



**EXAMINATION OF THE CITY OF YORK LOCAL PLAN  
2017-2033**

**PHASE 3 HEARINGS**

**MATTER 2: UNIVERSITIES AND COLLEGES**

**CITY OF YORK COUNCIL STATEMENT**

## **Matter 2 – Universities and Colleges**

### **2.1 What are the needs of the various Universities and Colleges?**

#### *University of York (UoY)*

2.1.1 UoY has presented scenarios for potential future full time equivalent (FTE) student number growth and translated these into floorspace and land requirements up to 2038. The University is not clear on its “base” or “preferred” scenario but it has identified 1.25% pa (Scenario 3) and 1.50% (Scenario 4) as “likely”. Scenario 4 produces a growth of 6,318 additional students by 2038.

2.1.2 CYC challenges the UoY estimates of need because:

- There is significant uncertainty over future student growth and a number of factors mean that growth rates over the last decade are unlikely to be sustained.
- The trend to remote and online learning is expected to continue and is viewed favourably by students. This will lower need for large teaching spaces and may reduce overall space needs.
- UoY has not examined alternative ways of accommodating future floorspace need and its demand for additional land. There are opportunities to use existing space more efficiently and to use Campus West more intensively. There are alternative approaches available for estate development which will reduce the area of land needed to accommodate growth.
- CYC does not accept that co-location of all university related space is necessary for the UoY’s success. Other successful universities operate on a multi-campus model. Indeed, the UoY itself already operates from sites beyond Campus East and Campus West.

2.1.3 These points are expanded on in Appendix 1

#### *Other Universities and Colleges*

2.1.4 The Council has engaged with York’s universities and colleges on projected growth needs and estate plans. Drawing on this engagement, Section 7 provides a positive and sustainable framework for university and college development to meet needs over the life of the Plan.

## 2.2 Does the Plan properly provide for the needs of the various establishments?

2.2.1 Yes, the Plan provides for the needs of various establishments. It provides a positive framework for the future development of the universities and colleges in York as set out below.

### *University of York*

2.2.2 Plan policies ED1 to ED3 provide an enabling framework for delivery and a site for expansion is provided in Policy SS22 and associated site allocation ST27.

2.2.3 The forecast growth in student FTEs by 2038 of 6,318 is extrapolated by UoY into additional GIA requirements as follows<sup>1</sup>:

- 80,512 sqm of academic/support space
- 184,490 sqm of space for residences

2.2.4 With space remaining to be developed on Campus West of some 31,000 sqm, UoY translate this into a net additional space requirement of 234,003 sqm. This then translates into a land requirement of 32.3 ha.

2.2.5 CYC believe that the forecast of residences floorspace demand is wrong and should be 69,225 sqm not 184,090 sqm based on an additional need for 2,769 beds at 25 sqm per bed (UoY use 29 sqm/bed).

2.2.6 An alternative approach to accommodating future student growth is presented (see Appendix 1) which assumes improved space utilisation more aligned to other universities in UoY's peer group<sup>2</sup> and assumes that there is potential to use Campus West more efficiently through redevelopment of older, unfit buildings.

2.2.7 On an alternative scenario, CYC believe that student growth under Scenario 4 can be accommodated within 12.4 ha and well within the 21.5 ha allocation. There would remain some flexibility for growth above the Scenario 4 level and for accommodating "one off" development opportunities.

2.2.8 These points are expanded on in Appendix 1.

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<sup>1</sup> This is based on information received on 4 July 2022. As referenced, there is believed to be an error in the calculations used to derive space needs.

<sup>2</sup> We have compared UoY estate and current space use to a peer group of universities of similar standing, similar age and similar estates (see Appendix 1, Annex D)

*York St John University*

- 2.2.9 Policy ED4 supports development and redevelopment of the Institutes Campus at Lord Mayors Walk. Policy ED5 supports further expansion of the Institute and includes both a student housing allocation SH1 and recognition of sports uses at Northfield. This is considered to provide a suitable framework for the University to develop and grow.

*Askham Bryan and York College*

- 2.2.10 Policy ED7 provides a positive framework for development at Askham Bryan and York College at their existing sites, with the other development management plan policies in the Plan relevant to this future development.
- 2.2.11 In relation to Askham Bryan College, CYC is proposing a modification to remove the main campus buildings from the Green Belt (outlined later in this statement). CYC note that the College has developed a masterplan for development of their site (included in their 2021 representation, but not in earlier submissions) which proposes expansion into the Green Belt. CYC consider there could be opportunities to better utilise the existing site without release of Green Belt land. The existing campus is relatively low density and there may be opportunities for intensification. Additionally, given Askham Bryan is an agricultural college, elements of their activity can be accommodated in line with approved Green Belt uses under Plan Policy GB1, which permits agricultural use on Green Belt land.

**2.3 Is the approach of the Plan to Universities and Colleges justified in Green Belt terms (whether in terms of Green Belt boundaries, or ‘washing over’)?**

- 2.3.1 The approach to University and Colleges is justified in Green Belt terms and, with the modifications proposed in respect to Askham Bryan (see Appendix 2). For ease of reference, maps showing all of the Green Belt boundaries in question have been appended to this Statement in Appendix 3.
- 2.3.2 Section 7 of EX/CYC/59 explains how, in accordance with the NPPF, the Council has taken into account the need to promote sustainable patterns of development, by channelling development towards urban areas, and towns and villages within the Green Belt and considered locations beyond the outer Green Belt boundary.
- 2.3.3 Site selection generally was based on sustainability principles that aligned with the spatial strategy. This is relevant to Green Belt policy as boundary setting needs to be carried out in a way that is consistent with the Spatial Strategy. Site selection and SA processes have had

regard to the historic character and setting of York, the primary Green Belt purpose. More specifically SA objectives 14 and 15 have a strong correlation with Green Belt policy. Alongside the findings of the SA, a Heritage Impact Assessment (HIA) has informed the appraisal of the draft Local Plan and the appraisal of draft strategic sites. Thereby all proposed development within the Local Plan has been assessed against all principal characteristics identified by the Heritage Topic Paper (SD103).

- 2.3.4 A clear and defensible Green Belt boundary has been defined around the universities and colleges in accordance with the NPPF, applying the boundary methodology set out in Section 8 of TP1 Green Belt Addendum (EX/CYC/59) and taking into account the findings of the Heritage Topic Paper and the HIA, as well as the findings of the SA. The boundary has been defined in accordance with the Strategic Principles set out in TP1 (EX/CYC/59), in particular Strategic Principles 6, 7, 12 and 13 (p38-39):
- SP6 - The Heritage Topic Paper Principal Characteristics set the framework for assessing overall impact and harm on the historic character and setting of the City (and examining sprawl and encroachment).
  - SP7 - The characteristics of York that are relevant to keeping land permanently open to protect the historic character and setting of the City and therefore relevant for setting the detailed boundaries of the York Green Belt are: compactness, landmark monuments, and landscape and setting.
  - SP12 - York Green Belt boundaries will be created that will not need to be altered at the end of the plan period (2033).
  - SP13 - Detailed boundaries will be defined clearly, using physical features that are readily recognisable and likely to be permanent.

#### *University of York*

- 2.3.5 The Green Belt boundaries around the University of York are described in Annex 3 of the Green Belt Addendum EX/CYC/59e.
- 2.3.6 To the east of the University of York Campus East (see Section 7, Boundary 1-6, pA3:668), the proposed Green Belt boundary follows clearly defined features which are recognisable, in accordance with the NPPF and the methodology. This includes the landscaped edge of the Park and Ride, Lakeside Way, the edge of York Sports Village indoor facilities and car park, and the edge of the outdoor cycle loop. Given the level of redevelopment over recent years, many features in this location are modern in origin however the proposed boundary has sought permanence in using the urbanising features which have emerged as part of the University's development. Alternative boundaries have been explored in the assessment (see pA3:676) however these alternatives would risk harm to Purpose 3 and 4.

- 2.3.7 The land to the south of the Campus East (see Section 7, Boundary 7-8, pA3:679) consists of the allocation ST27. The proposed Green Belt boundary of ST27 is described in Annex 3 at pA3:689. The boundary follows clearly defined features which are recognisable, in accordance with the NPPF and the methodology. The boundary includes the A64 which is a durable and permanent feature. The remaining boundaries include a hedge lined field boundary, a fence, and a tree and hedge lined track. Although these are clearly defined permanent features, the assessment at pA3:690 recommends that these boundaries are strengthened as part of the masterplanning of the site to ensure continued permanence in the long term. There are no alternative boundaries which could be used for ST27 which would offer greater permanence, and which would ensure that the potential harm to the Green Belt is minimised.
- 2.3.8 The summary section on pA3:690 of Annex 3 explains how the potential harm to the Green Belt has been mitigated through the location and boundaries of allocation ST27, taking into account the findings of the Heritage Topic Paper and the Heritage Impact Assessment. This includes through the provision of landscape buffers and screening to separate development from the A64 as this is important to protecting the rural setting of the City. Furthermore, the location of ST27 does not risk any coalescence of the campus with Heslington Village to the west, as this is important to Purpose 4.
- 2.3.9 To the west of Campus East (see Section 7, Boundary 9-12, pA3:691), the proposed Green Belt boundary further follows clearly defined features which are recognisable, in accordance with the NPPF and the methodology. This includes roads, the built edge of the weir, the northern banks of the eastern lake, and the edge of the University colleges development. Given the level of redevelopment over recent years, some of these features are modern in origin however the proposed boundary seeks to provide a clear distinction between built form and open land and offer strength and resilience to future change. Alternative boundaries have been explored in the assessment (see pA3:694) and although some of these features may offer greater permanence, these alternatives would risk harm to Purpose 4, particularly due to coalescence. The proposed boundary performs an important role in protecting Purpose 4 as it maintains the scale and identity of different areas by preventing coalescence.
- 2.3.10 To the west of the University of York Campus West (see Section 7, Boundary 15, pA3:711), the proposed Green Belt boundary follows clearly defined features which are recognisable and which have been established for a significant period of time, therefore providing permanence. This accords with the NPPF and the methodology. The boundary follows the rear of the University campus. There are no alternative boundaries in this location as the land to the west of the proposed boundary is identified as Walmgate Stray (A3) and Green

Wedge (C3) in Evidence 11b of Annex 1 of the Green Belt Addendum EX/CYC/59a.

- 2.3.11 In conclusion, the proposed Green Belt boundary around the University of York (including the allocation ST27) is sound

*York St John's University*

- 2.3.12 A clear and defensible Green Belt boundary has been defined around York St John's University Sports Campus in accordance with the NPPF and the methodology. The Green Belt boundaries around the York St John's University Sports Campus on Haxby Road Sports Park are described in Annex 3 of the Green Belt Addendum EX/CYC/59d at pA3:350 to A3:362 as Section 5, Boundary 1 (Nestle Factory) and Boundary 2 (Haxby Road). The proposed Green Belt boundary follows clearly defined features which have been established for a significant period of time, therefore offering permanence. This consists of the fenced northern periphery of the Nestle Works site and Haxby Road. The Northfield part of the Sports Campus (located to the west of Haxby Road) is proposed to be included within the Green Belt. This consists of playing fields providing football and rugby pitches. There is no built form and no floodlighting. In contrast, the Mille Crux part of the campus (located to the east of Haxby Road) is excluded from the Green Belt as this has considerable built development including a hub building and teaching facilities as well as indoor and outdoor sports facilities with floodlights. Furthermore, Millie Crux is enclosed by built development and Haxby Road and it doesn't connect into the wider surrounding Green Belt. As detailed on pA3:354, the proposed boundary marks a clear distinction between the built and open environment and consists of recognisable and permanent features. The outdoor sports and recreational uses within the Northfield part of the campus preserve the openness of the Green Belt and are acceptable uses within the Green Belt. Alternative boundaries are explored in the assessment however these alternatives would risk harm to Purpose 1, 3 and 4. The proposed boundary is therefore sound.

*Askham Bryan College*

- 2.3.13 Askham Bryan College is assessed in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:334. Annex 4 provides an assessment of villages and other developed areas not adjacent to the main urban area. Strategic Principle 5 states that such areas need to be considered separately in relation to their contribution to openness. Annex 4 therefore provides an assessment of these areas against paragraph 86 of the NPPF. Paragraph 6.26-6.30 of TP1 (EX/CYC/59) describes how paragraph 86 of the NPPF has been considered and the factors which are relevant. Where insetting of the villages and other developed areas has been deemed necessary, the boundary definition methodology set out in Section 8 of TP1 has then been applied.

- 2.3.14 The assessment in Annex 4 concludes that Askham Bryan College should be washed over by the Green Belt. The assessment has been reviewed and revisited and the Council proposes a modification to Askham Bryan College in order to remove it from the Green Belt. The justification for this modification is to ensure consistency with the Green Belt methodology. In accordance with the methodology, Askham Bryan College has been reassessed (see Appendix 2).

## **2.4 Are Policies ED1-ED5 and ED7 effective?**

- 2.4.1 Policies ED1 – ED5 and 7, are effective as they are positively drafted and provide decision makers with a clear indication of how to react to proposals in line with NPPF 2012, paragraph 154. They:
- Respond appropriately to the needs of the universities (and provides allocations to address specific needs where appropriate – site allocations SH1 and ST27);
  - Provide clear parameters for development at these sites including appropriate uses; and
  - Set out in Policy ED1 – 5) design considerations to ensure development that comes forward at these sites is sustainable and responds appropriately to the wider context.
- 2.4.2 Modifications are proposed to clarify application of policies ED1 to ED3 (and related policies SS22 and EC1). These are detailed in CYC's latest Phase 3 Schedule of Modifications and in summary these:
- Move supporting text and policy content in ED3 related ST27 into Policy SS22 (deleting references in ED3) for clarity and to avoid duplication/overlap;
  - Make clear application of the buffer between development on ST27 and the A64 needs to be within the red line only where the site is parallel with the A64;
  - Express knowledge business floorspace in square metres rather than hectares in Policy EC1, making clear this is indicative, providing flexibility on the employment use delivered;
  - Acknowledge potential scope for intensification of Campus West as part of redevelopment, subject to a further study and engagement with Historic England; and
  - Set out clear policy support for University uses in E class in the City centres and other employment locations (noting the existing presence of the University in the City Centre).
- 2.4.3 These clarifications are not soundness related but enhance the effectiveness of policies referenced for completeness.



**2.5 Is the Policy SS22 (ST27) sufficient for the purposes of the University of York?**

- 2.5.1 Yes, CYC maintains that its allocation of 21.5 ha is sufficient to accommodate the UoY's future needs for the reasons outlined under 2.2.
- 2.5.2 CYC agrees that the success of the UoY is important. CYC also consider that UoY can continue to grow and succeed and can continue to be a key driver of the city, regional and national economy over the long term within the land allocation proposed in Plan. There are alternative options available (aligned with the submitted Plan) to the University's own proposals to provide the necessary floorspace, and to enable growth, success and the delivery of economic benefit, which the University has not sufficiently considered. The issue cannot properly be determined now since the University has not fully assessed its options and the alternatives. It also appears that UoY is unsure of its base data and methodologies use to assess future space and land need. It has been correcting data calculations and submitting new material even at a very late stage; and there are questions about access to the original modelling work. CYC has commented on the latest changes in Appendix 1 and in its Addendum paper of 6 July 2022.
- 2.5.3 CYC believe that available alternative approaches would ensure that the UoY's requirements are accommodated appropriately and sustainably, without the excessive inroad into the Green Belt as currently proposed.