

STATEMENT ON BEHALF OF THE UNIVERSITY OF BATH (304)

MATTER 5 – BUILDING STRONG AND VIBRANT COMMUNITIES

ISSUE – WHETHER THE RELEVANT PROPOSED POLICIES IN THE PLACEMAKING PLAN ARE POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY IN THE CONTEXT OF THE ADOPTED CS?

Q4. Is the approach to the designation of the Local Green Spaces (Policy LCR6A) sound and is there justification for those that are designated.

In particular:

(b) Is the exclusion of the following sites justified?

Undeveloped land on the northern part of the University of Bath Campus?

1. The only part of the campus that was considered as a potential Local Green Space was St John's Field, which comprises the sports fields located to the north of Claverton Down Road (Site Number IGBND1 in the Local Green Space Designations Report).
2. When consulted by the Council following the site's nomination, the University strongly objected to the potential designation on the basis of the guidance in the National Planning Policy Framework (NPPF). That states (para 77) "*the Local Green Space designation will not be appropriate for most green areas or open space*" and continues to set out a number of criteria for the designation of these spaces:

"The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
 - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - *where the green area concerned is local in character and is not an extensive tract of land."*
3. St John's Field clearly does not match the given criteria, and no evidence has been given as to how St John's Field serves the community, or is demonstrably special to it.
 4. Paragraph 17 of the Planning Practice Guidance (PPG) highlights that "*Local Green Space may already have largely unrestricted public access*". This is not the case with St

John's Field, which accommodates a large area of playing fields that are for the exclusive use of the University, and public access is normally only obtainable through prior arrangement with the University.

5. St Johns Field was previously (2007) the subject of an application to record it as a Village Green. Following a non-statutory public inquiry that application was refused on the basis that the primacy of the University's use of the area had never been challenged and, whilst the University have tolerated the sporadic use of the area by local residents for informal recreation activities, they have continuously sought to regulate that to ensure that it is not inconsistent with their operational use of the land.
6. In terms of the NPPF criteria for the designation of a Local Green Space, St John's Field is not, therefore, of particular local significance in terms of its public recreational value. Furthermore it has no particular known ecological or historical value.
7. St John's Field is, however, already part of a large area of land protected by the long established Green Belt designation, and it also forms part of the wider Cotswolds Area of Outstanding Natural Beauty (AONB). Paragraphs 10 and 11 of the PPG ask what additional potential benefit would be gained from designating areas already designated as Green Belt and AONB? Given the role of the site within the campus as set out above, it is apparent in this case that no additional benefit would arise from its designation as a Local Green Space.
8. Moreover, the Placemaking Plan explicitly recognises the need for further development on the campus to enable the sustainable growth of the University. Whilst the University has objected to some of the specific elements of Policy SB19 that seek to establish a framework for future development on the campus, it supports the general intent of the policy.
9. The University campus is already a highly constrained site and the University must optimise its finite development capacity to ensure its continued success. In order to facilitate academic and student residence development elsewhere in the campus (notably on the land removed from the Green Belt in the last review of the Local Plan that is also used for sports pitches), St John's Field will need to be more intensively used for sports purposes. That may require some development in itself (e.g. provision of 3G pitches), but that would accord with the NPPF as "*appropriate development*" in the Green Belt (paragraph 89). It would, therefore, be entirely inappropriate for an additional designation to be applied to this area that could frustrate this further sustainable development of the campus.
10. On the basis of the above matters, the exclusion of St Johns Field from a Local Green Space designation in the Placemaking Plan is entirely justified.