

Inspector’s Matters, Issues and Questions Matter 4

Policy SB19 University of Bath Claverton Campus

1. Introduction

1.1 At day 2 of the examination hearings the Inspector requested dialogue between the Council and the University of Bath to go through the University proposed policy amendments in Appendix 1 of the SoCG (CD-SD067) and provide the final position on the areas of agreement and disagreement. The areas in agreement will be incorporated in the Council’s draft main modifications.

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.</i></p> <p><i>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>Disagree. Policy SB19 sets out the development framework and requirements for the Claverton Down Campus. The reference to the operation and growth of the University in the city is managed by Policy B1.</p> <p>Agree with the amendment suggested providing that ‘in seeking’ is added after the environmental constraints’.</p> <p>Modification proposed.</p> <p>Disagree. The socio-economic benefits of the University are well understood but already explained in the explanatory text and it does not need to be included in the Policy. The suggested wording would not be effective as it would not provide the necessary clarity for the decision maker.</p>
<p>Delete: <i>“subject to other policy considerations”</i> at the end of the first paragraph</p> <p>add <i>“related services and infrastructure”</i> to the second paragraph.</p>	<p>Disagree. It is still helpful and effective to refer to other policy considerations.</p> <p>Disagree. The Council proposed wording refers to ‘university related uses’ which would include related services and infrastructure’.</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>Agree - Modification proposed. 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>Agree - Modification proposed.</p>
<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</i></p>	<p>Disagree with the pre-hearings suggestion. However, the following amendment was agreed at the hearings and will be added to the main modifications</p>

<p><i>recyclable 3G pitch and natural crumb is encouraged.”</i></p> <p>Post hearings: The University is agreed.</p>	<p><i>Agreed to insert ‘unless it is demonstrated to not be feasible’ after ‘a precautionary approach must be taken and a completely recyclable 3G pitch and natural crumb will be required.’</i></p> <p>8. Main Modification proposed to refer to NPPF 99 b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location consistent with national policy as below. <i>“8. Sports facilities The loss of playing fields resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location consistent with national policy (NPPF para 99b). The provision of the 3G pitch would meet that requirement by significantly increasing the capacity and quality of the pitch provision across the campus. Responding to environment and health related concerns a precautionary approach must be taken and a completely recyclable pitch and natural crumb will be required unless it is demonstrated not to be feasible.”</i></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>Post hearings: The proposed change to clauses g & h below dealt with the first part of this clause effectively. It is also unreasonable in requiring no increase in trips. Therefore, the first paragraph in the clause should be deleted.</p>	<p>Disagree. 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.</p>	<p>Disagree.</p>

<p>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>Disagree. The current wording is considered appropriate.</p>
<p>b. Delete last sentence.</p>	<p>Disagree. The current wording is considered appropriate.</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 weight will be given to the asset’s conservation. Any harm that would occur will be weighed against the public benefit of the proposal”</i></p> <p>Post hearings: Not all development will give rise to a need to consider these matters (e.g. something quite minor won’t), and it requires further clarity in the wording.</p>	<p>Disagree. The current wording is considered clear and effective.</p>
<p>f. Delete text and replace with: <i>“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.”</i></p> <p>Add third paragraph from clause 7. Add: <i>“New development proposals should identify how Green Infrastructure 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.”</i></p>	<p>Agree to delete the first paragraph under f) and replace with the text suggested.- Modification proposed.</p> <p>Agree with the amendments suggested except adding ‘landscape and ecological’ after Green Infrastructure. Modification proposed.</p> <p>Modification proposed to add a para moved from clause 7: <i>“Biodiversity will also be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds.”</i></p>

<p>Post hearing</p> <p>The University is content with the new paragraph but it effectively repeats the second paragraph in the Regulation 19 draft policy. It is, therefore, suggested that paragraph (below) is.</p> <p><i>'Provide a minimum of swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs/walls are also required'.</i></p>	<p>Disagree with proposed deletion. The current wording is considered clear and effective.</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>Agree as discussed at the hearings- Modification proposed.</p>
<p>h. Delete text.</p>	<p>Agree as discussed at the hearings. Modification proposed so that Clause h) is combined with clause g) above.</p>
<p>i. (new h) Add to first sentence: <i>"and provision of a 3G pitch."</i></p>	<p>Agree with the amendment below.- Modification proposed. <i>h. Apart from the Area 2 (current Eastern field playing field) which is identified for redevelopment following the rationalisation of the playing pitches and the provision of a 3G pitch'.</i></p>
<p>Other Matters to be Addressed</p> <p>q. Delete text.</p>	<p>Disagree as this is an important element of the strategy in managing student accommodation (including HMOs) across the city.</p>

Policy H2A

Suggested changes by the University	
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>	Disagree. Policy SB19 specifically identifies student accommodation therefore it is not considered necessary to amend as suggested.