

Examination of the Bath and North East Somerset Local Plan (Core Strategy and Placemaking Plan) Partial Update

Matter 4: Area Policies & Allocations

SB19 The University of Bath, Claverton Down (including the Sulis Club) and Policy B5 Off-Campus Student Accommodation and Teaching Space

Prepared on behalf of

University of Bath

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1 CONTEXT

- 1.1.1 The quality and beauty of the Claverton Campus is an essential part of the University's identity and appeal to students, staff and partners alike. Its further development and on-going management is, therefore, central to enabling the University's sustainable growth and ensuring that it continues to play its essential socio-economic role in the city and wider region.
- 1.1.2 Consequently, following the adoption of the Placemaking Plan in 2017, the University has collaborated with the Council to prepare a new Masterplan for the campus that responds to the opportunities and constraints set out in the extant Policy SB19. The Masterplan has been prepared through an iterative assessment and design process and it robustly establishes the capacity for the further development of the campus without compromising its environmental quality.
- 1.1.3 The new Policy SB19 is critical to facilitating the implementation of the Masterplan. It provides clarity and certainty for all stakeholders by establishing a robust policy framework for the long-term development of the campus. Notably, it sets clear parameters and principles for the consideration of future planning applications in relation to the location and scale of built development elements, the nature of the supporting infrastructure required to facilitate the development, and the protection and enhancement of the Green Infrastructure network.
- 1.1.4 Further detail is set out in the Statement of Common Ground that has been agreed between the two parties.

2 SCALE AND MIX OF DEVELOPMENT (Q39)

- 2.1.1 The University was established by Royal Charter in 1966 to "*advance learning and knowledge by teaching and research*". It makes a significant impact nationally, regionally and locally. In 2019/20, BiGGAR Economics calculated that the activities of the University of Bath supported:
- £380 million Gross Value Added (GVA) and 5,900 jobs in Bath and North East Somerset;
 - £440 million GVA and 6,700 jobs in the West of England Combined Authority area; and
 - £1.2 billion GVA and 12,100 jobs in the UK.
- 2.1.2 Whilst currently in the top ten in the major national university league tables, the University recognises that student expectations are increasing, most recently around extra-mural facilities and wellbeing support. Even without growth in its academic portfolio and student numbers, there is pressure for the University to develop campus services and facilities to maintain its success. Moreover, education itself is a dynamic sector, with new technologies and pedagogical approaches creating demand for additional specialist teaching facilities.
- 2.1.3 The University receives public funding and is responsive to Government priorities. The Government's 2021 update to its [International Education Strategy](#) reaffirmed its ambitions to increase the value of the UK's education exports to £35 billion per year and the number of international students hosted in the UK to at least 600,000 per year. "*We know our*

businesses are facing skills shortages and needs are going to grow given the pace that technology and industry keeps changing at." Minister for Higher and Further Education, Michelle Donelan, November 2021. The University plans to contribute to the Government's international student recruitment targets, and review its strategy for apprenticeships/flexible delivery modes (which do not require residential accommodation during semester time).

- 2.1.4 In March 2021, the Government published its plan for growth, [Build Back Better](#), referencing skills and innovation. The University seeks to contribute and, thereby, support economic recovery from Covid-19 and the transition to Net Zero, as well as addressing other Global Challenges through its research.
- 2.1.5 The recently published results of REF 2021, a national evaluation of research quality, suggest a correlation between size of research unit and success of outcome in at least one of our key disciplines. Scale is also likely to be a success factor in an increasingly competitive research funding environment. The University needs to increase its research power (numbers of researchers) to assure the sustainability of its research base. The new research facilities to support research power growth will not create demand for additional PBSA.
- 2.1.6 The University needs certainty about its future capacity to create new teaching and research infrastructure to provide assurance before it commits resources to the development of, and recruitment for, new provision. Whilst the lead times for new provision are significant, the lead times to decant existing activities from ageing 1970s buildings to tackle legacy asbestos issues are even greater because of the complexity of the business continuity challenges. Decant capacity on campus is essential as many of the original buildings now require major refurbishment, and investment to move towards Net Zero.
- 2.1.7 The Claverton Masterplan seeks to enable the delivery of the development and infrastructure that is required to relieve current space pressures, meet future needs arising from its continued growth as and when required, and to ensure that the teaching and research environment provided is of the highest quality as befitting of a leading University.
- 2.1.8 It is a capacity based plan and its preparation has been informed by a suite of detailed assessments that provide a clear understanding of the key environmental constraints and the required design response to them; notably in relation the Eastern Playing Fields that were removed from the Green Belt in the 2007 Local Plan (albeit remaining in the AONB) specifically to allow the further development of the Campus. In doing so it demonstrates how the further redevelopment and new development on Campus can be achieved to meet potential future needs, whilst also enhancing the environment for students, staff and visitors.
- 2.1.9 The scale of development referred to in the new Policy SB19 reflects the capacity robustly established through the Masterplanning process.
- 2.1.10 The indicated mix of development is an appropriate response to the current Policy SB19 that requires a balanced mix of all University related uses and reflects the University's and Council's strategic priorities. It reflects that much of the University's future development requirements must be provided on campus so that they are co-located with the existing facilities. It is also

a direct response to the specific campus constraints and opportunities for future development (for example, see para 6.1.8 below).

3 LAND USES (Q40)

- 3.1.1 The land uses listed in criterion 1 are simply taken from the extant Policy SB19 in the adopted Placemaking Plan (Part 1 Purple Zones).

4 BUILDING HEIGHTS (Q41)

- 4.1.1 During the preparation and refinement of the Masterplan, the Council requested a detailed appraisal of the potential visual impact of the emerging Masterplan proposals. That culminated in the preparation of a “Verified Views Appraisal” that tested the position and scale of proposed building blocks when viewed from key locations in the surrounding area.
- 4.1.2 In terms of the building heights specifically, robust assumptions were derived from recent developments on the campus with the required building plant also added. The building blocks were then applied to a base height extrapolated from a topographical survey. The appraisal effectively represented the “worse-case” as it does not take account of the proposed strategic planting that will be provided or the further mitigation that will be provided through the detailed design of the buildings at the application stage.
- 4.1.3 The appraisal and consultation with the Council’s officers allowed appropriate building parameters for the proposed buildings to be established, and they are now enshrined in Policy SB19. Policy SB19 is, therefore, justified and will be effective in controlling the height of new development within the campus and mitigating any potential visual impact on the wider area.

5 SPORT AND RECREATION PROVISION (Q42)

- 5.1.1 The extant Policy SB19 accepts the principle of development on the Eastern Playing Fields and paragraph 236 explains the context. The tests in paragraph 99 of NPPF reflect the provisions of previous iterations of Government policy that were in place at the time that the 2007 Local Plan and Placemaking Plan were prepared and these matters were previously considered.
- 5.1.2 The Sports Facilities Background Paper sets out the analysis of the existing pitches (quantity and quality) and the capacity and benefits of the proposed new facilities that informed the preparation of the Campus Masterplan. Reflecting that, the new Policy SB19 (and the University’s Masterplan) proposes that a substantial element of the proposed PBSA on the campus be accommodated on two undersized grass pitches to the east of the Sports Training Village. The rest is to be accommodated on the car park to the north of them. To the south, a new 3G pitch and basket/netball facilities are to be provided where there is currently a full sized grass pitch and a junior grass pitch.
- 5.1.3 These grass pitches are unlit so they cannot be used in the late afternoon or evening during most of the student year (October to April). Moreover, the Campus geology (thin top soil with

narrow sub-soil on clay) means that the pitches drain very poorly. Consequently the records show that most pitches are not used more than twice a week to try to ensure that they remain playable. However, despite that they are frequently unusable in the winter months during key parts of the season.

- 5.1.4 This also means that these pitches are not available for regular commercial bookings. Indeed, the University has reduced informal community use over recent years as student numbers have increased.
- 5.1.5 The two undersized pitches are used for the Inter-Departmental Football Competition. This is a popular, recreational activity for which these pitches are of an adequate size and quality. The intention is that the capacity provided by these pitches is retained through the reconfiguration of the pitches on the Lime Kiln fields.
- 5.1.6 The full-size pitch is used for competitive student matches, primarily American Football. The records show that annual usage is 100-120 hours. The junior pitch is no longer used as it is too small. Indeed, it is no longer even marked out as a pitch.
- 5.1.7 A full-size, floodlit 3G pitch would enable a substantial increase in sporting activity. The pitch would be available to use 97 hours per week. During the student term, the pitch would be used for at least 80% of this time given the very strong unmet demand from five student clubs: football, rugby (union, league & touch), ultimate frisbee, lacrosse and American football. Existing bookings for these sports would be transferred from the 2 existing astro pitches, so creating increased availability for hockey too. In total, 27 University teams will benefit from an increase in training and match provision.
- 5.1.8 A detailed analysis has indicated that there is unmet demand of 112.75hrs per week from the 5 sports clubs using grass pitches and 44 hrs per week from the hockey club. This demand is spread across the week, particularly during early mornings, lunchtimes, late afternoons and throughout the evenings.
- 5.1.9 The proposal also includes providing a new, completely additional MUGA comprising two netball courts and one basketball court. This would provide a significant additional asset.
- 5.1.10 A planning application for the 3G pitch and MUGA is currently being prepared and initial discussions have been held with the Council in relation to a Community Use Agreement that would ensure community access to them during weekends and outside of student term time. The new facilities will also enable community access to the other external facilities, including hockey and football on the existing astro pitches, to be increased.
- 5.1.11 Whilst there would unfortunately be the loss of some grass pitches on the campus, it is clear that is necessary in order to realise the wider objectives in relation to PBSA provision on the campus and, indeed, is acceptable in principle under the terms of the extant Local Plan policy. However, the limited loss of relatively low quality pitches will be more than compensated for by the proposed provision of the new 3G pitch and MUGA in terms of actual capacity (useability), quality and accessibility.

- 5.1.12 The proposals embedded in Policy SB19 will, therefore, effectively provide a substantial and sustained sporting benefit for both students and the local community and accord with the requirements of the NPPF.

6 AONB (Q43 & Q44)

- 6.1.1 There is a statutory duty (Section 85(1) of the Countryside and Rights of Way Act) to have “*regard to*” the purpose of conserving and enhancing the natural beauty of the AONB. Consequently, the NPPF requires “*great weight*” to be given to that in the planning process and continues to state that the scale and extent of development should be “*limited*”. The AONB is, therefore, a very important consideration when considering the future of the campus, but clearly neither the Act or the NPPF preclude development in the AONB. Nor does the NPPF precisely define what scale and extent of development might be appropriate. Therefore, these matters must be considered within the specific context of what is proposed and where.
- 6.1.2 Within the Masterplan and the new Policy SB19, the proposed PBSA is to be located on the eastern playing fields and car park to their north that are located within the AONB. This area, however, comprises only a very small part (2ha) of the wider Cotswold AONB (over 200,000ha) and the scale and extent of the proposed development is effectively contained by the landscape framework of the campus.
- 6.1.3 Moreover, this part of the campus no longer reflects the character of the wider AONB, and indeed, make a very limited (if any) contribution to its “*natural beauty*”. That was recognised by the Inspector in the context of the 2007 Local Plan, who also concluded that there were “*exceptional circumstances*” for redefining the Green Belt and allowing University related development within the AONB (refer to para 232 of the Placemaking Plan that sets out the historical context).
- 6.1.4 That was subsequently reflected in part 2 of the extant Policy SB19 that states that “*... University related development is also acceptable in principle*” in the hatched purple zone on the Policy Map that includes the Eastern Playing Fields and the car park (but also the tennis courts where development is no longer proposed). The policy continued to require the preparation of an evidenced Masterplan to effectively manage the development in the AONB and to ensure impact on the wider AONB is comprehensively considered. Moreover, part p of the “*Area Specific Principles*” states that development on the Eastern Playing Fields should be “*landscape led*” and “*pay particular regard to the impact on development on SAC bats and views from the wider Cotswold AONB*”.
- 6.1.5 The Campus Masterplan that has been prepared by the University in collaboration with the Council is founded on a robust evidence base (notably including a detailed Landscape and Environmental Management Plan) and has addressed the requirements of the extant Policy SB19 in this regard. The new Policy SB19 reflects the Masterplan and its Green Infrastructure (landscape) Strategy and establishes a robust policy framework that will provide clarity and greater certainty for all stakeholders going forward.

- 6.1.6 The Masterplanning process has clearly established that the limited and finite development capacity remaining within the campus is within the existing surface car parks and the eastern playing fields. Consequently the Masterplan is comprised of inter-related building, parking (multi-storey provision) and sports infrastructure (3G provision) strategies that seek to allow that capacity to be realised without compromising the day to day functioning of the campus or its environmental quality.
- 6.1.7 The PBSA is located in the eastern part of the campus because its built form (as opposed to teaching or research facilities) can be more easily designed to provide an appropriate response to the sensitive edge of the campus and the wider context (in terms of the bat corridor and AONB). The Quads located to the north of the East Car Park provide an excellent precedent that clearly demonstrates how effective the configuration of the built form of the PBSA (narrow blocks “facing” the AONB, with a varied building line and control of heights) together with a robust landscape scheme can be in minimising the potential impacts on the wider area and enhancing landscape character within the campus.
- 6.1.8 Part 2 of the Policy SB19 relates specifically to this PBSA development. It embeds the required primary mitigation established through the iterative assessment and design process that has been undertaken in preparing the Masterplan within the terms of the policy itself. In doing so, it effectively limits the extent and scale of what is proposed in the AONB by defining a 3d envelope within which the PBSA development must fit and stating what further landscape enhancements are also required. That is also reflected in Part 7 of the policy which relates to the Green Infrastructure framework as a whole and the landscape enhancement that is to be provided.
- 6.1.9 The “General Development Principles” section of the policy sets out specific clauses that have retained from the original Policy SB19. Part (d) refers to a requirement for a Landscape and Visual Impact Assessment at the application stages, the moderation of any visual impact within the AONB through design and the provision of robust mitigation. Part (j) also refers to minimising the impact of lighting on the AONB.
- 6.1.10 Moreover, the Development Plan must be read as a whole when determining planning applications. The LPPU includes the addition of clause 4 to Policy NE2 in the context of the statutory duty (as set out in paragraph 249a) to ensure that “*great weight*” is afforded to the AONB and its special qualities in accordance with the NPPF.
- 6.1.11 Therefore, it can be concluded that the extent and scale of development on the AONB would be relatively limited in its specific context and will be limited by the provisions of the policies within the LPPU. The LPPU, therefore, accords with the requirements of the NPPF and will be effective in conserving and enhancing the landscape and scenic beauty of the AONB and enhancing the environment in terms of landscape effects.