be a 'net reduction' on the impact upon health services is incorrect and should not be attributed material weight. The fallback of the former student use is misguided as there is no existing demand/pressure from this premises on the health service and the access rate from the proposed occupiers would not be comparable to the current occupiers. Clarification is required to ensure that the physical space provided on site for healthcare provision is suitable for use and includes: easy clean surfaces, obscure glazed

¹ CD G7 Mental health: migrant health guide - Advice and guidance on the health needs of migrant patients for healthcare practitioners <https://www.gov.uk/guidance/mental-health-migrant-health-guide>

² CD G8 Mental health promotion and mental health care in refugees and migrants Technical guidance (2018) World Health Organization

windows or blinds, a sink, space large enough to contain a desk, couch, two chairs and storage. The NHS response also seeks clarity regarding the provision of transportation of occupants to healthcare providers and the nature of the onsite health support services and how this could be extended to the dispersed accommodation. None of this is answered in the application.

15. At paragraph 7.5 of the appellant's planning design and access statement (CD A2), Serco acknowledge that there will be some impacts of accommodating 481 asylum seekers on the site, such as the need to provide health care facilities for 310 of the DA residents, the use of public transport, parks and other local facilities. Ridiculously the appellant says in a response to the planning application dated 10 June 2022 (CD A17): *"Residents in dispersed accommodation will be signposted to appropriate GP provision. The existing use for students also required appropriate GP provision. This application reduces the overall requirement to only 310 people. Thus, the proposed development results in a net reduced impact on health services and also provides onsite floorspace for health care"*. This is completely disingenuous. How can they compare students to asylum seekers?
16. Asylum seekers include people exposed to war or some other sort of severe trauma, in need of social, mental and financial support. They may require specialist medical support. Local residents are concerned that the local services are already stretched and do not see how public health services can cope with a such a large local increase in demand.

Social Inclusivity

17. The planning application would be a disproportionate amount of asylum seekers to Stafford. At pages 5–7 of the of the appellant's planning design and access statement (CD A2), Serco have quoted published population figures for the Borough (134,200) and considered potential alternative sites in 5 major Midlands cities - Derby, Coventry, Birmingham, Wolverhampton and Leicester and suggested these cites accommodate a significant number of Asylum Seekers already. It is not fair or appropriate to compare Stafford's profile to that of five major UK cities. Stafford town has a 79,400 population.

18. It should be recognised that Stafford has welcomed and housed Syrian and Afghan refugees and in other parts of the County, we have welcomed both refugees and people seeking asylum. In addition 77 asylum seekers are being accommodated in a hotel in central Stafford, Bridgewood House, in Victoria Square.
19. The provision of large institutionalised style accommodation does not provide appropriate and adequate accommodation for asylum seekers. I refer to a report from the Refugee Survival Trust and Red Cross (CD G9)³: which states recent moves toward using larger scale institutional accommodation rather than community housing has had detrimental effects on people's ability to establish and maintain social connections, as well as on their mental health and general wellbeing. Asylum Matters also finds institutional accommodation is unsuitable for housing and causes serious harm⁴. In a joint report⁵ six organisations carried out research and interviews with many asylum seekers feeling unsafe and institutionalised. The report considers such facilities "substantially blur the line between freedom and detention", that they will "harm people seeking safety, and they will do so at substantial financial cost" and concludes "People should not be warehoused in institutional sites".
20. It is not for me to determine how the government treats asylum seekers while their claims are being decided, but it seems to me that the approach is to seek to provide a very basic form of accommodation and facilities, to restrict their ability to work and to limit their disposable income. But such an approach has consequences which give rise to considerations that need to be taken into account by the planning system.
21. In my opinion it is logical that:
 - a. If on-site facilities are basic and provide nothing meaningful to do, then there will be a natural desire to 'escape' from the facility for large parts of the day and evening.

³ How will we survive? Steps to preventing destitution in the asylum system (Oct. 2021) British Red Cross and Refugee Survival Trust

⁴ <https://asylummatters.org/2021/12/15/new-joint-report-in-a-place-like-prison-voices-from-institutional-asylum-accommodation/>

⁵ In a place like prison': voices from institutional asylum accommodation - Action Foundation December 2021

- b. If residents have virtually no money, they will be drawn to public places to 'hang around'. This will be intimidating to local people.
 - c. They may be tempted to beg for money or help to allow them to fund leisure activities.
 - d. They may well be preyed upon by local criminal gangs and encouraged to take part in criminal activity to earn money.

- 22. It is therefore essential that facilities be provided on-site to encourage the residents to stay on-site. From what I have read in respect of this proposal, nothing meaningful is to be provided. It does not appear to me that sufficient thought has been given about what the residents are actually going to do all day.

- 23. The current proposal is completely differed to housing students in halls of residence:
 - a. Students have a structure to their day – attending lectures, taking part in clubs and societies, and attending student social events during their free time.
 - b. Students are able to seek part-time jobs to earn money to fund their leisure activities.
 - c. Students are able to contribute to the local leisure and retail economies.
 - d. Students, have a choice of where to stay. If they do not wish to stay in halls of residence because they do not like the standard of accommodation or the communal living approach they can, if they so wish, seek alternative accommodation. The asylum seekers would not have that choice so are very different from the students who do.

- 24. If the government persists with its current policy approach for housing asylum seekers then it cannot sensibly locate such a large unit in a residential area. It needs to find sites away from families and schools.

Conclusion

- 25. This is a daft proposal:

- a. It is too large, and the routine and facilities provided to the residents are inadequate meaning they will spend a lot of their time away from the site hanging around.
- b. It is in the wrong place:
 - i. It is inevitable that this will give rise to legitimate local concerns.
 - ii. It is also inevitable that 'flash points' and public disorder will occur.
- c. It will inevitably place a strain on local police and health services.

Appendices:

Appendix 1 - Serco consultation letter and leaflet

Appendix 2 - Plan identifying the location of the appeal site, along with the adjoining housing to the south

Appendix 3 - Scanned image of card left at planning committee meeting

Appendix 4 - Express and Star press article dated 4 February 2023 concerning a protest in Cannock town centre