

LOCAL PLAN PARTIAL UPDATE REGULATION 19 SUBMISSION DRAFT REPRESENTATIONS

POLICY SB19: UNIVERSITY OF BATH AT CLAVERTON DOWN

Introduction

The University of Bath (“the University”) is a major driver of social mobility, opportunity and economic growth in the City and wider region. The Local Plan should play a critical role in supporting its continued success and sustainable growth through the provision of a positive planning policy context that allows the expedient determination of future planning applications for key investments planned on the campus, and to realise potential off campus development opportunities, to address its development requirements. The recognition of the University’s role (paras. 229a-229c) and the review of Policy SB19 that relates to the University’s Claverton Campus in the Local Plan Partial Update (LPPU) is, therefore, very much welcomed.

The University has prepared a new Masterplan that provides a vision of the future for the Claverton Campus in collaboration with Bath & North East Somerset Council (“the Council”). Its purpose is to enable the delivery of the development and infrastructure required to address the needs and expectations of its students and staff, and to facilitate the University’s sustainable growth, in a manner that also enhances the unique beauty and environmental quality of the campus. An explanation of the Masterplan is provided in the “The Claverton Masterplan: Masterplan Report 2021” (August 2021).

The Masterplan, and the detailed assessments that have informed its preparation, form part of the evidence base for the review of Policy SB19. Indeed, the new policy closely reflects the strategies that underpin it and the specific proposals that will realise the quality of environment that both the University and Council aspire to.

The University, therefore, largely supports the aspiration and terms of the new Policy SB19. However, it does object to some specific elements of the policy for the reasons set out below.

The University

The University of Bath has around 19,000 students and has been ranked in the top 10 of UK universities in all of the most recent major, national league tables. Whilst its activities are primarily located on the Claverton Campus at Bath, it also has premises in the city centre, research facilities in Swindon and a major new research facility under construction on the Bristol and Bath Science Park.

It is a leading, research-intensive university with a reputation for excellence, and has a track record of working in partnership with business, the public services and the voluntary sector. It has great academic expertise in science, technology, engineering, mathematics, social sciences and management, including discipline areas which are a focus for the West of England Local Economic Partnership (LEP). The education the University provides improves individual life chances and opportunities, and delivers highly skilled industry-ready science, social science and engineering graduates to the workplace.

The University’s growing research portfolio generates significant opportunities for investment and employment assisting the area’s economic development, notably through the creation and growth of knowledge-based, high value-added companies. Indeed, the University’s successful business incubation role, as part of the SETsquared consortium, is renowned globally. UBI Global, a leader in performance analysis of business incubation, ranked SETsquared (the enterprise partnership of UK universities to which the University belongs) as the best university business incubator in the

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world. It has helped 1,000 technology start-ups to development and has raised more than £1 billion in investment.

Its research also makes a significant contribution to our society and day to day lives, notably in addressing the challenges of Climate Change:

- Work in the Faculty of Engineering and Design has been shown to have led to reductions of more than 200,000 tonnes CO₂/annum from more efficient car engines (equivalent to removing over 100,000 cars off the road each year), of 575,000 tonnes/annum from more efficient electricity networks, and of 1,200 tonnes/annum from improved aerospace parts.
- Research feeding into four huge gas turbine engines built and sold by Siemens will lead to a 3,000 tonne reduction in emissions by each engine per annum over their anticipated 20 year operational lifetime.
- Work in the Department of Economics has led to a commitment to replace 18,000 diesel vans with electric models by 2028.
- Research at the University has tested and certified new low carbon construction materials that reduce energy bills for homes by 90%, and improved the understanding of construction materials to flood resilience.

Combined these savings are more than 100 times the total recurrent emissions from the University and greater than the entire emissions from B&NES.

The University has a very significant direct economic impact as a core part of the City's economic infrastructure, directly generating substantial economic activity, employment opportunities and investment.

A recent study conducted by Bigga Economics showed that the activities of the University support:

- £370 million Gross Value Added (GVA) and 5,800 jobs across the Bath and North East Somerset;
- £440 million GVA and 6,600 jobs across the West of England Combined Authority area; and
- £1.2 billion GVA and 11,500 jobs across the UK.

Notably, it is a major and very stable employer with around 3,400 staff. Bigga Economics estimated that its operational and purposeful activities support 1 in every 19 jobs in Bath and North East Somerset, and a further 1,500 jobs in the UK as a whole.

The University also provides access for the local community to sports, social and recreational facilities on the campus, and interacts further with the community through outreach activities, including mentoring schemes with local schools, and students' fundraising and volunteering activities.

University Strategy 2021-2026

The University has recently approved its new University Strategy covering the period 2021 to 2026. It is setting out to build on its leading performance at national level in order to gain recognition as an international centre of research and teaching excellence, become more agile in its response to the rapidly changing local, national and global environment, whilst consolidating its strengths and advancing its activities in scale and impact.

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It will prioritise maintaining its strong performance in student satisfaction and employability at both undergraduate and postgraduate levels, focus on developing internationally leading courses with new teaching delivery options and course pathways, and harness the opportunities emerging technologies bring to enhance its existing provision and its ability to reach new and diverse audiences. Building on its existing online provision, it will develop sustainable online learning resources to provide quality distance learning and enrich and enhance the efficient delivery of courses. It will also continually strive to enhance facilities and infrastructure (notably on campus) to support an excellent educational and wider student experience.

The University is aware of its responsibility to contribute to the global good. It has identified three areas of research strength and focus: Sustainability; Health & Wellbeing; and, Digital. These strengths not only respond to international imperatives, such as the United Nations' Sustainable Development Goals, but also align tangibly with regional and national priorities and the UK's Research & Development Roadmap.

The University's research expertise is also contributing to four pressing areas on the agenda for the Council, as part of a new, partnership working initiative called Our Shared Future. It will address the aspects of major global challenges brought by Bath's status as a UNESCO World Heritage City: climate change; infrastructure; digital democracy, and travel and transport.

The University will grow its research capacity and academic leadership for further success. Key to achieving its ambition is the generation of increased research income to fund innovation, exploration of new areas and investment in new research infrastructure.

Challenges and Opportunities in 2021 & Beyond

In developing the new University Strategy, the University has taken account of the economic, political, societal and technological context and the uncertainties that the Higher Education sector will need to navigate. These include the impacts of the Covid-19 pandemic and recovery in the post-Covid era, the changing relationship between the UK and EU and evolving global trade and industry relationships, a transforming digital landscape and the need to respond to the imperatives of sustainability, diversity and inclusion. For Higher Education Institutions, both the global and national landscape is rapidly changing, due in part to increased international competition and complexity, evolving policies in the UK, and pressures on university finances. The recent past has underlined the need for increased agility.

Over many years, the University has seen great success in attracting highly achieving applicants, despite the demographic changes causing reductions in the numbers of school-leavers in the UK. Student recruitment in the Higher Education sector has been impacted by Covid-19, with reduced international student numbers at undergraduate and postgraduate level, and increased numbers of Home applicants for undergraduate courses achieving their offer grades following 'A' level grade inflation in 2020 and 2021. Looking forward, the demographic reduction of school leavers in recent years is reversing suggesting that there is likely to be growing numbers of potential undergraduate applicants to the University in the coming years.

The University is unclear as to when any degree of stability will return to its student recruitment markets and to how the impact of Covid, Brexit and other policy changes will impact its cost base. This increases the challenge of forecasting future student numbers and assessing the demand for new facilities. The University will be closely monitoring the balance between sandwich/placement and full-time students to identify any emerging pressures on its campus facilities, for example, resources to support final year project work.

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Recognising the finite capacity of both the Campus and the City, the University has also sought to accommodate growth in ways that do not generate demand for residential accommodation in the area. The 2018/19 academic session saw the launch of the University's first Master's level (Level 7) degree apprenticeship. This is delivered using a variety of distance-learning techniques and the apprentices are only required to attend Campus periodically for face-to-face, one-day Masterclasses. The University has also partnered with Wiley Global Educational Services to develop a range of online programmes, the first of which was launched in 2019. The online provision does not require any campus attendance and is a rapidly growing market for the University.

The new University Strategy 2021-26 continues to support the development of online provision and innovative delivery models, including degree apprenticeships.

Climate Action Framework

In May 2020 the University declared a climate emergency and adopted a Climate Action Framework that addresses the University's climate impact as an organisation, and sets out how it can impact the agenda through its core mission; research, and teaching and learning.

The University has an important role to play in conducting world leading climate emergency related research and in educating students to become future leaders and innovators with the skills and experience to respond to the climate crisis. It has demonstrated that the impact of its research on the climate change agenda is much greater in scale than that which can be achieved by local actions. Nonetheless, as an organisation, it has committed to the ambitious targets of being Net Zero Carbon in its Scope 1 and 2 emissions by 2030, and being Net Zero Carbon in its Scope 1,2 and 3 emissions by 2040. This will require it, in common with other organisations, to significantly increase the pace and ambition of current actions to meet the challenge of transitioning to a net zero carbon campus, alongside supporting behavioural and cultural changes through engagement with its own community.

Estates Strategy

The unique character and quality of the Claverton Campus is an essential part of the University's identity and its appeal to students, staff and partners alike and its effective management and development is central to ensuring that their expectations are met.

The University's estates strategy, therefore, focusses on the capacity, quality and sustainability of its physical estate. As a result, the capital programme in recent years has sought to balance projects that create new capacity, for example, the Milner Centre (non-residential) and Polden (residential), with those that improve the quality and sustainability of existing buildings, for example, the refurbishments of 1West (non-residential) and Westwood and Woodland Court (residential).

The core buildings around the Parade were constructed in the late 1960s or early 1970s when asbestos was commonly used in construction materials. Buildings that still include these materials are increasingly difficult to service and offer little opportunity for re-configuration to address changing pedagogical demands because of the need to manage the asbestos safely. The University is systematically refurbishing these older buildings. It started with the 4 West building and more recently has refurbished the 1 West building. The next two buildings that the University needs to refurbish for business continuity reasons are 3 West and 5 West. However, the required capital programme is complex, particularly given the specialist nature of much of the space, the number of inter-dependencies and the requirement for the prior provision of decant space.

One of the key priorities in the new University Strategy is to increase the research portfolio. The University has over recent years been successful in attracting large, multi-million pound research grants, which have been accommodated through re-allocation of existing space. However, further growth in research income is likely to require additional research space if the nature of the research

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is such that it needs to be co-located with existing research facilities, or draw upon existing technical support. The Milner Centre is a research building that illustrates very clearly how not all academic investments on Campus have associated growth in student numbers. The University is also seeking opportunities to create off-Campus research facilities with sufficient critical mass to stand alone. The new Institute for Advanced Automotive Propulsion Systems at the Bristol and Bath Science Park, and the Innovation Motion Capture Studio in the Bottle Yard Studios in Bristol are examples of this approach.

Another key priority of the new University Strategy is to enhance the student experience. The table below provides benchmarking information using data published by the Higher Education Statistics Agency (HESA). Given the University's high proportion of Science and Engineering provision, with the consequent need to provide both specialist teaching and research laboratory space, it should have a higher than average space allocation per full-time student, but it is apparent that is far from the case:

University	Non-Residential GIA per Full Time Student							
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
The University of Bath	11.9	12.4	12.4	12.8	12.1	12.8	12.3	11.3
The University of Bristol	19.4	20.7	19.5	19.3	18.4	17.7	17.2	15.8
Cardiff University	16.3	15.7	15.6	15.5	14.7	14.7	14.4	14.7
University of Durham	12.5	12.4	12.1	11.6	11.4	11.4	12.4	12.2
The University of Exeter	11.0	11.1	10.3	9.7	9.7	9.5	9.3	9.0
The University of Lancaster	14.2	13.5	14.3	13.9	13.5	12.9	12.5	11.6
The University of Warwick	19.1	19.0	20.0	20.4	17.0	17.7	18.4	17.1
The University of York	15.2	14.9	15.0	15.3	15.6	17.7	17.2	16.9

Indeed, the quality and quantity of study spaces on campus have been on the Students' Union top ten issues list for the last two years. Excessive pressure on study spaces, retail outlets, sports facilities and the like can have a significant impact on student satisfaction, which then feeds into the National Student Survey (NSS) scores that in turn feed into subject and university league tables and form part of the evidence base on which applicants rely to inform their choice of institution.

Therefore, in order to meet demand from its existing students, the University needs to ensure that it can deliver enough study spaces across the Campus and in the Virgil Building in the city centre, whilst recognising the need to support Higher Education sector campaigns to provide additional student mental health support. Some of this incremental demand can be met from re-purposing existing space but periodically there needs to be a step change in the quality or quantity of facilities in order to address student feedback. For example, the University opened a new (second) gym in 2019 to reflect the fact that its existing capacity was not adequate to meet the demand from students, and is leasing property in the City, Dartmouth Avenue, to accommodate some of the clubs and societies run by the Students' Union.

Whilst the University would ideally like to retain all of its grass pitches, it recognises that some compromise is necessary in order to create the development opportunity for new academic facilities and Purpose-Built Student Accommodation (PBSA) on campus. In order to replace the team sport capacity that will be lost to create these development opportunities, and to accommodate increasing demand, it is essential that we create a new 3G pitch. Our 14 existing full-size grass pitches and 5 junior pitches are well maintained but in order to retain their quality throughout a season, they are only used twice a week for matches. A number of pitches drain poorly due to the underlying clay rock and this, coupled with our exposed hilltop location, means that a number of our pitches are often unusable for several weeks in the depth of winter. A 3G pitch facility with lighting could be used for up to 94 hours per week and

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would be better suited to the needs of many team sports including football, rugby (union, league, and sevens), lacrosse, American football and ultimate frisbee. Many students choose to come to the University because of its strong academic reputation combined with an outstanding opportunity to develop their athletic career or simply to use the excellent facilities. The University also sees the provision of sports facilities as part of its broader wellbeing offer for students.

The University is conscious of the demand it places on residential accommodation in the City. It also has limited development capacity on campus. The University has been working in collaboration with the Council to achieve a balance between its academic development capacity and its residential development capacity. The Campus Masterplan indicates that the University could accommodate between circa 44,000m² and 48,000m² of academic, research and support space and 830-870 student bed-spaces. The University works closely with the Students' Union to identify trends in student accommodation needs.

Looking forward, therefore, it is clear that continued investment in refurbishing the ageing buildings on the Campus and the creation of new facilities on and off Campus are required to ensure that the teaching and research environment provided is of the highest quality as befitting of a leading University and to meet future needs arising from its continued success and development.

The Claverton Masterplan

The Claverton Masterplan establishes a comprehensive vision for the enhancement and further development of the campus and is comprised of complementary building, movement, sport and green infrastructure strategies. It directly addresses the estate strategy and priorities outlined above by enabling the delivery of the development and infrastructure that is required to relieve current space pressures and meet future needs as and when required. Consequently, the University has sought to ensure that it provides for an appropriate balance of academic, research and support facilities that must for operational reasons be co-located on the campus within the existing facilities and PBSA to accommodate future growth in student numbers, whilst also protecting the environmental quality of the campus.

Whilst a significant amount of development has taken place in recent years, there are still opportunities for conversion, redevelopment and extensions to the built form in the campus core. A number of those opportunities were identified in the previous campus masterplan and have been retained in the new masterplan. They functionally relate well to the existing academic and support facilities and are required to facilitate the rolling programme of refurbishment of some of the older building stock, the requirements for decant space in that regard, and also address qualitative issues in relation to some of the existing support facilities as set out above.

The potential for converting and repurposing some of the existing building stock will also be kept under review. For example, a reduction in the need for general administrative space on the campus as a result of, amongst other things, increase homeworking could in the future allow the return of Wessex House back to its original use as student residencies.

Beyond those opportunities, the Development Framework in the current Policy SB19 in the PlaceMaking Plan (PMP) indicates that the remaining development capacity on the Campus is located on the existing main car parks and/or sports pitches and courts (outside of the Green Belt). In either case the development of these areas would first require the appropriate re-provision of these facilities elsewhere within the estate.

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The Masterplan, therefore, proposes the provision of multi-storey (decked) car parks (MSCP) on both the West and South Car Parks. These areas are well located close to the main vehicular entrances to the Campus meaning that the majority of traffic would then not need to enter its core. The provision of these MSCPs would, in due course, allow the release of the East Car Park and the overflow car park for built development without necessarily requiring a reduction in overall parking numbers across the Campus (albeit that may well be an objective going forward in light of the CAF). The University already has an effective Travel Plan in place, but the Masterplan also highlights the opportunities to enhance the capacity and operation of the Bus Arrivals Plaza, and to also improve the pedestrian and cycle routes and facilities in and around the campus.

The Eastern Playing Fields and tennis courts area were removed from the Green Belt in the 2007 Local Plan in order to allow the development required to support the University's growth. They are, therefore, also included within the Development Framework in the extant Policy SB19 as a location for built development, along with the lacrosse pitch.

However, the lacrosse pitch and the (recently improved) tennis courts would need to be replaced elsewhere on campus and, given their position close to neighbouring residences, the Masterplan proposes to leave those facilities in situ. The grass pitch provision on St John's Field and Lime Kiln Field in the southern part of the campus will also be retained. The Masterplan does, however, include the provision of a 3G pitch on the Eastern Playing Fields adjacent to the existing all-weather pitches, where it would be functionally well related to the Sports Training Village and the changing facilities, physio and support facilities. The provision of the artificial pitch would significantly increase the capacity of the pitch provision across the campus as it can be used more flexibly and intensively and address the growing demand for these facilities.

The 3G pitch provision then allows the release of grass pitches in the Eastern Playing Fields for the development of PBSA close to that development proposed on the East Car Park and Overflow Car Park.

A key aspiration of the University has always been to protect the environmental quality of the campus and remain a diligent custodian of the landscape. The retention of St Johns field at the main entrance and the landscaped setting around the campus boundaries is critical to that. As is the University Park in the centre of the campus and there are opportunities to enhance that to improve its functionality and the setting it provides to the buildings, but also to improve the connections to the wider Green Infrastructure network.

The University recognises that the developments will need to be sensitively designed to take account of the landscape, visual and ecological (notably bats) matters on the campus. Detailed assessment work has, therefore, been undertaken to refine the proposals within the Masterplan. That has focussed on defining the key parameters in terms of the extent and scale of the proposed built form (in 3 dimensions), particularly relative to the landscaped boundaries of the campus, and the development of a Green Infrastructure Strategy that will enhance the overall environmental quality of the campus.

That has allowed the potential development capacity of the Masterplan to be robustly tested (albeit that will always be subject to the detailed design). That testing has indicated that the development opportunities identified around the University core, on the East and West Car Parks, and on Eastern Playing Fields, could accommodate between circa 44,000m² and 48,000m² of academic, research and support space and 830-870 student bed-spaces.

It is important to understand that the Masterplan is a capacity based plan to address potential long term needs. It is not one that has been developed in response to specific development needs that

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have been clearly identified by the University at this stage. Consequently, there is not a defined phasing plan and programme at this time. Indeed, the delivery of the individual elements of development will very much depend on operational requirements and financial feasibility (particularly given the significant enabling development that is required in the form of MSCPs and artificial pitches).

Planning Policy Context

The planning policy context provided by the LPPU will be critical in facilitating the implementation of the Masterplan and, therefore, the realisation of the University's Strategy, ensuring its continued success and sustainable growth and supporting its valuable socio-economic role within the City and wider region (as set out above).

Policies B1 and B5 in the extant Core Strategy recognise that the spatial development strategy in the Local Plan should seek to enable the provision of additional teaching and research space and student bed spaces to facilitate the growth of the University. Indeed, Part 7 of Policy B1 remains appropriate as a statement of intent in relation to the support it provides for University related development.

However, the specific terms of Policy B5 are now substantially out of date. The first part of the policy refers to the provision of additional teaching and research space and student bed spaces on the campus, but the development figures presented in the policy were first identified 15-20 years ago, and only ever sought to provide for the development required in the period to 2020. Of great concern to the University is the very limited scope in relation to academic and research related development on (and, indeed, off) the campus.

The PMP acknowledges that the figures in Policy B5 are not, subject to a further masterplanning study of the campus, considered by the Council to be a "cap" to development. Indeed, as referenced above, the extant Policy SB19 in the PMP seeks to establish a high level framework for its future development. However, whilst the policy (and the framework embedded within it) highlights the acute environmental constraints, it does not reconcile the University's longer term development needs with the limited and finite capacity of the campus to accommodate further development, the priority the University has to give to those developments that must be co-located on the campus, or the significant operational implications that arise from the development of what capacity is available (for example, the existing car parks).

New Policy SB19

Overview

The University's Masterplan directly responds to the current policy context by providing a robust understanding of the key environmental issues, the benefits and also the implications of further significant development and infrastructure provision (notably the MSCPs and artificial pitches), and the resultant capacity within the campus taking account of these matters. The University, therefore, supports enshrining the key development principles and parameters established by the Masterplan in the new Policy SB19. This approach ensures that the policy is constructed on a sound basis with a clear understanding of the determinative opportunities and constraints.

The aim of the policy should be to seek to provide greater certainty in the consideration of future planning applications and enable their timely determination. A critical part of that is a clear policy commitment to enabling the University to realise the development it requires when needed.

The inclusion of the development capacity figures identified in the Masterplan is welcomed in that light, but the new policy must also explicitly refer to the importance of the University's activities and the direct socio-economic benefits that arise from its sustainable growth, highlighting that these

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matters must be given due weight in the determination of future planning applications. Those matters are currently ignored by the scope of Policy SB19. They are, however, critical in ensuring that those benefits, that are also key elements of sustainable development as recognised by the NPPF, are taken into account along with the environmental matters that the University have responsibly sought to address in the preparation of the Masterplan and, indeed, in its day to day management of the Campus.

Moreover, whilst the policy supports further development in defined locations in the campus, it is often heavily caveated and in certain instances gives too much weight to constraints of varying importance. When considering specific proposals in this location there will inevitably be a need for some compromise in order to optimise the capacity of the campus and realise environmental enhancements across the campus as a whole. That must be reflected in revised Policy SB19. As it stands the policy is unduly restrictive and does not reflect the presumption in favour of sustainable development embedded in the NPPF.

Policy Designation Overlap on Campus

The clarity and certainty that the existing Policy SB19 seeks to provide in relation to the consideration of planning matters on the Campus is effectively being undermined by the layering of a raft of other development management policies in the PMP that wash over the campus. The policies are not, therefore, constructively stitched together and there is a direct conflict with the intended purpose of Policy SB19. That remains the case as the LPPU fails to clarify that the provisions of Policy SB19 should take precedence. That will only result in a further significant restriction on development, even in those areas where development is accepted in principle in Policy SB19, and should be remedied in the LPPU.

Notably both the extant and new Policy SB19 (clause 3) highlight the development potential of the Eastern Playing Fields that were removed from the Green Belt in the review of the previous Local Plan, specifically to facilitate further development on the campus. Moreover, clause i in the Policy's "General Development Principles" states that any reduction in non-publicly accessible capacity is a matter for the University.

There is, however, a clear tension with the Policy LCR5 designation included in the District Wide Policies that seeks to protect and retain the pitches and only allows their "loss" in specific circumstances, and applies much more stringent tests. That tension needs to be resolved in order to provide greater certainty at the planning application stage, and facilitate rather than frustrate the delivery of the required development on the campus in a locality that entirely respects the provisions of Policy SB19.

As Policy SB19 provides a comprehensive policy context to guide development on the campus, the University campus should be specifically excluded from any other designations, and clarity provided in the policy and/or supporting text as necessary.

Policy SB19 Clause Objections

The University supports the scope and content of the majority of the clauses set out in Policy SB19 as they closely reflect the Campus Masterplan, and the principles and parameters embedded in its complementary strategies. However, the University does have a number of specific concerns and it is clear that some modifications are required to provide precision and clarity for future decision makers.

1. The support in principle for development does not need to be caveated and the list of "university related uses" should, for the avoidance of any doubt for the decision maker, include "*related services and infrastructure*".

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4. The last part of this clause is accepted by the University in so far as it relates to protecting the amenity of the residential properties to the south. However, the visual assessment of the Masterplan proposals has demonstrated that development in this location within the parameters defined within the policy will not be visible from that area. Nor are there any views from the Parade that warrant special treatment.

7. This clause appropriately reflects the GI Strategy embedded within the University's Masterplan and the Landscape and Ecology Management Plan (LEMP) that dovetails with it. However, the third paragraph in relation to biodiversity improvements applies to the whole of the campus rather than a specific area(s) and, therefore, for the sake of clarity, that would best be included in the general development principles (clause f – see further comments below).

8. This clause appropriately reflects the Sports Strategy embedded within the University's Masterplan. Notably, the provision of additional artificial pitches is an essential part of the University's strategy for enhancing its sports facilities (further detail is provided in the response to Policy LCR6). However, whilst the University is committed to examining the feasibility of a recyclable 3G pitch, it is inappropriate to establish that as a firm policy requirement at this stage as the Council's concerns in this respect have not yet been evidenced and, in any case, any limited harm that might arise would be substantially outweighed by the wider benefits of its provision in terms of capacity and accessibility.

9. This clause appropriately reflects the Access and Movement Strategy embedded within the University's Masterplan. However, the first paragraph applies to the whole of the campus rather than a specific area(s) / proposals and, indeed, duplicates the intent and provisions of clause g in the General Development Principles. It should, therefore, be deleted (see further comments below).

Sulis Club. Given the limited and finite development capacity at the Campus, the future role of the Sulis Club site and the opportunity it presents to address the longer term development needs if it was removed from the Green Belt should also be recognised in the LPPU, and considered more fully in the full review of the Local Plan in due course.

General Development Principles

a. The University agrees that ideally the full range of its development needs should be accommodated on the campus and that is clearly reflected in its Masterplan. However, given the limited and finite capacity of the campus, the University will not be able to accommodate all of its long term development needs on the campus, notably the required bed space accommodation. Consequently, the University must prioritise the provision of further academic and research developments on Campus that are critical to its continued success, and must for operational reasons be co-located with the existing services and facilities.

Nevertheless, the University is very aware of its responsibilities in respect of ensuring that its students are appropriately accommodated, and that is of course a fundamental element of the student experience that is critical to any University's continued success. Accordingly, further student bed space developments will take place on the campus as highlighted in the Masterplan, but it is the University's view that student residences will also need to be accommodated elsewhere in and around the city. Indeed, the LPPU already acknowledges (e.g. in other allocations and Policy H2) that further provision elsewhere in the city has, and will continue to, meet some of that need.

The specific requirement to accommodate all bed spaces for first years, and a significant share of spaces for subsequent years from 2011 (a date which is in any case not justified) should, therefore,

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be deleted from the clause.

b. This clause is supported by the University, as it is absolutely critical that the development capacity of the campus is optimised in order to meet future development needs. However, as stated above, it is the University's view that insufficient weight has been given to this matter (and the benefits of the development generally) in the policy and too much weight is given to constraints of varying importance (see below).

This clause also flags the flexibility and adaptability of buildings as a specific design consideration. They are indeed an important consideration in respect of many developments, but the Council must acknowledge that many of the University's developments, notably relating to their STEM subject teaching and research, are bespoke developments designed for a specific purpose. In those instances, flexibility and adoptability cannot be seen as a determining factor in terms of the design quality of the development. As this matter is any case addressed in other design policies, this part of the policy should be deleted.

c. This clause addresses the campus' sensitive heritage context, and quite rightly highlights that these matters need to be carefully considered. The clause, however, presupposes that any development on the campus would affect the significance of the identified heritage assets, which the Masterplan has demonstrated quite clearly not to be the case. It should, therefore, be redrafted to state, "*Where development is likely to affect the significance of, it will be assessed to determine the degree to which it does so and great weight will be given to the asset's conservation.*" The added reference to "*enhancement*" in the clause goes beyond that required by NPPF (para 199). Moreover, in accordance with the NPPF (paras 200-203) the clause should also highlight that where it is demonstrated that harm would occur, that should be weighed against the public benefit of the proposal.

f. The University understands the intent of this clause in relation to GI assets within the campus, but it does not recognise that there is already a comprehensive GI Strategy and detailed LEMP for the enhancement and management of the campus environment as a whole (see clause 7 above). They clearly demonstrate the University's commitment to being a sensitive and diligent custodian of its GI and landscape.

Indeed, as currently drafted, the clause is unduly restrictive and could be used to counteract the presumption for development in the locations within the campus identified elsewhere in the policy. It is clear that not all developments will be able to contribute to the campus GI wide strategy as the clause suggests, nor should it always be necessary for them to do so, particularly if they do not affect existing GI assets. Consequently, rather trying to link GI provision and enhancement to all individual development proposals, the wording of the clause should refer to the implementation of the Masterplan's GI Strategy and LEMP (perhaps with regular reviews). It should then require individual proposals to identify how GI assets within and around the specific development site have been addressed and any harm minimised / mitigated against, and where appropriate enhanced or localised green infrastructure linkages provided.

Moreover, as highlighted above, given the revisions to Policy SB19, there is now a significant overlap with the new clause 7. It is suggested that the third paragraph in clause 7, that does appropriately refer to the implementation of the University's LEMP to improve biodiversity across the campus, is included here. Consequently there is no need then to add the requirements referred to in the second paragraph of this clause. Indeed, those very specific requirements have not necessarily been evidenced as being required or, indeed, as appropriate for this location.

g. The aspiration of this clause is welcomed by the University. Significant work has already been

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done in terms of the improvements to public transport provision, walking and cycling infrastructure and the successful implementation of the University's Travel Plan which has been held up as an exemplar. The University's Masterplan sets out further proposals in this respect and the University intend to review its Travel Plan to realise further improvements.

However, it is again clear that not all developments on the campus will necessarily give rise to a need to consider these matters and therefore, the text should be revised to reflect that. Moreover, whilst the University is committing to actively seeking to minimise car trips, the requirement (currently) in the first paragraph of clause 9 is not appropriate and unduly onerous in this context given the complex inter-relationships highlighted above and external factors beyond the University's control. Consequently, the clause should recognise that its aspirations will be achieved by managing the travel demands through its academic offer and operations (e.g. increased remote learning and working), the provision of further PBSA on-campus and enabling and promoting of sustainable modes of travel.

h. The aspiration of this clause is also welcomed by the University, but there is a lack of clarity in the drafting of the text that should be remedied in combining this clause with clause **g**. It is unnecessary to loosely refer to other criteria and policies and inappropriate to seek to give policy status to guidance by cross referring to an SPD in the way it currently does. Those references should instead be made in the explanatory text.

i. The university welcomes the clarification and flexibility provided by this clause in relation to the rationalisation of University's playing pitches. That is critical if the shared aspiration for further PBSA provision on the campus is to be realised. However, as highlighted above, there remains a direct conflict with Policy LCR5 that seeks to protect the pitches and that needs to be resolved. Moreover, the University's sports facilities remain critical to the operation of the University, and compensatory provision will need to be made through the provision of a 3G pitch. The policy clause should be revised to explicitly refer to that.

Other Matters to be Addressed

q. This clause links (albeit not clearly) to clause a. As already stated the University agrees that the full range of development needs should be ideally accommodated on the campus, and they specifically accept that they need to provide residences for all students. However, the critical issue is that the capacity of the campus is limited and, therefore, off campus provision will be required if the identified needs are to be met. This clause should, therefore, be deleted, as it is unduly onerous requirements and, in any case, cannot be practically applied.

Tests of Soundness

Whilst the University broadly supports the new Policy SB19, the LPPU is not "sound" in NPPF terms, because as currently framed it:

- is **inconsistent with national policy** in that it will potentially restrict sustainable development on the campus for the reasons set out above; and
- is not **effective** in that in some instances the terms of policy are not precise and/or do not provide sufficient clarity for decision makers.

Required Change to Policy

However, those concerns can be relatively easily remedied through the minor modifications set out below.

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Add:

“The University of Bath: Claverton Campus & Sulis Club

The on-going operation and sustainable growth of the University of Bath in the city is supported. The following development principles and parameters will ensure that the development capacity of the Claverton Campus is optimised within the context of the environmental constraints to provide around 870 study bedrooms and 48,000 sq.m. of academic, research and support space, together with associated infrastructure to address the University’s potential long-term development needs.

As well as the specific matters set out below, the associated socio-economic benefits of the University’s activities and associated development will be taken into account in the determination of future planning applications for the development of the campus.”

1. Delete: “*subject to other policy considerations*” at the end of the first paragraph and add “*related services and infrastructure*” to the second paragraph.

4. Delete: “*and special regard should be given to the design of the development in this area and the quality of views from The Parade and from outside of the campus.*”

7. Move third paragraph to clause f.

8. Revise the second sentence in the second paragraph to state: “*The provision of a completely recyclable 3G pitch and natural crumb is encouraged.*”

9. Delete first paragraph.

Sulis Club. *Given the limited and finite development capacity at the Campus, the future role of the Sulis Club site and the opportunity it presents to address the longer term development needs if it was removed from the Green Belt should also be recognised in the LPPU, and considered more fully in the full review of the Local Plan in due course.*

General Development Principles

a. Delete text after academic space. Add “*and related support space, student residences and associated infrastructure.*”

b. Delete last sentence.

c. Revise to state: “*Where development is likely to affect the significance of, it will be assessed to determine the degree to which it does so and great weight will be given to the asset’s conservation. Any harm that would occur will be weighed against the public benefit of the proposal*”

f. Delete text and replace with: “*The implementation of the campus GI Strategy and Landscape and Ecological Management Plan (which will be updated periodically) is required to enhance the Green Infrastructure within the campus.*” Add third paragraph from clause 7. Add: “*New development proposals should identify how Green Infrastructure assets within and around the development site have been addressed, any harm minimised / mitigated against, and where appropriate enhanced, or localised green infrastructure linkages provided.*”

g. Delete text and replace with: “*Travel demand to and from the campus will be actively managed through the University’s academic offer and operations, the provision of PBSA on-campus and by*

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enabling and encouraging the use of sustainable modes of travel. A campus-wide approach is required including the implementation of an up to date Travel Plan, that should include suitable measures which reduce the demand for car parking on the campus. The operational level of car parking (about 2,200 spaces) should be maintained or reduced to avoid additional car trips and to protect the patronage and viability of sustainable travel modes. Proposals for decked parking as part of the reorganisation of the parking supply and optimising development capacity on the campus should include provision for blue badge, ULEV and bicycles (including ebikes).

h. Delete text.

i. Add to first sentence: “*and provision of a 3G pitch.*”

Other Matters to be Addressed

q. Delete text.