

Bath & North East Somerset Council  
Planning Policy  
Lewis House  
Manvers Street  
Bath  
BA1 1JG

7 October 2021

Submitted by email

Dear Sir/ Madam,

## REPRESENTATIONS TO THE BATH & NORTH EAST SOMERSET LOCAL PLAN PARTIAL UPDATE PUBLICATION (REGULATION 19) – BATH SPA UNIVERSITY

CBRE is instructed on behalf of Bath Spa University ('BSU') to submit representations to the Bath & North East Somerset ('B&NES') Local Plan Partial Review. The consultation documents consist of two parts – the changes to the Local Plan within the schedule of changes and the proposals maps which shows where the proposed changes would apply. This letter responds to the key BSU site allocations and relevant policies to the University.

### BACKGROUND

BSU is a key landowner and stakeholder in Bath and the region, making a positive contribution both economically and socially to the City. BSU welcomes the opportunity to work proactively with B&NES as part of the Local Plan review process to establish an appropriate framework to BSU's estate strategy and future growth aspirations. BSU has declared a 'climate emergency' and recognises that its land use planning is a key element in meeting its sustainability objectives.

BSU has established a collaborative approach with B&NES and has kept them up to date on their growth figures in terms of student numbers, but also in terms of their aspirations for their estate over the coming years. This has included making representations to relevant policy documents including the Placemaking Plan, with the aim to ensure the University's requirements are considered alongside other competing aspirations and land uses in the city.

### Background to the University

BSU is a leading University in the South West, recognised for its teaching and research excellence. It offers a range of pre-degree, undergraduate and postgraduate degree programmes, focused primarily on arts and humanities subjects. It has been 16 years since BSU gaining full university status, with its history in the city dating back over 160 years.

The University currently has a core of c. 8,200 students within Bath and its surrounding areas, across its five areas of study. Supporting this academic base are 840 full time equivalent employees (FTE) in teaching and supporting functions. The University also has strong links and partnerships with surrounding businesses, communities and schools. In addition to providing a highly skilled workforce, it is a source of entrepreneurialism and indirect benefits through its multiplier effects.

BSU's current academic estate is formed of its main campus at Newton Park and a second campus using the former Herman Miller Building on Locksbrook Road. The latter houses the School of Art, Film and Media and the School of Design. The University also has two small campuses, one at Sion Hill and one at Corsham Court (in Wiltshire), in addition to operating from a number of smaller sites for specific purposes.

The University's main campus at Newton Park provides 55% of the University's non-residential estate. This is the main campus for undergraduate courses and administrative hub. It is located within the Green Belt on land leased from the Duchy of Cornwall and is set around a Grade I Listed Country House set in Capability Brown designed landscaped gardens.

The University has undertaken significant investment in the site consistent with a comprehensive Masterplan for the campus. This has been delivered in two phases; Phase 1 (10/04747/FUL) provided c. 8,500 sqm of new academic space and Phase 2 (12/02141/EFUL) delivered 561 bed spaces to the south of the campus. This Masterplan was developed between, inter alia, BSU, B&NES, English Heritage and the Duchy of Cornwall.

Alongside this academic floorspace, the University provides 1,357 places for student accommodation which are University owned, with an additional 611 bedspaces from external providers.

To accommodate the changing requirements of BSU, changes in type and location of academic floorspace and the number and location of student bedspaces need to be accommodated. It should be noted that in relation to PBSA, BSU is seeking to increase bedspaces on-campus so as to improve its student experience. This aligns with the B&NES direction of travel set out in this consultation and should also reduce the pressure on market housing and HMOs.

The Partial Review of the Local Plan provides an opportunity to ensure that the proposed updates to relevant policies are correct and consistent with the future aspirations of BSU.

## REPRESENTATIONS

### Scope of representations

In light of the above context and growth requirements, BSU wishes to comment on the proposed scope and content of the proposed submission draft B&NES Local Plan Partial update document (2021). Our representations focus on the proposed new Policy SB24 which relates to a new allocation for Sion Hill, the new policy wording related to the Locksbrook Road Campus (Policy SB22), the approach to Purpose Built Student Accommodation (PBSA) (Policy HA2) and the BSU Newton Park Policy SB20. We understand that the scope of the partial update is confined to the following matters:

- Updated policies in order that they better address the climate and ecological emergencies
- Replenish housing supply in order for the Core Strategy housing requirement to be met and necessary supply of housing land maintained

- Address the limited range of other urgent local issues
- Amending policies for clarity and to ensure they are aligned with up-to-date national policy

### **Sion Hill –New Policy SB24**

The site allocation proposes the delivery of around 100 new dwellings within the existing footprint of the established buildings. This aspiration is something which is fully supported by the University and aligns with their broader estates strategy to focus development into two campuses; Newton Park and the area around Locksbrook Road. In particular, the University supports maximising the development potential, particularly the opportunity to deliver housing on a brownfield site, and which ultimately supports the Council in meeting its defined objectively assessed need of 12,956 new dwellings by 2029.

Importantly, the University recognises the importance of ensuring the protection and enhancement of the site's historic significance, landscape setting and ecological interests. The proposed wording of Policy SB24 provides a set of defined development requirements and helpful design principles that will guide future proposals. These principles are something which the University supports.

Given the sites location, BSU recognise the importance of ensuring that this planned growth is supported by enhanced sustainable transport routes, but would support future specific local consultation on the best means of achieving that as part of the planning application stage. Future development proposals and planning application are required to be informed by a Transport Assessment, which will take into account surveys of existing travel patterns associated with the Sion Hill Campus (including on-street parking) which have been undertaken annually by the University since 2008, and will include consideration of pedestrian and cycle access to the development, investigating the need for pedestrian crossing facilities over Lansdown Road, and traffic speed reduction measures on neighbouring roads as appropriate.

The site represents a highly deliverable location for new housing, within a sustainable location for redevelopment. The proposed development should be considered a realistic prospect for future housing within the next five years.

In line with paragraph 74 of the NPPF (2021), the draft policy identifies the deliverability of around 100 new homes at Sion Hill supporting the strategic housing requirement within B&NES Core Strategy (2014). All Local Planning Authorities in England need to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. The intensification of Sion Hill will help support the strategy objective of housing delivery within Bath.

### **Locksbrook Creative Industry Hub – New Policy SB22**

B&NES Economic Strategy (2014-2030) seeks to capitalise on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge-based sectors and retaining those skills and securing the best talent for the city. BSU is fully supportive of this approach and will continue to drive innovation within the Locksbrook Creative Industry Hub – through developing enhanced educational facilities that help support creativity and innovation.

The new policy recognises the expansion of the BSU Locksbrook Campus will play an important role in fostering the success of the creative hub. This will continue to have a positive impact on the economy, developing new business, and enhanced skills within Bath. Notwithstanding these benefits, it is critical that strategy remains grounded in the creation of educational facilities that support the strategic focus of the University. For completeness and were appropriate we have suggested updates to the policy wording through the following amendments. Note, additional or amended text is highlighted in bold, with wording to be removed crossed out.

#### Proposed amendments:

*Paragraph 167g. The allocation land includes the building (north of the Locksbrook campus) which has an extant planning permission for mixed use development including 72 rooms in cluster flats. (Planning Reference 20/00023/FUL). Purpose built student accommodation is subject to Policy B5 and it is not considered acceptable within the Enterprise Zone where this would adversely affect the realisation of the other aspects of the vision and spatial strategy for the city. Taking into account that the site has an extant permission it is considered acceptable, but the priority should be given to **higher education teaching space in line with 167e and 167f.**~~employment space therefore the scale of the student accommodation should not exceed the permitted level of accommodation.~~*

*Paragraph 167h. This is the area allocated for a Creative Industry Hub where Bath Spa University and businesses will work together to increase local growth and innovation. The Hub aims to:*

- *Encourage universities to strengthen their roles as strategic partners in local growth*
- *Stimulate development of incubator or 'grow-on' space for small business in locations that encourage businesses to interact with universities and to innovate*
- *Provide a focal point where universities and businesses work together in a business friendly environment*
- *Implement Bath Spa University walkable campus approach **and enhance local cycle routes** - reducing the carbon emissions and responding to the climate emergency*

#### POLICY SB 22: DEVELOPMENT REQUIREMENTS AND DESIGN PRINCIPLES

*Development proposals will*

*1. Provide a mixed use development comprised of **higher educational teaching space associated with Bath Spa University which can also be used as studio space with access to specialist equipment and facilities for start-up businesses and workspaces for local people, academics and students. This could include creative collaboration with the Fashion Museum, if that were to be located nearby.***

*~~2. Ensure that teaching space is designed and managed to be available as flexible workspace that is offered to small and medium enterprises on reasonable terms. The economic benefit to the city especially for industrial uses will need to be demonstrated.~~*

*3. Ensure that the size of the Purpose Built Student Accommodation is no more than the extant planning permission allows (up to 72 bedspaces cluster flat equivalent).*

*4. Contribute to delivery of the Sustainable Transport Route from west of Station Road to the disused former railway bridge over the river. **With traffic calming and new cycle routes proposed along***

**Locksbrook Road – proactively responding to the climate emergency through promoting sustainable transport links.** *This route would be required to:*

a. *be designed to a high quality in accordance with Cycle Infrastructure Design Guidance LTN 1/20, with cycle routes segregated from pedestrians.*

*(Note the remaining wording of the draft policy to remain as drafted)*

Separately, BSU is seeking to further enhance access to the Locksbrook campus through sustainable transport and supports the delivery of a new cycle route along Locksbrook Road. This would create enhanced links with Bath City Centre to the east and the Newton Park Campus to the west. There are aspirations for this route to take advantage of the proposed sustainable transport route from west of Station Road to Brasmill Lane, linking the site to the south over the river Avon. This could act as a significant public benefit supporting the University, the wider creative hub, the RiverLine project and neighbouring businesses and residents.

The Locksbrook creative industry hub is currently defined by the site boundary demarcated in Appendix 1 (Diagram 23). Whilst we support the defined area as the principal land parcel for the use of educational and creative industries, we recognise the developing synergies between local businesses, BSU and B&NES. This is likely to filter into the surrounding land parcels. We would encourage B&NES as the Local Planning Authority to provide flexibility for the surrounding sites in promoting the creative industry hub – this will support the wider economic benefits of the site.

The site map shown in Appendix 1 should be treated as permeable and allow for creative industries and educational uses to collaborate within the wider area – supporting growth, innovation and enhanced productivity within these sectors.

**Policy H2A - Purpose Built Student Accommodation and SB20 – Bath Spa University, Newton Park Campus**

B&NES purpose-built student accommodation (Policy H2A) seeks to address student accommodation needs arising from educational establishments. Policies B5 and H2A are intended to work together to set out that as a first priority PBSA should be developed on-campus and on allocated sites, and that it will only be allowed on other sites (excluding areas restricted by policy B5) where a need can be demonstrated. This on-campus focus, and approach aligns with the future aspirations of the University, to develop any additional required student accommodation within their Newton Park campus.

Within the context of Policy H2, BSU has developed a strategy to concentrate future student accommodation within their Newton Park campus. This will act as an attractive offering to first year students while ensuring that the student population does not contribute to drive the student lettings market to the detriment of normal market housing within the city. It remains key that on-campus PSBA keeps pace with the growth in residential student numbers to avoid any further pressures on the private letting market.

On campus PBSA at Newton park will help encourage BSU students to walk and cycle to on campus teaching facilities, this will be supported by enhanced links to the Locksbrook campus.

BSU is generally supportive of the proposed policy wording, as they continue to invest in the BSU academic estate in order to delivery high quality student accommodation at suitable campus locations. However, considers the wording of Policy SB20 should be updated to make explicit reference for the

preference for on-campus PBSA. This direct reference to preference to on-campus accommodation is missing and by including it would align Policy SB20 with the wording of Policies H2A and B5. SB20 should also make reference to the importance of sustainable energy sources such as Solar PV being encouraged in respect of existing and any new buildings.

## **SUMMARY**

We trust that these representations are helpful in the context of the Local Plan Partial Update Document and that comments and suggested policy amendments made within this letter will be considered as part of the proposed amendments to the plan.

BSU is seeking to ensure that the needs of the University with regards to academic floorspace and student accommodation are considered holistically in the context of other competing land uses. The University looks forward to continuing to work collaboratively with B&NES. Should you have any queries regarding the content of the letter and proposed amendments, please do not hesitate to contact me.

Yours faithfully,

**HANNAH BLUNSTONE**  
**DIRECTOR**

cc.

Mr P Fox – Bath Spa University  
Mr R Jordon – Bath Spa University