

Cheshire West and Chester Local Plan Part 2 Examination

Statement in relation to Matter 2

The Scale and Distribution of Development

Prepared by Nexus Planning on behalf of The University
of Chester (Representor ID: 718682)

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Issue 3 – Site Allocations

Q1) What is required in terms of new allocations for housing, employment, minerals and waste?

- 1.1 The University of Chester have no comments to make at this point in time.

Q2) How have existing commitments and other sources of development land been taken into account?

- 1.2 These comments build on those previously made on behalf of the University of Chester on the Cheshire West and Chester Local Plan Part Two ('LPP2') Land Allocations and Detailed Policies Publication Draft Consultation (November 2017) in January 2018.
- 1.3 The University consider that the full potential of all sources of development land for the expansion of the University have not been taken into account, with specific reference to:
- a. The Glenesk site, which is proposed for de-allocation through Map Change 38; and
 - b. The Kingsway site, which is only partly allocated under Policy CH4 in Map Change 126.
- 1.4 Background context is now provided to highlight the importance of the role and status of the University of Chester not only to the City itself, but the District as a whole.
- 1.5 The comments are made in the context of the University of Chester's Estate Strategy (2015-25) prepared in April 2015 and the 2012 University of Chester Development Framework. Both documents acknowledge the Parkgate Campus of the University as the key site in Chester and the Glenesk site as the principal opportunity for future planned expansion of the University Estate. The Kingsway site is identified as the primary academic home of the Faculty of Arts and Media.
- 1.6 Additionally, the University of Chester is a key stakeholder in the Cheshire West and Chester economy and community and this is reflected in the Local Plan Part One ('LPP1'), and notably Policy ECON1. Paragraph 2.25 of the LPP2 states: *'The University of Chester is a key educational establishment in Chester with dispersed facilities across the city centre and*

adjacent suburbs, and at campuses in Warrington and Shrewsbury. The university population is important to the creation and sustainability of safe communities across the city.'

Strategic Context

- 1.7 The Glenesk site at the Parkgate Road Campus has been a longstanding opportunity to expand the University's principal site in the City. The site was acquired by the University in April 2008 and has been allocated for the expansion of the University by the Council since the adoption of the Chester District Local Plan ('CDLP') Policy CF2 in 2006.
- 1.8 In a strategic policy context the expansion of the Parkgate Road Campus is consistent with local and national policy objectives for the growth of the Higher Education sector.
- 1.9 At a local level, the 2015-2025 Estates Strategy (April 2015) and The University of Chester Development Framework (2012) both form part of the Local Plan Part One evidence base and promote the expansion of the Parkgate Road Campus for educational use.
- 1.10 The Development Framework seeks to facilitate the continued growth of the University through the allocation of Glenesk specifically to meet the future educational requirements of the University at the Parkgate Road Campus, as land with longer term potential and aspirations which has been reserved in the City of Chester Local Plan for expansion land for the University.
- 1.11 The Estates Strategy confirms that Parkgate is a hub for university support services which do not exist elsewhere across the other campuses. In addition to substantial teaching accommodation, the site currently accommodates various university support services, including the main university library, sports facilities, student accommodation, a recently constructed ERDF-funded food sector research facility ('NowFood'), student support, welfare and pastoral services, and other administrative services. The Glenesk site is included in the Estates Strategy as a key component of the University's future expansion plans, in particular to expand the Life Sciences department at Parkgate and provide an element of 'future-proofing'. The Estates Strategy states:

'The development of this site represents a longer term strategic opportunity for the University and is an important asset whose future use will be determined by the balance of priorities between student residential accommodation and the general development of the University estate to support the diversification of the academic curriculum and the University's research interests.'

- 1.12 The LPP1 is therefore highly supportive of the long-term retention of the Glenesk site to facilitate the development of the Parkgate Road Campus. The University of Chester is regarded as a development opportunity under LPP1 Policy ECON1, which states: *'The Council will support initiatives and accessibility to further/higher education facilities in the borough including the University of Chester.'*

- 1.13 The LPP2 Preferred Approach (published in September 2016) included the Glenesk site in the draft Policy CH4 University of Chester, as a potential location for the expansion of the Parkgate campus:

'The "Glenesk" site, as identified on the policies map, is allocated for potential expansion of the teaching facilities on the Parkgate Campus. The site should be brought forward in a comprehensive manner in the context of a development brief for the site and a strategy for the Parkgate campus as a whole.'

- 1.14 Reference to the specific use of Glenesk to meet the development needs of the University is proposed for deletion from Policy CH4 in the LPP2 Publication Draft. However, it is still acknowledged in Policy CH4 that the Parkgate Road Campus is the primary location for the expansion of the University in the long term:

'The University's Parkgate campus will continue to be a focus for development which may include additional student, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities in suitable locations.'

- 1.15 At a national level, Higher Education is high on the Government's agenda. In the Chancellor's Autumn Statement in December 2013, it was announced that universities in England would be able to admit an extra 30,000 students in September 2014 allocated by quota based on current intakes. More significantly, it was also confirmed that the cap on the number of students England's universities could admit was to be lifted in 2015, enabling further

expansion of the sector. The Higher Education and Research Act was passed on 27th April 2017 and supports the Government's mission to boost access to good quality Higher Education in the UK. It affords legislative status to the policies within the Higher Education White Paper 'Success as a Knowledge Economy' (published in May 2016) which seek to simplify the regulatory landscape, in order to: 'drive up teaching standards overall; enhance the life chances of students; drive economic growth; and be a catalyst for social mobility.'

- 1.16 However, uncertainties around planning assumptions for universities and forecasting student intakes has occurred following the introduction of an open market in student recruitment as a result of these changes in government policy. Universities now require the ability to respond to opportunities for one-off capital funding and to thereby have the capacity to expand as needed. A new regulatory body, the Office for Students (OfS), was set up by the Higher Education and Research Act and is responsible for a wide range of regulatory and funding matters.¹
- 1.17 Funding for certain types of teaching is recurrent and can be 'planned' in this respect. Other OfS funding is 'non-recurrent', and comprises grants for capital projects, and funding for other development and regulatory initiatives and to support national facilities. These grants are announced as they are allocated, which may be at any time of the year. Capital funding helps higher education providers invest in their physical infrastructure so it remains fit for purpose and provides funding to support sustainability commitments and investment plans relating to teaching. Teaching capital grants help providers develop and improve their higher education infrastructure; for example, providers might use their grants to invest in high-quality buildings, equipment or information technology. Capital grants are made for (and have to be spent within) a specific financial year. So for 2018-19, providers will have to have completely spent their allocation by the end of March 2019. Such grants are, however, reducing as a proportion of universities' income, as government increasingly expects provision to be made from sources other than recurrent central funds.
- 1.18 Another key factor is the need for University's to be able to plan for projected future growth in student intake and capacity requirements. The Higher Education Policy Institute's (HEPI) figures and forecasts for student intake indicate that although there has been a dip in the

¹ *The Guide to funding 2018-19 How the Office for Students allocates money to higher education providers'* (OfS, 11 May 2018)

number of student-age individuals in recent years, this is projected to increase² and the University need to be able to respond to this anticipated demand.

- 1.19 A key driver is the proportion of the young population applying to higher education, which increased by 50 per cent between 2006 and 2016.³ The second key driver is the increased likelihood of an applicant being accepted, which increased by 12 per cent between 2010 and 2016.⁴ Demographic change is projected to amount to around 50,000 additional students by 2030 and if participation continues to increase in line with the long term rate, this will require about 350,000 additional places by 2030.⁵
- 1.20 In a strategic context therefore, there is strong support evident at both a local and national level for the ongoing development of Higher Education in Chester and the University's key site upon which it can expand is the main Parkgate Road Campus. However, Higher Education institutions require the agility to take advantage of funding opportunities where necessary to expand their facilities and teaching offer, thereby allowing them to attract higher student numbers in a competitive climate.

The Confirmed Expansion of the University of Chester

- 1.21 The University has expanded and refurbished certain aspects of its estate, including at the Parkgate Road Campus, in recent years. This expansion has in large part been facilitated by the opportunity to utilise existing, redundant, often former public sector assets which the University has taken advantage of. This represents a prudent approach to cost management, whilst making use of the existing accommodation, and allowing the University to extend its resources. This approach reflects the Government's emphasis on efficiency and effectiveness in Higher Education.
- 1.22 Key developments at the Parkgate Road Campus, since 2006 and following the completion of the Development Framework in 2012 have included:
- The new Best, Chritchley, Downes, Binks and Westminster buildings;
 - The Students' Union;

² *Demand for Higher Education to 2030*, Bahram Bekhradnia and Diana Beech (HEPI, Report 105)

³ As above

⁴ As above

⁵ As above

- The NOW Food Centre;
- Grosvenor House residential accommodation;
- All weather pitch and two hard surface tennis courts;
- Upgrading of the hockey all weather facility; and
- Refurbishment of the Price Tower.

1.23 These developments have meant that the Parkgate Road Campus site is effectively at capacity, with very limited scope for additional development. The Estates Strategy confirms this:

'It is readily apparent... that owing to the limited space on Campus, there are few opportunities for further new development on the Parkgate Road site without major interventions in the form of demolition.'

1.24 This is reaffirmed by the Council at Paragraph 2.26 of the LPP2 which states: *'The loss of green spaces within the site should be minimised and any loss must be considered against the benefits of development to the wider community.'* The LPP2 acknowledges that only green spaces including operational outdoor sports pitches remain and therefore, expansion land is essential.

1.25 Since the University made representations on the Publication Draft LLP2 in January 2018, planning permission has been granted on 27th February 2018 (APP/A0665/V/15/3013622) at Clifton Drive, Sealand Road for the development of up to 142 dwellings, on land including former University of Chester playing fields. This was granted subject to the implementation of a planning obligation to secure a Community Use Agreement for the use of certain playing pitch facilities under the current operation of the University of Chester.

1.26 Land at the Parkgate Road Campus is included in this legal agreement and comprises: a full-sized Artificial Grass Pitch (AGP) for hockey, a full-sized AGP for football and rugby, a 60 metre running track, changing accommodation and WC facilities and parking. This therefore represents a further change to the state of play at the Parkgate Road Campus since the publication of the Draft LPP2. Given that there are now restrictive covenants on certain areas of the site, it is even more essential that the Council identifies suitable additional expansion land.

- 1.27 There is little or no room for expansion within the existing site. The largest area of hardstanding within the site is used as the main car park and was identified in the Development Framework as a potential development site; however it now needs to be retained as other car park sites have been developed and the capacity of the site has increased. The site currently provides a total of 488 parking spaces for students and staff. The demand for car parking spaces by students and staff at the university already exceeds the number of spaces available, with users to spaces at approximately 6:1.
- 1.28 Other existing site purchases and operational developments by the University in Cheshire West and Chester since 2006 are as follows:
- Kingsway – a former High School, declared surplus by the Education Authority (Cheshire West and Chester) in 2007. The site is now home to the Faculty of Arts and Media;
 - Riverside – the former County Council Headquarters. The site is now home to the Faculty of Health and Social Care and the Faculty of Education and Children's Services, as well as a number of support functions;
 - Bache Hall – currently accommodates the embryonic Chester Medical School (though it is anticipated that it will not have the capacity to support this work in the long term);
 - Thornton Science Park – the former Shell UK Research and Development Facility which currently accommodates the Faculty of Science and Engineering; and
 - Queens Park – the former MOD property south the River Dee which accommodates the Faculty of Business and Management.
- 1.29 These developments have been to a significant degree, opportunistic, in the sense that there was scope for the University to expand its offer in line with Government policy for Higher Education whilst taking advantage of the planned disposal of sites by supportive, often public sector, partners at viable costs – costs in each case defined in large part by the particular constraints of the site.
- 1.30 Whilst these 'off-site' developments demonstrate to a degree the scope for multi-site operation, it must be stressed that this approach is only viable and logical for the University, in large part, due to the accommodation being already available on reasonable terms,

alongside the necessary Government funding. In these specific cases this off-sets the downside of multiple site operation which include:

- Added complexity and costs in site management
- Added complexity and costs in staff timetabling and management
- The need for students to travel back to Parkgate for core and pastoral services
- The need for duplication in site management, site security and other services

1.31 The University has therefore expanded significantly since 2006, when the Glenesk site was first allocated in the CDLP. This has not, however, diminished the role of the Glenesk site as the sole option to expand the existing Parkgate Road Campus site. It is not reasonable that the Council should rely on opportunity sites for the University to be able to expand in the future, and they should take reasonable steps to allocate appropriate sites for this purpose, as was the case via the CDLP.

1.32 Given the importance attached to the need to facilitate the expansion of the Parkgate Road Campus, the site was removed from the Green Belt to facilitate its allocation. CDLP Policy CF2 states:

'The land bounded by Parkgate Road, the Chester Western Bypass and the former Mickle Trafford/Shotton railway line and as shown on the Proposals Map, is removed from the Green Belt to cater for the expansion of the educational facilities at the University of Chester.'

1.33 The explanation to the Policy notes that the site was removed from the Green Belt 'to enable the University to expand'. The explanation continues: 'the site is allocated for educational facilities only; student accommodation would only be acceptable where it was ancillary to new educational buildings on the site.'

1.34 It is clearly important that the University has the ability to expand its main campus in the future as and when it requires, and that the Glenesk site remains available as a key asset of the University estate which is capable of being developed to fulfil requirements at a future date.

- 1.35 Within this context it is therefore imperative that the intended de-allocation of the Glenesk site proposed through Map Change 38 is reversed and the allocation of the site for educational purposes endures in the LPP2.

Justification for retaining the Glenesk site within the Parkgate Road Campus allocation

- 1.36 Our written response to Matter 8, which deals with Policy CH4 'University of Chester' should be referred to, but in summary the following points are pertinent, alongside the contextual evidence provided above:

- The Parkgate Road Campus is the key site for the University's expansion, with reference to the 2015-2025 Estates Strategy and the University's 2012 Development Framework.
- The LLP1 and LPP2 and national Government policy are all highly supportive of the growth of Higher Education and enabling universities to continue to expand and increase their teaching offer.
- The nature of Higher Education funding and legislation in the UK means that Universities require the ability to take advantage of capital funding opportunities to increase their teaching offer and attract new students and in order to do this they require available expansion land.
- Since its allocation in 2006, the University has expanded significantly on a number of sites, including extensive development of the Parkgate Road Campus site, however these sites have been largely opportunistic in nature and many are former public sector sites which have allowed more immediate expansion in a cost effective way.
- There is no existing capacity for the University to expand at the Parkgate Road Campus site, as acknowledged within the LPP1 and LPP2 evidence base and Policy CH4.
- The site was removed from the Green Belt for allocation in the CDLP specifically to enable the Parkgate Road Campus to expand.
- Glenesk remains the only definitely deliverable site for the University to expand in the future. It is not reasonable that the Council should rely on opportunity sites for the University to be able to expand in the future, and they should take reasonable steps to allocate appropriate sites for this purpose, as was the case via the CDLP.

- An incorrect conclusion has been drawn by the Local Plan Working Group (LPWG) in their report dated 26th June 2017 and this has resulted in the proposed de-allocation of the site. The report wrongly states that the Strategic Flood Risk Assessment advises the withdrawal of the Glenesk site due to its location within Flood Zone 3b.
- The SFRA confirms that none of the site lies within Zone 3b and recommends that development of the site should be subject to the Sequential and Exception Tests.
- It has been demonstrated that the site passes the Sequential and Exception Tests.
- It has also been shown that a proportion of the site (approximately a third) can be developed with no adverse impact on the wider floodplain.

1.37 The University is therefore of the view that existing commitments and potential sources of land have not been fully taken into account in the Local Plan Part 2 Site Allocations, and propose the following change to Policy CH4:

Recommended change:

The extent of the CH4 University of Chester allocation as proposed via proposal map changes should be amended to include the 'Glenesk' site within the Parkgate Road Campus allocation area for the expansion of the University of Chester, for a range of uses as required by the strategic needs of the University.

Justification for expanding the Kingsway allocation

1.38 The University acquired the former Kingsway High School in 2007 after it was declared surplus by the Education Authority. Since then it has undergone substantial refurbishment and improvement, extension and extensive maintenance to create a modern, high quality Higher Education facility. Owing to its former use as a Secondary School, the site benefits from an extensive area of open land to the rear of the main building. As noted earlier, in the University's Development Framework, the Kingsway site is identified as an important location for teaching, community activity and sports.

1.39 The site is therefore a key location for the University for outdoor sports, utilising the existing sports pitches. As suggested in the explanatory text to the Local Plan Part Two Publication Draft (para 2.27), the University acknowledge that 'new development should be focused in

and around the existing built footprint of the campus'. However, notwithstanding that, the University will continue to consider the need to improve and develop the sports facilities at the site.

- 1.40 Since the time of the LPP2 Publication Draft consultation, planning permission has been granted on 27th February 2018 (APP/A0665/V/15/3013622) at Clifton Drive, Sealand Road for the development of up to 142 dwellings, on land including former University of Chester playing fields. This was granted subject to the implementation of a planning obligation to secure a Community Use Agreement for the use of certain playing pitch facilities under the current operation of the University of Chester. This includes the playing fields at Kingsway.
- 1.41 The legal agreement which is in place for the specified periodic use of the playing fields by the local community as part of the Sealand Road planning permission does not impact upon the University's ownership or operations at the Kingsway site.
- 1.42 As stated in the University's representations to the previous stage of the Local Plan, for the sake of completeness and clarity the open area to the rear of the main building should be included within the CH4 allocation.

Recommended change:

The allocation of Kingsway under Policy CH4 should be revised to include the full extent of the Kingsway site under the University's control.

Q3) Is the approach towards site allocations consistent with the policy context provided by the Local Plan Part One?

- 1.43 The University's view is that the approach taken to the site allocations in the LPP2 is not at all consistent with the policy context provided by the LPP1.
- 1.44 The LPP1 Strategic Policies was adopted in 2015 was intended to provide the context to the LPP2 Policies. The LPP1 establishes a Vision for Cheshire West and Chester as a '*desirable and attractive place to live, work, learn and visit*'. Chester '*will be a key asset to the borough with a thriving business, retail and tourism economy and as a centre for learning.*'

- 1.45 A number of LPP1 Policies are of direct relevance to the University estate and provide a positive context to the development of policies which will support the appropriate development of the University's role in Cheshire West and Chester. Primarily, in the University's view, the de-allocation of Glenesk is inconsistent with aims of LPP1 Policy ECON1, which states:

'The Council will promote sustainable economic growth in the borough and wider sub-region, supporting existing businesses, encouraging indigenous business growth and attracting new inward investment. The creation of new job opportunities across a range of sectors will be supported.'

- 1.46 The aim of Policy ECON1 is to encourage continued investment in the borough and attract new inward investment where possible. The University of Chester is regarded as a development opportunity under ECON1: *'The Council will support initiatives and accessibility to further/higher education facilities in the borough including the University of Chester.'*

- 1.47 The University of Chester Development Framework was published in March 2012 and forms part of the LPP1 evidence base. The document seeks to facilitate the continued growth of the University through the allocation of Glenesk specifically to meet the future educational requirements of the University at the Parkgate Road campus, as land with longer term potential and aspirations which has been reserved in the CDLP for expansion land for the University.

- 1.48 The priorities for the Parkgate Road Campus up to 2016 include maintaining the planning policy designation of the Glenesk site as a longer term opportunity for University development, whilst a key element of the Parkgate Road Campus strategy is generally identifying the scope for any new development, away from sensitive site boundaries and focusing any development in the foreseeable future on one of seven opportunity zones, of which one is Glenesk. The site is described as follows:

'The Glenesk site is a green field development opportunity, reserved for University development. The site is specifically allocated for the expansion of the educational facilities at the University of Chester. Consideration in the development of this site will

*include linkages to the main site, access onto Parkgate Road and residential amenity.
The site is likely to be suitable for development at a scale of three to four storeys.'*

- 1.49 As detailed in the University's response to Matter 8 (Policy CH4), it is reasonable to assume that an expansion to the University will necessarily be located in close proximity to the main University campus, and hence the Development Framework identifies the need to include linkages between Glenesk and the existing Parkgate site. The Glenesk site is therefore recognised as being a realistic and feasible option to provide an extension to the Parkgate Road Campus in the LPP1.
- 1.50 In the University's view, the approach taken to site allocations does not meet the test of soundness as set out at NPPF Paragraph 35. Specifically, it is not justified, as it is not an appropriate strategy based on the available evidence. It is also not consistent with national policy, as it does not provide an opportunity to achieve sustainable development and reasonably cater for the strategic expansion of the University.