
STATEMENT ON BEHALF OF THE UNIVERSITY OF BATH (304)

MATTER 13 – BATH’S UNIVERSITIES

ISSUE – WHETHER THE APPROACH TO BATH’S UNIVERSITIES IS SOUND?

Q1. The Strategic Housing Market Assessment upon which the CS is based assumes that the expected modest growth in the student population will be accommodated through on-campus provision (CS Policy B5). With this in mind; is it appropriate to review Section 2F of the adopted CS in isolation to general housing policies and the overall strategy for Bath?

Q2. Is the proposed strategy justified and supported by evidence?

Q3. In the absence of off-campus provision for student accommodation, what impact are the recently revised growth aspirations of both the University of Bath and Bath Spa University likely to have on the objectively assessed needs for housing in Bath?

1. The University is a major driver of opportunity and economic growth in the City and District, and plays a significant role in defining the City’s cultural identity and general profile. Consequently, the Placemaking Plan (PMP) should play a critical role in supporting the University’s continued success and sustainable growth through the provision of a positive planning policy context. That should facilitate the expedient determination of future planning applications for key investments planned for the campus, **and** to realise potential off-campus academic, student residence and operational development opportunities to meet the needs that have been identified during the preparation of the PMP. On that basis it is clearly not appropriate or justified to consider the strategy for University related development entirely independently from the overall development strategy for the City as there are clear inter-relationships that need to be carefully considered.
2. The University have set out in their representations to Policy B5 and Policy B19 the predicted student numbers in the period to 2021, and the academic and student accommodation requirements that flow from that. This evidence has been discussed at length with the Council throughout the preparation of the PMP, and reflects the University’s emerging strategy for that period which directly responds to the Government’s current Higher Education (HE) policy (please refer to Appendix 1A attached to the University’s representation to Policy B5).
3. However, the revised Policy B5 no longer includes reference to specific development requirements (bed space and academic floorspace) needed to support the growth of the University. Instead there is just a weak commitment to enabling the “aspirations” of the University to be met. That is, however, heavily caveated with references to “environmental sustainability” (which is undefined) and the other development requirements in the City. Nor does the policy seek to facilitate or allocate sites for the off-campus development of student residences, or facilitate their delivery as part of mixed-used developments. That was proposed by the University in the PMP related

consultations so that they could prioritise the ultimately limited and finite development capacity of the campus for academic and research developments that must for operational reasons be co-located with the existing services and facilities (although that is not to say that there will be no further student residence developments on the campus). Moreover, the part of the extant Policy B5 that sought to restrict student accommodation development in the Central Area and Enterprise Area has now been extended to also include teaching space.

4. The PMP, therefore, effectively extends the control over off-campus University related development, seeks to isolate the University on its campus, and limits its ability to integrate itself into the City. The Council has done this because it has chosen not to review the Green Belt in the District, and then prioritised the provision of housing and employment floorspace within the existing city envelope over the University's development needs.
5. However, it is the University's position (as evidenced in their submitted representations) that the University's development needs cannot be met through on campus development alone, particularly given the ultimately limited capacity of the campus and the timescales required for delivery of that scale of development in a single locality. Indeed, whilst Policy SB19 purports to facilitate further development on the University's Claverton Campus, it does not seek to reconcile the University's development needs with the capacity of the campus to accommodate further development and is presented in prohibitive terms. It is too heavily caveated focusing on the constraints (of varying importance) that apply to the campus. There is no real commitment to enabling the University to realise its established development requirements, or any recognition of the importance and socio-economic benefits of the University's activities that would allow a balanced judgement of the social, economic and environmental objectives of the development proposals to be undertaken. Moreover, any proposed development would also be subject to a raft of other protective policies in the PMP, even where Policy SB19 purports to facilitate development (refer to response to Question 7 below).
6. Therefore, the inevitable consequence of the policy approach as set out in the PMP is that the University's development requirements are unlikely to be met. The PMP will, therefore, clearly prejudice the further growth of the University (as the Council have acknowledged- PMP paras 22 & 221), hindering the University's ability to respond to the Government's Higher Education policy and priorities (supporting internationally-leading research, contribution to economic growth, up skilling the workforce and widening access in HE), ensure its long term sustainability, and maintain its national and internationally recognised standing.
7. That is not justified and does not reflect the core planning principles in the National Planning Policy Framework (NPPF) that emphasises the need to **identify and meet** the development needs of an area, and respond positively to opportunities for growth. In relation to student residences specifically, the Government's Planning Practice Guidance states (Ref ID: 2a-021-020160401): "*Local planning authorities **should plan for sufficient student accommodation** whether it consists of communal halls of residence or self-contained dwellings, **and whether or not it is on campus.***"
8. Moreover, the Council has implicitly accepted the consequences of the PMP strategy for the economic and community roles that the University has in the city and wider region (a full account of which is given the submitted representation to Policies B5 and SB19 and their attachments) without actually considering what they might be; even in respect of the PMP's own stated strategic objectives (as set out in the submitted representations).

9. The University does much more to generate economic growth in the City than (as the PMP suggests) just provide a skilled workforce (although that is indeed a key catalyst in attracting and facilitating the growth of businesses in the area). The University provides a very substantial employment base in the city and makes a significant contribution to productivity that underpins economic growth, but critically its activities also facilitate and support company formation and business growth in the District. Its activities are driving economic growth, job creation and fundamentally the demand for the employment floorspace that the Council seeks to prioritise.
10. The PMP strategy, and notably Policies B5 and SB19, will hinder and frustrate the University's ability to do that. The failure to positively and effectively plan to meet the University's identified development requirements will, therefore, severely limit the potential of University to act as a positive catalyst for the improvements of the city's economy and the prosperity and well being of its inhabitants.

Q4. Will policies within the Placemaking Plan be effective in ensuring that any additional increase in need for student accommodation will not reduce the supply of general housing?

11. The failure of the PMP to positively plan for the provision of dedicated student accommodation both on and off campus will only result in increased pressure on the City's housing market. Whilst the Council has put measures in place to effectively control the increase in Houses in Multiple Occupation, the pressure for student residences is likely to result in schemes coming forward on sites proposed to be allocated for other uses in the PMP, including general housing. As set out in the University's representations, the PMP should specifically identify and allocate sites for the development of student residences and/or allow them to come forward as an element of mixed use schemes in the City.

Q5. Paragraph 17 of the CS confirms that the development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution. Is the strategy contained in the Placemaking Plan in relation to student accommodation the most appropriate when considered against any reasonable alternatives? What alternative options have been considered to meet the more recent indications / aspirations of the universities?

12. The University do not consider that the proposed PMP strategy is the most appropriate strategy for the University or the future development of the City and District for the reasons set out above. The negative impact on the University's operations and, therefore, its contribution to the economy and community, have not been assessed (notably in the Sustainability Appraisal) and taken into account in the determination of the most appropriate strategy for meeting student accommodation needs or indeed the University's wider development needs.
13. Nor has there been any consideration or robust assessment of alternative strategies where off campus sites are identified and allocated for student residence development, or additional land is released around the city (or elsewhere) to ease the development pressures and allow the full growth and development needs of the University to be met.
14. The University recognises the importance of meeting the full identified housing and employment development needs in the District. However, whilst the PMP strategy is presented as a means of protecting development sites in the City for these uses, that is

only necessary because there is a refusal to consider revising the Green Belt. That is, the Green Belt has clearly been prioritised over all other matters. The PMP claims that there are not any exceptional circumstances to justify the revision to the Green Belt (as required by the NPPF), but that is clearly not the case given the need to meet the identified housing (including student accommodation) and employment development requirements in the District, and the importance of ensuring the University's continued growth and success in accordance with the NPPF and HE policy, particularly given the wider socio-economic benefits that directly derive from the University's activities.

15. The PMP should, therefore, seek to release land from the Green Belt around the City or elsewhere in the District, to accommodate some of the housing and/or employment floorspace requirements. That would relieve the development pressures in the city to allow the off-campus student residence development to come forward, controlled either by a generic policy that allows schemes to be considered on their own merits, or through the allocation of specific sites.
16. Alternatively the PMP should seek to make specific provision that allows the full growth needs of the University to be met elsewhere in the City; for example through the development of the Sulis Club following its release from the Green Belt.

Q6. Are relevant policies positively prepared, effective and consistent with national policy?

17. Whilst further development will come forward on the Campus, given its finite development capacity the proposed strategy in the PMP, and specifically Policy B5 that seeks to isolate the University within its campus, presents an irreconcilable position that will ultimately constrain the University's growth to the detriment of the University, City and District. It is the University's view that the PMP should positively seek to provide for additional University related development off-campus, elsewhere in and around the City in an appropriate timescale as set out above. Policy B5 should, therefore, be revised to reflect the change in strategy and provide unequivocal support for the growth of the Universities subject to the identified externalities being addressed.
18. The University supports the intent of Policy SB19 to provide greater certainty at the planning application stage and facilitate (rather than frustrate) the delivery of the required development on the campus. However, as currently drafted the policy clearly fails to do that. Its support for development is heavily caveated with too much weight given to constraints (of varying importance) and without any recognition of the importance and socio economic benefits of the University's activities, or the need to optimise the capacity of the campus in order to meet as much of the identified development needs as possible. As such the policy unduly restricts the capacity of the campus to accommodate appropriate development, even in those areas where the policy purports to support development, and does not reflect the presumption in favour of sustainable development embedded in the NPPF.
19. The policies are, therefore, considered unsound on the basis that they:
 - have not been **positively prepared** and do not seek to meet assessed development and infrastructure requirements, notably in relation to the required growth of the University;
 - are not **effective** in that restricting the sustainable growth of the University will not allow the PMP's own strategic objectives to be realised; and

- are **inconsistent with national policy** in that they do not reflect the Government’s Higher Education priorities and policies, and seek to limit University related sustainable development outside of its own campus contrary to the requirements of the NPPF.

Q7. Is there tension between Policy SB.19 and LCR5 in relation to the safeguarding of playing fields and recreational space?

20. The University welcomed the identification of the hatched purple zones in Policy SB19 where development for University related uses is supported in principle. The zone includes the areas that were removed from the Green Belt in the review of the extant Local Plan to facilitate the further development and growth of the University, notably the sports pitches to the east of the Sports Training Village and the tennis courts to the west of Convocation Avenue. The University’s sports facilities remain critical to the operation of the University, and compensatory provision will need to be made, for example, through the provision of 3G pitches on St Johns Field in order to improve their capacity for use. However, the University also welcomed the clarification and flexibility provided by clause (i) in the Policy’s “General Development Principles” in relation to the University’s playing pitches, in short: any reduction in non-publically accessible capacity is a matter for the University. Sport England did not object to this policy approach.
21. There is, however, a clear conflict with the Policy LCR5 designation included in the District Wide Policies in the PMP that seeks to protect and retain the pitches and only allows their “loss” in specific circumstances, and applies much more stringent tests. That conflict 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.
22. Indeed, this is not the only example of where protective policies in the PMP (notably the designations in relation to Policies CP7, NE1, NE2A, NE3, and NE5) wash over the campus, and as a consequence there is a direct conflict with the intended purpose of Policy SB19.
23. The policies of the PMP are not, therefore, constructively stitched together and there is a complete lack of clarity in respect of which policy provisions take precedence. That can only result in a further significant restriction on development, even in those areas where development is accepted in principle in Policy SB19.

Q8. Is the strategy sustainable over the plan period?

24. It is very difficult to project potential growth beyond 2021 as it is very much subject to Government policy. However, as set out in their submitted representations and attached appendices (notably Appendix 1A to the representation in relation to Policy B5) it is not expected that the University would or could maintain the historic growth rates with its existing business model. The campus has a finite capacity in terms of the number of students it can accommodate at any time, and it is expected that future growth will increasingly come in the form of collaborative provision, where only a proportion of the delivery would be on campus, distance learning provision, and/or provision delivered wholly off campus in new University venues including locations outside the City and District (and even UK), and through innovative modes of delivery, such as online courses.

25. Nonetheless, the University does not consider the PMP strategy to be sustainable over the plan period. Whilst there is some residual development capacity on the campus, it is a scarce and quickly diminishing resource that is insufficient to meet the development needs identified to 2021, let alone any requirements beyond that. Consequently it is considered likely that a review of the Local Plan will be required in due course in order to release land from the Green Belt (e.g. Sulis Club) to facilitate the further development of the University.