



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

PHASE 3 HEARINGS

MATTER 3: STUDENT HOUSING

CITY OF YORK COUNCIL STATEMENT

Matter 3 – Student Housing

3.1 What is the need for student housing?

3.1.1 The Plan sets out an enabling policy framework to meet the needs of the approximately 38,000 students studying at higher and further education institutions in the City and future growth associated with the University of York and York St Johns’.

3.1.2 At 1.33 of the Local Plan [CD001], the important role educational institutes play in the City is recognised. The Plan identifies that the City has 20,000 higher education students and 8,000 further education students. These figures have been updated to reflect 2020/21 figures in the latest schedule of proposed modifications. There are now 30,275 higher education students within the City. These students will require accommodation and a proportion of this will be purpose-built student housing. The Plan does not identify a student housing need figure or specific target for purpose-built student housing (in C2 Use Class). This is because:

- The amount of student housing required is dependent on current levels of students and projected growth, which itself is subject to challenges and uncertainty (as detailed in the Council’s Phase 3, Matter 2 hearing statement).
- The need for purpose-built housing, as distinct from housing occupied by students, is informed by a range of factors including the University’s estate strategies/ business plans and any student accommodation policies/ processes *and* student demand for purpose-built accommodation.

3.1.3 The need for student housing will be determined by the level of student growth planned for by the individual universities over and above that planned for through the Objectively Assessed Housing Need (OAN). The Council continues to engage with higher education institutes to understand the growth projections and the need for student accommodation to support this in line with paragraph 004 of ‘Housing needs of different groups’ of the 2021 National Planning Practice Guidance. The OAN does not specifically identify a need for student housing, but it is informed by demographic projections which will be based on trends and which will pick up historic change in the student population.

3.1.4 The projections themselves do not separate out students need, but typically, the changes in a specific ‘student age’ cohort (normally 18-24) would give an indication of potential growth in the student population. However, not all change in the age group will necessarily be students (although all or more could be). Nationally around 30% of students are older than this.

- 3.1.5 The latest (2018-based) SNPP (alternative internal migration variant) shows a growth in the 18-24 age group of 4,428 people in the 2021-33 period (369 per annum). The latest SNPP (2018-based) cover a trend period where student growth has been seen to be very strong and therefore, by definition, student growth predicted using these trends will reflect this.
- 3.1.6 The delivery of 822 dpa would result in a growth in population aged 18-24 of 5,185 (2021-33) – 432 per annum; this represents a 16.4% increase in this age group over the 12 years.
- 3.1.7 As noted above, it is not clear what proportion of these figures for this age group would be students, or the number of students within older age groups. However, it is reasonable to assume a high proportion of the change in the 18-24 age group will be students.
- 3.1.8 As a comparison, in neighbouring Harrogate (which does not have a significant student population), the latest SNPP shows the population aged 18-24 as only being projected to rise by 1.5%.
- 3.1.9 While this underlying growth figure is unknown for York, the Harrogate figure is a useful baseline of growth in an area without a significant student population. If there were a similar underlying figure for York then virtually all of the 432 per annum growth would be students (to which potentially a further 43% could be added for those aged over 24). It is estimated that student growth in the projections (linked to 822 dpa) could be as much as around 620 additional student per annum to 2033.
- 3.1.10 Alternatively, it is noted that the latest Annual Population Survey suggests that in the year to December 2021 44.3% of the 18-24 year old age group in the City were in Full Time Education. This data would suggest growth within the OAN of around 275 students per annum (including the 30% aged 25+) rather than 432 as indicated by SNPP above.
- 3.1.11 Therefore, the Council estimate a range of student growth based on latest projections and linking to the OAN to be in the range of 275-620 per annum.
- 3.1.12 By comparison, Lichfields in their response to Matter 2 in Phase 2 Hearings [HS/P2/M2/OAHN/6, pdf page 55] suggests an additional 581 students living in York per annum to 2033, and 367 per annum needing housing. These are very top end figures based on a very high growth assumption, but still within a reasonable range of likely growth already embedded within the OAN.
- 3.1.13 Overall, it is hard to see a case where the projections do not include sufficient student growth to match any reasonable expectation of future student increases. On this basis there is no need to increase the housing requirement or need estimate to take account of the student population.

3.2 Is the general approach of the Plan to student housing justified?

3.2.1 Yes, in the context of the uncertainties in projecting student numbers above, the Council has defined a flexible approach to the delivery of student housing in the Plan. The need for student housing is determined by the level of student growth planned for by the individual institutes and the Plan seeks to support and direct this need while allowing the educational facilities flexibility in delivery. The Council continues to engage with higher education institutes to understand the need for student accommodation to support this in line with paragraph 004 of 'Housing needs of different groups'.

3.2.2 Policy H7 sets a general approach to the delivery of student housing and both York St Johns and the University of York to must address the need for any additional student housing which arises because of their future expansion of student numbers. Policies ED1 to ED5 (inclusive) and ED7 provide directed policies for the University of York, York St Johns University and Askham Bryant College to further elaborate. .

3.2.3 ED1 requires that the University of York addresses the need for student housing to as a result of growth and expansion plans. The policy expects this provision is made on their campus in the first instance. Policy ED2 states that 3586 bed spaces for students are retained on campus west (or re-provided on Campus East) while ED3 requires additional student housing to be provided to cater for expansion of students. The supporting text at 7.7 requires an annual student accommodation survey to be submitted to the Council to assess unmet need. If unmet student housing demand on site is in excess of 50 bedspaces the university must undertake to bring forward and implement plans to provide additional accommodation on site, in units of 300 bedspaces, within two years of the date of the survey, so long as it is economically prudent to do so.

3.2.4 The Sustainability Appraisal Feb 2018 [CD008] at paragraph 6.627 provides commentary relating to ED1-5 and ED7. This states that:

'The policies have been assessed as having a significant positive effect upon SA Objectives 1 (Housing), 2 (Health), 3 (Education), 4 (Jobs) and 6 (Travel). The provision of housing for students and staff (ED1, ED4 and ED5) will meet these particular needs and can have beneficial indirect impacts on the local housing market approach ensures that student housing'

3.2.5 It is considered that the approach to the delivery of student housing is justified. Student housing need is driven by the growth and expansion plans of the relevant higher and further education providers, with the need determined by the level of student growth planned for by the individual universities over and above that planned for through the OAN. On this basis, the Plan seeks to ensure that the provider delivering the growth and resultant demand for student accommodation delivers the required student accommodation.

3.2.6 This approach reflects and compliments the need for student housing as detailed in the Council's answer to 3.1 above.

3.3 Is Policy H7 reasonable?

3.3.1 Yes, Policy H7 is reasonable. It sets out a positive framework for the delivery of student housing where need is demonstrated. It also clearly articulates the criteria by which any proposals will be assessed, addressed in line with NPPF 2012, paragraph 154 which requires policies to be clear for decision making.

3.3.2 The Plan sets out the broad policy approach that will apply to the largest institutions and requires:

- University of York to address needs of student on campus first instance, and beyond, with further details included in ED1, ED2, ED3 and SS22/site allocation ST27; while
- York St John's University are required to meet needs off campus, but in close proximity with Site allocation SH1 and Policy ED5 supporting this approach.

3.3.3 Policy H7 provides that, in assessing need, account can be taken of capacity of independent providers and the Council recognise that University's as public sector institutions will need to consider the economics of provision (on site or accessing independent providers), in the context of overall estate strategies.

3.3.4 The locational requirements help ensure that student accommodation is in accessible locations that minimise the need to travel, while providing the University's with an appropriate level of flexibility in delivery. The impact on amenity of neighbours is recognised and controlled with a requirement to ensure the design and access arrangements have a minimal impact on the local area.

3.3.5 The Sustainability Appraisal [CD008] sets out at 6.616 that the implementation of Policy H7 (Student Housing) will help to meet the housing needs of students where there is a proven need while 6.619 considers that the implementation of policies H1, H2, H3, H4 and H7 would help to deliver a significant amount of new housing within York.

3.3.6 Table J.2 'Effects of Housing Policies H1-H10' within Appendix J of the Sustainability Appraisal Table [CD009c] provides a detailed assessment of H7 against the 15 identified SA objectives. In particular Policy H7 supports the development of new student housing where it is accessible by sustainable transport modes, which would have positive effects on this objective.

3.3.7 The Sustainability Appraisal [CD008] concludes that the housing policies, including H7, would help to deliver a significant amount of new housing over the Plan period, would ensure that there is a good mix of different types of housing developed and would ensure this housing is affordable and meets need. All of the various measures in this policy would help to meet the diverse

housing needs of York's student population and have significant positive effects.

- 3.3.8 When read in conjunction with the specific education policies ED1-5 and ED7, and SS22 as detailed above, the policy provides a clear and reasonable approach to guide the delivery of student housing.

3.4 Will it adequately address the need for student housing?

3.4.1 Yes. Policy H7, in combination with other relevant policies ED1-5, ED7, and SS22 as well as site allocations ST27 and SH1 adequately address the need for student housing.

3.4.2 H7 sets out a positive, flexible and broad framework for the delivery of student housing. It ensures that the need for student housing, driven by the growth and expansion plans of the relevant higher and further education providers, is addressed by the provider themselves, while acknowledging the role of independent providers of such accommodation.

3.4.3 See the answer to 3.3 above.

3.5 Is allocation SH1 soundly based and sufficient?

- 3.5.1 Yes. Policy H7, ED4 and ED 5 acknowledge York St Johns growth ambitions and recognise the need for additional student housing to support this. The policy acknowledges that the existing campus has constraints in delivering this requirement on-site. Policy H7 and ED 5 allocate SH1 as land for student housing for York St John University. Policy ED4 also recognises that consideration will be given to the capacity of independent providers of student accommodation in the city, providing flexibility to the policy.
- 3.5.2 This site should deliver high-quality, purpose-built student accommodation. This allocation builds on the requirement expressed in H7 that York St John must address the need for any additional students which arise because of their growth and expansion plans.
- 3.5.3 SH1 has been assessed in the Sustainability Appraisal 2018 [CD008] as having a positive effect on SA Objective 1 (Housing). Significant positive effects were assessed for SA Objectives 2 (Health), 3 (Education), 5 (Access to Services) and 6 (Reducing the Need to Travel), recognising the site's location close to a range of services and facilities.
- 3.5.4 Appendix K Part 3- All Sites Audit Trail [CD009c]also includes reference to SH1 and states that SH1 passed CYC site selection criteria and represents a site suitable for specialist housing. It has a developable site area of 1.69 hectares.
- 3.5.5 It is considered that the allocation is sound and sufficient to deliver student housing related to future growth and expansion at York St John.

3.6 Is the manner in which Policy H8 approaches HMOs justified?

- 3.6.1 Yes, the policy takes a managed and appropriate approach to HMO's. The policy recognises the important contribution HMOs make to York's housing offer, providing flexible and affordable accommodation while seeking to ensure that communities and neighbourhoods do not become imbalanced.
- 3.6.2 The Council issued an Article 4 Direction, which came into force on 20 April 2012 to remove the permitted developments for a C3 dwelling house to change to a C4 small HMO without the need to apply for planning permission. The direction covers the main York urban area (Direction and Map at Appendix 1). Planning permission is therefore required for such a change of use.
- 3.6.3 Policy H8 supports the delivery of the Article 4 direction. HMOs are a vital source of accommodation within the city, used by a range of tenants and therefore the policy seeks to continue to provide HMO accommodation to meet the city's housing needs, but to manage the supply of new HMOs to avoid high concentrations within specific areas.
- 3.6.4 This policy approach is supported by an effective public transport provision and the compact nature of the City generally, which ensures HMO's, particularly for students, remain accessible while managing the spread and location.
- 3.6.5 There are three elements to the policy:
- a threshold assessment at the neighbourhood level (20%):
 - a threshold assessment at the street level (10%): and
 - an assessment of residential amenity.
- 3.6.6 This allows an analysis of the HMO's within the vicinity of an application and planning judgement to be applied when considered against the requirements.
- 3.6.7 A draft 'Controlling the Concentration of Houses in Multiple Occupation Supplementary Planning Document Approved (April 2012, amended July 2014)' was approved in 2012. This supports Policy H8 and is attached at Appendix 2.
- 3.6.8 The supporting text to Policy H8 states that the SPD provides guidance on how planning applications will be determined. The SPD references Policy H8 and the threshold approach and provides more detailed guidance on how applications will be determined. Taken in conjunction it is considered that Policy H8 and the SPD provides a justified and suitable framework for the management of HMO's within the City.