

Bath and North East Somerset Council &
University of Bath

Statement of Common Ground

B&NES Local Plan Partial Update
Policies B5, SB19 and H2a

Local Plan Partial Update Examination
Matters 4 and 5

May 2022

1.0 Introduction

The Local Plan Partial Update was prepared by Bath & North East Somerset Council (the Council) and submitted to the Secretary of State in December 2021. The Council is producing *Statements of Common Ground* (SoCG) to establish areas of agreement between the selected participants to help focus discussion at the hearings.

This SoCG has been prepared jointly and approved by: a. Bath and North East Somerset Council and b. University of Bath (the University). This is based on the representations submitted by the University the consultation on the Submission Version of the Local Plan Partial Update Scheduled Changes. (Response ANON-23KX-G37E-X and ANON-23KX-G3FP-R)

2.0 Strategy Matters

It is agreed that:

- The University is a major driver of social mobility, opportunity and economic growth in the City and wider region.
- The Council recognises the importance of supporting the University's continued success and valuable socio-economic role by enabling its sustainable growth and development as far as it would not adversely affect the realisation of the other aspects of the vision and spatial strategy for the city.
- The University recognises the demand it places on residential accommodation in the city. Therefore, the Council and the University have been in close discussion in relation to the student growth plan and associated accommodation requirements and The Topic Paper Student Accommodation (CD-036) sets out the student numbers and expected accommodation requirements.
- Planning policy direction is required in respect of university related development both on and off the campus to reflect and respond to both the University's Strategy and the priorities of the Council.
- In developing its new University Strategy, the University has taken account of the rapidly changing economic, political, societal and technological context. The inherent uncertainties that the Higher Education sector faces presents challenges in precisely forecasting student numbers and assessing the need for new facilities in the long term.
- Continued investment in refurbishing the ageing buildings and the creation of new facilities and accommodation will be required to meet future needs and ensure that the campus environment provided is of the highest quality as befitting of a leading university.
- The planning policy context provided by the LPPU will be critical in facilitating the realisation of the University's Strategy and implementation of the Masterplan for the future development and enhancement of the campus.
- The revised Policy SB19, with more refined development requirements than those set out in the adopted Placemaking Plan, is in line with the general strategy set by the Core Strategy and it allows the University to meet their needs whilst the Council addresses the priorities and objectives for the city as a whole i.e. prioritise limited development land available for other uses such as housing and employment.

3.0 The Extant Planning Policy Context

It is agreed that:

- The extant Policies B1 and B5 in the adopted Core Strategy seek to enable the provision of additional teaching and research space and student bed spaces to facilitate the growth of the University.
- Policy B5 seeks to control university related development within the City's Central Area, Enterprise Zone and MoD land and direct it to the campus.
- The extant Policy SB19 in the adopted Placemaking Plan established a high-level framework for the future development of the campus to meet the full spectrum of the University's needs including academic space and PBSA reflecting the priorities of both the University and the Council.
- The extant Policy SB19 highlights the environmental matters that must be addressed, but does not specify the capacity of the campus to accommodate further development or the enabling works that are required to realise that capacity.

4.0 The Masterplan & Local Plan Partial Update Policy SB19

It is agreed that:

- The University has in collaboration with the Council prepared a new Masterplan that provides a vision of the future for the Claverton Campus.
- Its purpose is to enable the delivery of the development and infrastructure required to address the University Strategy and meet the needs and expectations of students, staff and partners in a manner that enhances the beauty and environmental quality of the campus.
- The Masterplan responds to the extant Policy SB19 by providing a clear understanding of the key environmental constraints, the required design response and the remaining capacity for development within the University's estate, including the land previously removed from the Green Belt.
- An iterative assessment and design process has been informed by a comprehensive and detailed evidence base and extensive consultation with key stakeholders and the public both by the University as well as through the LPPU informal and formal consultation. The potential development capacity of the Masterplan has, therefore, been robustly tested (albeit that will always be subject to the detailed design).
- The Masterplan, and the detailed assessments that have informed its preparation, form part of the evidence base for the review of Policy SB19.
- The revised Policy SB19 provides a robust policy framework for the long-term development of the campus with an appropriate balance of additional PBSA, academic, research and support facilities (that must for operational reasons be co-located on the campus with the existing facilities).
- It establishes clear and appropriate development parameters and design principles in relation to the location and scale of built development elements, the nature of the supporting

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infrastructure required and the protection and enhancement of the Green Infrastructure network.

- As such the policy provides clarity and certainty for all key stakeholders and will facilitate the timely determination of planning applications for key investments.

Matters in dispute:

- The University's representations have highlighted where some modifications to the policy wording would further assist future decision makers (see Appendix 1).

5.0 Policy B5 and H2A

It is agreed that:

- The planning policies should direct university related development to the campus as part of the sustainable spatial strategy in the plan period to 2029.
- The addition of Policy H2A is supported in principle and a minor modification is suggested by the University to clarify that "site allocations" includes the campus (Policy SB19) (see Appendix 1).
- Development on the campus is subject to operational and environmental constraints, but the PBSA identified in Policy SB19 can be delivered later within the plan period to meet the identified needs.
- The preparation of the Masterplan has highlighted that the development capacity on the campus is relatively limited, ultimately finite and subject to a number of demands and requirements that are essential to the University's operation (for example sport facilities and transport provision). In that light, a review of the spatial strategy (post 2029) in relation to off campus development should be undertaken when preparing the New Local Plan.

Matters in dispute:

- The Council understand the benefits of PBSA where it demonstrably helps to reduce pressure on HMOs. Therefore, new Policy H2A allows some off-campus PBSA of an appropriate scale and design where it can be demonstrated that there is a need for additional student accommodation.
- The University is of the view that flexibility in the policies is required to enable off-campus development in certain circumstances and reduce pressure on Houses on Multiple Occupation (HMOs) in the city.
- Furthermore, some modification to the policy wording would ensure consistency between policies H2A and SB19 and further assist future decision makers in determining when off campus development might be appropriate. (see Appendix 1).

6.0 Signatories

This SoCG is agreed on the 24th May 2022 by Bath and North East Somerset Council and the University of Bath.

Signed: Richard Daone, Deputy Head of Planning Services on behalf of Bath and North East Somerset Council

Signed: Professor Phil Allmendinger, MRTPI, MRICS, Deputy Vice-Chancellor on behalf of the University of Bath

APPENDIX 1

Policy SB19

Suggested changes by the University	Council's response
<p><i>"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.</i></p> <p><i>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."</i></p>	<p>Not considered necessary for soundness.</p>
<p>1. Delete: <i>"subject to other policy considerations"</i> at the end of the first paragraph and add <i>"related services and infrastructure"</i> to the second paragraph.</p>	<p>Not considered necessary for soundness.</p>
<p>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 are any views from the Parade that warrant special treatment. -</p> <p>Amendments suggested 4. Delete: <i>"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."</i></p>	<p>The evidence base was reviewed, and the Council agrees the amendment suggested.</p>
<p>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).</p> <p>Amendments suggested 7. Move third paragraph to clause f.</p>	<p>The Council agrees the amendment suggested.</p>

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<p>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).</p> <p>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.</p> <p>Amendments suggested 8. Revise the second sentence in the second paragraph to state: “<i>The provision of a completely recyclable 3G pitch and natural crumb is encouraged.</i>”</p>	<p>Not agreed. The University’s Sports Facilities Paper sets out its commitment to develop such a proposal and the Council welcome such commitment.</p>
<p>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).</p> <p>Amendments suggested 9. Delete first paragraph.</p>	<p>Agree that it applies to the whole of the campus but it is important to state that further growth is to be accommodated without increasing car trips, therefore it is appropriate to retain the paragraph under clause 9.</p>
<p>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.</p>	<p>All policies will be reviewed through the new Local Plan, therefore it is not necessary to refer to the longer term development nor new Local Plan.</p>
<p>General Development Principles</p>	
<p>a. Delete text after academic space. Add “<i>and related support space, student residences and associated infrastructure.</i>”</p>	<p>Not considered necessary for soundness.</p>
<p>b. Delete last sentence.</p>	<p>Not considered necessary for soundness.</p>
<p>c. Revise to state: “<i>Where development is likely to affect the significance of, it will be assessed to determine the degree to which it does so and great</i></p>	<p>Not considered necessary for soundness.</p>

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<p>weight will be given to the asset’s conservation. Any harm that would occur will be weighed against the public benefit of the proposal”</p>	
<p>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.”</p> <p>Add third paragraph from clause 7. Add: “New development proposals should identify how Green Infrastructure, landscape and ecological 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.”</p>	<p>Agree with the amendments suggested except adding ‘landscape and ecological’ after Green Infrastructure.</p>
<p>g. Delete text and replace with: <i>“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 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)”.</i></p>	<p>Not considered necessary for soundness.</p>
<p>h. Delete text.</p>	<p>Disagree.</p>
<p>i. Add to first sentence: “and provision of a 3G pitch.”</p>	<p>Not considered necessary for soundness.</p>
<p>Other Matters to be Addressed</p> <p>q. Delete text.</p>	<p>Not considered necessary for soundness.</p>

Policy H2A

<p>Suggested changes by the University</p>	
<p>Purpose built student accommodation of an appropriate scale and design will be permitted: <i>“a) On allocated sites including campuses where student accommodation use is specifically identified within the Development Principles; or”</i></p>	<p>Policy SB19 specifically identifies student accommodation therefore it is not considered necessary to amend as suggested.</p>