

City of York Council
Examination of the City of York Local Plan
2017 – 2033

Schedule of
Matters, Issues and Questions for the Examination
(EX/INS/37)

Phase 3 Hearings

Matter 2 – Universities and Colleges
St Peters School, Ref 883

Representations on Behalf of
St Peters School, York

5th July 202



Chartered Town Planning Consultants

York Emerging Local Plan Examination in Public Phase 3 Hearings: Matter 2 Universities and College; Response on behalf of St Peter's School York

CONTENTS

1. Introduction
2. The School Profile
3. National Policy Context
4. Responses to the questions from the Inspectors
 - Q2.1 What are the needs of the various Universities and Colleges?*
 - Q2.2 Does the Plan properly provide for the needs of the various establishments?*
 - Q2.3 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')?*
 - Q2.4 Is Policy ED6 effective?*

APPENDICES

APPENDIX A

Map 1 – Proposed Green Belt Boundary

APPENDIX B

Map 2 – St Peter's School 15 Year Development Masterplan

York Emerging Local Plan Examination in Public Phase 3 Hearings: Matter 2 Universities and College; Response on behalf of St Peter's School York

1. INTRODUCTION

- 1.1 This statement should be read together with the previously submitted representations to the emerging Plan, which in particular explain how the school has expanded to encompass additional parts to its Estate giving rise to substantial challenges which would be heavily constrained by the extremely tightly drawn green belt boundary:

St Peter's School York ref 883:

Reps in respect of Green Belt boundary proposed inside School campus: -

July 2019 PM30. (EX/CYC/21d)

Alternative Green Belt boundary proposed by School in Appendix 1;

July 2021 2nd PM75. (EX/CYC/66i)

Alternative Green Belt boundary proposed by School Attachment E

2. THE SCHOOL PROFILE

- 2.1 This statement has been prepared on behalf of St Peter's School York. It is a large school with a pupil roll, presently over 1200. It was recently awarded the Times Educational supplement Independent School of the Year 2021 and was The Sunday Times Northern Independent School of the Year 2019.
- 2.2 The school roll includes its Sixth Form College of 250 students. Currently 48% of pupils have a home address within the City Council's boundary and 91% of all pupils have a home address within a 25km radius of the school. It is thus serving a city and sub-regional hinterland.
- 2.3 The strategic aim of the school is to further develop the provision of excellent independent education for pupils aged 2-18. The school is a dynamic institution, as curricula change, pupil numbers, and as educational needs, legislation, compliance issues change; along with improvements in energy efficiency and a drive for increased sustainability.
- 2.4 The school campus is 17.4ha, located in the centre of the city on A19, Clifton. Its senior school and pre-preparatory school are both located at the northern edge of the campus and the preparatory school is located towards the south. The school abuts built development on its boundaries to the west, north and east also the south

across the River Ouse. Immediately beyond the southern boundary is a 4m high flood bank, public open space and the river.

- 2.5 The built facilities range from historic listed buildings, more recent inefficient stock to modern efficient buildings of high design quality. The school has a strong ethos of sport; its campus includes a range of sporting pitches.



3. NATIONAL POLICY CONTEXT

3.1 The Plan (as submitted) is not consistent with the National Planning Policy Framework 2012 (the Framework) and is not sound.

3.2 The Framework 2012 outlines the process for the preparation of local plans and in particular the establishment of Green Belt boundaries. At its heart is the presumption in favour of sustainable development (§14). Local Planning Authorities (LPAs) are tasked to objectively identify and then meet the housing, business and other

development needs of an area, and respond positively to wider opportunities for growth (§17). The Government's commitment to ensuring that the planning system does everything it can to support sustainable economic growth requires that planning should operate to encourage, and not act as an impediment to, sustainable growth (§18,19).

- 3.3 LPAs should set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period. They should plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high-tech "industries" (§21).
- 3.4 Government attaches great importance to ensuring that sufficient choice of school places is available to meet the needs of existing and new communities. LPAs should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools and work with schools' promoters to identify and resolve key planning issues before applications are submitted (§72).
- 3.5 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (§79). Their permanence is stressed in §83.
- 3.6 Defining the boundaries for the first time should take account of the need to promote sustainable patterns of development (§84). Consistency with the Local Plan strategy should be ensured and land which it is not necessary to keep permanently open should not be included (§85).
- 3.7 Any institution would have a permanent requirement to establish very special circumstances to justify its expansion within areas covered by Green Belt (§88).
- 3.8 Local plans should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development (§151). They should be aspirational but realistic and they should address the spatial implications of economic, social and environmental change, §154.

- 3.9 Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. LPAs should set out strategic priorities for the area including strategic policies to deliver, *inter alia*, the provision of health, security, community and cultural infrastructure and other local facilities (§155, 156).
- 3.10 Each LPA should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (§158). They should work with other authorities and providers to assess the quality and capacity of infrastructure for ...education... and take account of the need for strategic infrastructure (§162).
- 3.11 The Local Plan submitted for examination should be 'sound', that is: positively prepared; justified; effective and consistent with national policy (§182).

4. RESPONSES TO QUESTIONS FROM THE INSPECTORS

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

- 4.1 Included in the 2021 reps is St Peter's School Site Development Justification prepared by the Director of Operations, and the 15-year draft Development Masterplan prepared by MBO architects (see Appendix 1 and 2 respectively of EX/CYC/66i). These set out the detailed needs. Map 1 below shows the school's 15-year Development Masterplan. In summary, the need for built development over the Plan period relates to:
- The establishment of hubs (Grouped facilities rather than standalone departments).
 - Improved traffic management.
 - Provision for enhanced Music, performing arts, sport, expansion of the STEM hub to form an inclusive STEAM hub and dining facilities.
 - Improved and safer connections within the site.
 - Responding to the schools ongoing development needs and improved facilities master plan for a minimum 15-year period.
 - Providing decant space, construction compounds and access
 - Changes in the curriculum and increase in pupil numbers will require some academic facilities to upgrade, increase in any case, with the gradual rise in pupil numbers.

- replacement and refurbishment of existing buildings as part of an ongoing program of improvement to form facilities of an acceptable standard.
- Modern curriculum requirements also place an onus to plan ahead, improve and provide
- Address concerns brought about by the covid pandemic, that will ensure compliance with measures and provide a safe environment for all in the future.

4.2 More specifically, the school's vision and masterplan seek to deliver:

- a) Music - The school now requires dedicated purpose-built music teaching, practice, and ensemble rooms, as well as improved, appropriately designed performance spaces more suitable for hosting music events. An additional 80 individual music lessons a week are required for the choristers who joined the school in 2020 following the closure of the Minster School, which has been part of the fabric of the city for over a millennium. Temporary converted glamping pods were hurriedly installed as music teaching and practice rooms to accommodate this influx.
- b) Performing Art - A purpose-built performance space with a greater audience capacity, which could also help to overcome some of the other constraints mentioned above is also required, plus additional rehearsal and studio space to meet the needs of the drama curriculum more adequately
- c) Sports Hub - Working with the local community to provide beneficial shared facilities and the creation of new all-weather synthetic pitches and improvement of existing sports pitches and landscape buffers. The installation of synthetic pitches for hockey in particular, and installation of flood lights is essential. With the rapid increase in popularity and success in hockey the school is now transporting students to other synthetic pitches all-round the city for practice and for matches which is highly undesirable, in terms of lost time for staff and pupils as well as putting additional coaches on the congested road network of York.
- d) Further facilities would include studio space for exercise and dance classes. Multiple changing and showering facilities. Introduction of onsite squash courts,

medical and physio rooms. Dedicated sports classrooms and offices should all form part of a central sports hub.

- e) Improved access – proper access to the south campus below the PROW, including provision of much needed clear emergency access to the south and north campus areas, and also reviewing additional student connections between the north and south of the campus and creating a safe environment ensuring that open space and footpath links within the campus are overlooked and better connected.

4.3 The School site requires flexibility in order to deliver its masterplan due to some notable constraints:

- Protected trees.
- Plateaued site topography.
- Existing urban development to the North, East and West of the site.
- Flood risk - River Ouse Wash Lands and Flood Barrier to the South.
- Eight Grade II Listed Buildings and the defined Conservation Area.
- The existing Public Right of Way west-east through the site.
- Retained right of way to existing surface water pumping station

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

4.4 No, the Plan does not properly provide for the development needs of the School.

4.5 The inner Green Belt boundaries proposed within the lower campus seriously constrain the Plan's ability to facilitate sustainable growth and redevelopment during the plan period, in order to meet the legitimate needs of the School during the extended local plan period to 2038, by requiring necessary development to surmount the policy hurdle of very special circumstances.

4.6 The Plan will seriously impact upon the School's ability to continue to provide high quality education, economic benefits and is therefore seriously counter-productive to its aims and objectives. In this regard, the Plan is not evidence based and does not comply with NPPF para 85 or 86 and frustrates the School as a growing centre of academic excellence.

York Emerging Local Plan Examination in Public Phase 3 Hearings: Matter 2 Universities and College; Response on behalf of St Peter's School York

- 4.7 In summary, the Green Belt boundaries have been arrived at without understanding the foreseeable needs of the School and failing to apply national policy and/or the Plan's own strategy (adequately or at all). This has resulted in clear conflict between the local plan strategy and the resultant boundaries of Green Belt proposed (contrary to §84 and 85 of the Framework).
- 4.8 The Plan fails to engage, collaborate or deliver the needs of the School, when the Plan's strategy claims to support its growth (consistent with national policy). The Plan is therefore internally inconsistent and unsound. Implementation of the Plan's strategy involves meeting identified requirements for sustainable development when defining Green Belt boundaries. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential (§155, 156, 158). However, this has not been carried out to any meaningful extent.
- 4.9 The continuous and extensive improvement of the school site and facilities in the heart of York is essential to fulfilling the vision of the Board of Governors and ensuring the future success of St Peter's School, which is to the wider benefit of the social and economic life of the city
- 4.10 Were the Green Belt boundary to be drawn as currently proposed by the Plan it would essentially ignore the evident and multiple needs of the school to secure the above improvements to its estate. It is highly regrettable that the City Council has not liaised properly with the School to understand its needs and sought to draw the Green Belt boundary accordingly. Whilst it is understood that Green Belt designation is not an absolute preclusion on development it nonetheless seriously undermines the School's ability to properly plan for known eventualities.
- 4.11 Should the Green Belt boundary be drawn in the most logical location, as shown on Map 1 below (i.e. along the line of the newly increased in height flood defences (shown in photograph 1 below) then the school would intend to bring forward and fully deliver its masterplan within the next 15 years, thereby securing and enhancing the future for the school as one of the city's key assets.
- 4.12 It is of paramount importance for the School to enhance and expand high quality educational facilities to ensure continued and improved educational excellence in an ever more competitive and challenging environment. The School is an evolving and highly successful institution, with numerous existing constraints to developing the facilities as outlined above. The ability to redevelop and reconfigure the southern side of the campus in particular is seen as essential for the sustained success of the school

without additional constraints, such as the proposed green belt boundary, which will clearly hinder unacceptably the reconfiguration and redevelopment of the whole site.

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')?

- 4.13 No, Policy ED6 supports the expansion of Schools yet the southern campus is proposed to fall within the Green Belt except for existing buildings, (EX/CYC/59h) PM75, page 16. Properly understand, the whole campus falls within the urban area with development on three sides. It is all actively used and required for the success and expansion of the School. The campus is patently not open land. The school campus does not meet any of the three Green Belt purposes: -
- Its development could not lead to urban sprawl as the fourth, southern, boundary is bordered by a 4m high flood bank that is recognisable and permanent.
 - its development could not result intrusion into the countryside.
 - Its development or redevelopment would not impact on the historic setting of the city because of the campus' strong urban boundaries.
- 4.14 Therefore, in terms of the policy context and the absence of any Green Belt purposes being met, the school campus should not logically be placed in Green Belt. Thus, the plan is unsound. It can be made sound in this case by utilising the flood bank as an obvious and defensible boundary to the Green Belt, , consistent with the Framework.

References:

In the School's July 2021 reps: -

- the proposed Local Plan's boundary is shown at ATTACHMENT B.
- Alternative boundary proposed by School is the adjacent flood bank, ATTACHMENT E (also see Map 1 below).
- Evaluation of why the Green Belt boundary is erroneous is found in the ASSESSMENT page 12.

2.4 Is policy ED6 effective?

4.15 For the reasons set out below, §85 of the Framework has not been followed in the definition of a proposed boundary around the School:

- **Ensuring consistency with the Local Plan strategy:** The proposed boundary is drawn far too tightly around the southern campus' building footprint, removing development potential, even for additional all weather pitches with lighting. This has also taken no account of the legitimate needs of the School to replace and augment their current built estate nor the need for decant space to develop additional floorspace yet keep the School operational throughout. The Local Plan **policy ED6** supports new and enhanced educational facilities so that there is an inconsistency with the Local Plan strategy.
- **Ensure permanence in the boundaries proposed:** The Council's boundary modifications have proposed a 2-tier approach to school campuses in that those adjacent to the Green Belt have 'lost' their undeveloped campus space to Green Belt whilst schools wholly within the urban area have their whole campus allocated for educational use. This is inconsistent given that all schools should have the same acknowledgement of their need to replace and/or augment their building provision over time. The proposed Green Belt boundary immediately inhibits the scope of these Green Belt schools to cater for their legitimate growth and enhancement, thus pressure to revise the Green Belt boundaries to allow such growth will become immediate. This threatens the permanence of the boundaries.
- **Define boundaries clearly using physical features that are readily recognisable and likely to be permanent:** The eastern section of the southern boundary of St Peter's estate runs along the northern edge of the Lower Bootham flood defences. This flood bank has been recently raised and is now 4m high and 15m wide at its base. This is a strong physical feature that is readily recognisable and very likely to be permanent. In contrast, the 'doily effect' of the Council's proposed boundary around the current building footprint is not permanent as buildings can be extended or demolished and replaced over the plan period. The amendments to Part 7 class M of the GPDO (2015) which came into force

on 21 April 2021 is a case in point since it allows for extensions etc to schools by up to 25% of their April 2021 footprint without planning permission provided that the works are not located on playing fields.

- **Not include any land which is unnecessary to keep permanently open:** The dominating flood bank obstructs views into the southern part of the St Peter's campus so visually severing it from the river corridor and public open space to the south, which are clearly defined. In this circumstance, there can be no justification to include the school's land north of the bank in the Green Belt.

The Council are in effect concluding that the 4m flood bank between the School and river corridor, as shown on the photograph below, does not affect openness of the School and the river corridor run together. This is refuted.



- 4.16 The evidence base utilised by the Council for identifying requirements for sustainable development, particularly for the School, is either out of date or non-existent. It is contrary to the School's own detailed evidence, with which the LPA must engage, collaborate and seek to meet. Therefore, requirements for sustainable development have not been identified and/or met adequately, even though this is the requirement of the Framework and the Plan's own strategy.
- 4.17 Boundaries have been defined with the overriding objective of maximising the area of the Green Belt, with inadequate reference to the Local Plan strategy to justify the designation where it is in direct opposition to Plan policies.
- 4.18 Inadequate allocations are proposed to meet local plan policy objectives, resulting in the need to amend the Green Belt boundary within the plan period.
- 4.19 The exercise carried out by the Council in TP1 ADDENDUM January 2021 (EX/CYC/50) has focused on defining the purposes met by any area in the broad extent of Green Belt as an overriding criterion and setting aside consistency with the Local Plan strategy in meeting requirements for sustainable development.

APPENDIX A

Map 1 – Proposed Green Belt Boundary


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— — — — — Proposed Boundary of Green Belt

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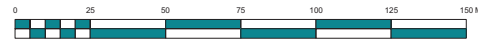
Client:
St Peter's School, York

Project Title:
Master Plan

Drawing Title:
Proposed Greenbelt Boundary

Scale @ A1: 1:1250 Date: 18-05-21 Drawn: jch

Project Ref: **SP06** Drawing No: **006** Stage: **1** Rev: **a**



APPENDIX B

Map 2 – St Peter's School 15 Year Development Masterplan

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St Peter's School Departments and Uses

- Accomodation
- Estates
- Mixed Academic
- Performance Hub
- STEAM Hub
- Dining Hub
- Sports Hub
- Medical Centre
- Library
- Points of Entry
- Impact of proposed CYC Green Belt Boundary
- Site Boundary

- A** Performance Space
- B** Music
- C** Sports Music & Exams & Performance
- D** Art & Technology
- E** Parking
- F** Medical Centre
- G** Dining Hub



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Drawing Title:
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Date:
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Project Ref: **SP06**

Drawing No: **005**

Stage: **1**

Rev: **c**

File Ref: K:\job\St Peters Site Survey 03 2021

