



CBRE, Inc.
Henrietta House
Henrietta Place
London W1G 0NB
+44 (0)20 7182 2656
++44 7879 110 504

robert.nicholas@cbre.com

31 May 2022

Submitted via email to B&NES Council and Ian Kemp (Programme Officer)

Dear Mr Philip Lewis ,

Examination Hearing Statement – Bath & North East Somerset Local Plan Partial Update – Bath Spa University

Matter 4 – Policy SB22: Locksbrook Creative Industry Hub Development & Policy SB24: Sion Hill

CBRE is instructed by Bath Spa University (hereafter referred to as ‘BSU’) in respect of their interests within the Bath and North Somerset (‘B&NES’) Local Plan Partial Update (hereafter referred to as ‘the Plan’). With specific reference to the proposed allocations/policies within the Plan their particular interest includes specific focus on the following policies:

- Policy SB22: Locksbrook Creative Industry Hub;
- Policy SB24: Sion Hill; and,
- Policy H2A: Purpose Built Student Accommodation.

This statement is one of two submitted in relation to the examination proceedings and responds to Matter 4, Issue: Are the proposed policies and allocations justified, effective and consistent with national policy.

Policy SB22: Locksbrook Creative Industry Hub Development Requirements and Design Principles

Question 22: The policy requires that teaching space is designed and managed to be available as flexible workspace that is offered to small and medium enterprises on reasonable terms. What is meant by this, is this requirement clear and would it be effective?

Policy SB22 reflects BSU’s future growth strategy through enhancing and expanding the Locksbrook Road campus, building on their significant investment in recent years, and as a result of consolidating activities at their Newton Park campus. This includes encouraging sustainable travel links between the two campuses. In reviewing the BSU growth and estate management plan, the university recognised opportunities for creating an expanded campus at Locksbrook Road that will promote a walkable campus close to student



accommodation. The University welcomes the opportunity to work closely with B&NES in enabling positive economic regeneration and supporting the continued success of the Locksbrook Road area as a creative hub.

BSU has the ability to help foster innovation within the creative industry hub. The policy creates a long-term mechanism for promoting further teaching space, and ensuring that it is adaptable for creative businesses as flexible workspace.

It remains critical that the spaces within the creative hub are focused on educational uses that can be used for alternative studio space suitable for start-up businesses. This is reflective of the types of businesses that are likely to grow out of the creative industry hub.

Through expanding the Locksbrook Campus as a hub for creative courses there is a clear correlation between the growth strategy of the University and a wider opportunity to promote creative industry innovation and empowering start-up businesses to thrive.

As has been set out in the covering letter of this statement, there was an oversight in agreeing the Statement of Common Ground ('SoCG'), and the University still proposes different wording to Policy SB22 than has been set out in that statement. This is reflective of their initial representations which set out the reasoning for any expansion to be focused on further higher education space which can be enabled to be used for start-up businesses. The University does, however, agree with the suggested alternative wording for the second part of Clause 1 which addresses the ambiguity of the reference to 'reasonable terms'. As such, BSU's proposed wording is:

Development proposals will

1. Provide a mixed use development comprised of employment space including incubator units and 'grow-on' space and teaching space. ~~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.~~

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.~~

The revised wording aims to ensure that policy reflects the uses that need creative studio space and specifically references start-ups and workspace for local people, academics and students. This provides sufficient flexibility for potential users of the space and will help foster creative practices on the campus.

We have informed officers of our position on this policy, however, welcome their agreement with amending Clause 2, which was seen as overly prescriptive in defining the scale of the businesses, potentially limiting the effectiveness of the policy in promoting innovation.

The proposed amendments are considered to actively deliver the aims of the creative hub through the provision of studio work space for start-up businesses which will benefit from the interaction with creative partners at Locksbrook and the Universities wider network. The proposed revisions to the policy are considered necessary to ensure it is effective in setting a mechanism for the creative hub to develop.

Policy SB24: Sion Hill Development Requirements and Design Principles

Question 33. What is the justification for the development of the site with around 100 apartments, would this be effective and is the proposed allocation viable and deliverable with the policy requirements?

The site allocation positively responds to a recognised need for additional housing supply within Bath. The Plan has been prepared to address important issues in the short-term, this includes replenishing or updating housing supply, and is critical to addressing a future shortfall. The Housing Topic Paper 2021 (Ref CD-SD026) identifies a supply shortfall of around 1,100 dwellings across B&NES up to 2029. This is based on the Core Strategy delivery requirement of 722 dwellings per annum.

However, the spatial strategy remains unchanged and promotes the use of brownfield sites within Bath, at Keynsham and then Somer Valley. Therefore, the proposed intensification of Sion Hill will support the strategic objectives of housing delivery within Bath and forms a key part of the wider approach to addressing the supply shortfall across B&NES on a sustainable brownfield site.

The proposed site allocation at Sion Hill will be available for redevelopment in the short term as part of the BSU Estate Strategy which has focused upon redefining the current campus structure through promoting sustainable travel links between the Locksbrook Road and Newton Park campuses (as outlined within paragraph 167e of the schedule of proposed changes).

The Sion Hill site allocation represents a deliverable and realistic prospect for enhancing housing supply within a highly sustainable location. BSU are in the process of vacating the site during 2022, with the remaining teaching being transferred to Locksbrook Road and Newton Park, and therefore all accommodation will become surplus to requirement.

The delivery of approximately 100 new dwellings is based on the redevelopment of the established footprint for the existing buildings. This will either see the repurposing and refurbishment of the campus buildings or redevelopment on the same footprint of the site. All of the dwellings are planned to be delivered within the next five years. Initial feasibility work and design optioneering is already underway to facilitate early delivery of the site. It is important to note that no major infrastructure intervention is required to enable the development to take place, ensuring that the site is viable to be brought forward relatively quickly.

Overall, the allocation positively responds to the identified housing shortfall and will provide a proportion of affordable housing within a highly sustainable location, with access to shops and services and employment opportunities. The deliverability of the site allocation within the first five years will ensure the effectiveness of the policy and consistency with the NPPF (2021) in responding to housing need through the re-use of brownfield land.

Question 34: What is the specific justification for the transportation requirements set out in the criterion 10, and would they be effective?

The requirements outlined within clause 10 seek to promote sustainable travel through ensuring safe and attractive walking routes to key destinations. BSU are committed to ensuring that the delivery of 100 new homes is supported by the enhancement of these sustainable travel routes.

Future local consultation will take place on the best approach to achieving sustainable travel, this will be undertaken as part of the planning application process. The emerging proposals will be supported by a Transport Assessment at the application stage. This will consider surveys of existing travel patterns associated with the Sion Hill Campus, which the University has historically undertaken annually, and a review of cycle and pedestrian access. At the planning application stage detailed analysis will be undertaken regarding the pedestrian crossing facilities over Lansdown Road, and any requirement for speed reduction measures on surrounding roads. Any proposals should be developed within the context of the Council's Liveable Neighbourhood Principles. In that context it is premature to single out particular roads in isolation at this stage, and to we consider that Clause 9 should be amended to delete specific reference to Winifred's Lane, to read '*...but options to reduce traffic flows and speeds along Winifred's Lane, to make the routes safe and suitable for pedestrians and cyclists should also be investigated*'.

Furthermore, to ensure the policy is effective we also consider that Criteria 10 should be amended to note that, '*Measures for investigation and delivery should include consideration of...*'. It will be for the Planning Application in consultation with the Council and local residents to consider the most appropriate interventions to deliver the objective of creating safe pedestrian and cycle routes. We understand from B&NES Council that reference to measures on Winifred's Lane was not meant a confirmed proposal but option for investigation. As such a minor modification is sought to ensure this Policy is effective.

Summary

BSU is supportive of the principles outlined within both site allocations and has put forward minor modifications to enhance the effectiveness of the policy wording. We trust that this statement assists in

progressing matters and that the comments and suggested policy amendments made within this letter and the agreed SoCG will be considered as part of the proposed minor modifications 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 working collaboratively with B&NES on the two site allocations in the future.

We would be grateful if the Programme Officer could confirm receipt of this response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H Blunstone', written over a light grey rectangular background.

Hannah Blunstone

Director

For and on behalf of CBRE Ltd

cc. Mr Paul Fox – PVC Finance & Infrastructure - BSU

Mr Richard Jordon – Director of Estates and Services - BSU