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UNIVERSITY OF BATH CAMPUS MASTERPLAN: PLANNING POLICY CONTEXT



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1 INTRODUCTION

- 1.1. The context for the preparation of the University's Masterplan stems from the need to provide additional academic and related floorspace and student bedrooms to accommodate the anticipated significant growth of the University in the period to 2020. There is also a requirement to address the poor condition of some of the original buildings on the campus that are nearing the end of their design life.
- 1.2. The requirement for the University to maximise the development potential of its land holdings in order to meet the needs arising from its continued growth is acknowledged in the Bath & North East Somerset Council (BANES) Local Plan that was adopted in October 2007. Policy GDS.1/B11 identifies the campus as a "General Development Site" and requires the preparation of a comprehensive Masterplan to guide the anticipated development in the plan period to 2011. To allow this a significant part of the campus was removed from the Green Belt that surrounds Bath.
- 1.3. It is intended that once finalised the University Masterplan will be endorsed by both the University Council and B&NES. It will then provide a framework for future development, and as specific proposals come forward the University will apply to B&NES for planning permission with some certainty that permission will be granted in a timely manner.
- 1.4. In order to achieve that, this report assesses how the proposed University Masterplan accords with the provisions of the relevant planning policies against which the planning applications will eventually be determined. It seeks to demonstrate that both the University and B&NES can endorse the Masterplan with the confidence that its proposals are acceptable in planning terms and can be appropriately implemented.

2 PLANNING POLICY CONTEXT

- 2.1. The Town & Country Planning Act 1990 requires that planning applications are determined having regard to the Development Plan so far as material to the application, and to any other material considerations. In this context the Development Plan constitutes the saved policies of the Local Plan adopted in 2007, and the Joint Replacement Structure Plan (JRSP) was adopted in 2002.
- 2.2. The Regional Spatial Strategy will replace the Structure Plan (which is now largely out of date) and form part of the Development Plan when it is adopted (expected Summer 2009). The RSS, however, provides very strategic guidance to the nature, scale and location of development and infrastructure required on a regional and sub-regional basis, and for the main part will not be of direct relevance to the detailed consideration of the University Masterplan and specific projects within it. There are, however, policies that seek to protect nationally and regionally important designated areas (e.g.

AONB), and set standards for development in terms of, for example, sustainable construction and renewable energy, that will need to be considered in the context of specific planning applications.

- 2.3. "Other material considerations" include the policies contained in national planning policy guidance/statements. Of particular relevance to the University are PPG2: Green Belts, PPS7: Sustainable Development in Rural Areas, PPG13: Transport, PPG15: Planning and the Historic Environment, and PPG17: Planning for Open Space, Sport and Recreation.
- 2.4. Consequently, the preparation of the University Masterplan, and determination of subsequent planning applications, will be considered principally in the context of the policies of the Local Plan, but also the RSS and the provisions of national planning policy statement, for the foreseeable future.

Future Planning Policy Context

- 2.5. The Local Plan is due to expire in 2011, and will be replaced by the Local Development Framework (LDF) which B&NES have now begun to prepare. Notably the Core Strategy will set out the longer term planning framework for the plan area, including a spatial vision and objectives for a 10 year period post adoption, but also looking ahead to 2026 to tie in with the RSS. A Proposals Map Development Plan Document will also be prepared to give a geographical expression to the Core Strategy policies. An initial "Issues and Options" consultation has been undertaken, and a Strategic Options consultation will be undertaken in June.
- 2.6. The University expects that LDF, and the Core Strategy in particular, will continue to support their continued growth by establishing an appropriate policy context that reflects the proposals and provisions of the endorsed Masterplan beyond the current Local Plan period, and therefore allowing for seamless continuity in its implementation.

3 KEY POLICY TESTS

- 3.1. As stated above the key policy tests for development at the University is set out in Policy GDS.1/B11, which requires the preparation of a comprehensive masterplan that provides:
 - 43,250m² of university related development and 40,000m² of student residential accommodation;
 - Protection for the green heart to the campus, St John's Field (Green Belt) and other visually and ecologically important landscape areas;
 - Adequate suitable replacement on or off site of any displaced sports facilities;

- On and off site transport infrastructure necessary to deliver an integrated transport solution;
 - High quality design and landscaping that responds to the AONB and improves the visual and landscape relationship with neighbouring areas, notably Bushey Norwood.
- 3.2. Therefore, the subsequent sections of this report consider the following matters, addressing the above policy tests, and also referring where appropriate to other key policies within the Local Plan and national planning policy statements:
- i. Quantum of development proposed
 - ii. Protection of environmentally sensitive (open and landscape) areas
 - iii. Sports provision
 - iv. Integrated transport solution
 - v. Design and landscape issues

4 QUANTUM OF DEVELOPMENT

- 4.1. The historic growth the University has experienced and the various scenarios for the anticipated further growth are set out in the Masterplan itself and do not need to be repeated here. However, the justification for the quantum of development proposed is clear. The historic growth in student numbers has resulted in a 50% reduction in the area available per student since 1990. Moreover, whilst it is not expected that the University will continue to grow at historic rates in the period to 2020, further growth is necessary if the University is to contribute towards the national priorities for higher education provision, retain its current status as a top 15 University, and continue to perform its critical social and economic development role within the city and wider area. Therefore, further significant development is required to accommodate this growth, but also to ensure that the teaching and research environment provided is of the highest quality, and befitting of a leading University.
- 4.2. The quantum of development required to accommodate the anticipated growth of the University was considered in great detail at the Public Inquiry into the Local Plan that resulted in the removal of parts of the campus from the Green Belt to allow further development. The Local Plan, however, could only plan for development within its plan period (to 2011).
- 4.3. The University must take a longer view to ensure effective site and financial planning in response to the anticipated development requirements. The Masterplan, therefore, looks to 2020, and includes provision for 60,000m² of academic and administrative space and 2,400 new study bedrooms. The

quantum of development proposed has been discussed with key stakeholders, including B&NES, who were keen to maximise the provision of study bedrooms in order to ease pressure on the housing stock elsewhere within the city.

5 PROTECTION OF ENVIRONMENTALLY SENSITIVE AREAS

5.1. The Masterplan Report highlights that the challenge has been one of accommodating the scale of growth required, whilst not adversely affecting the inherent qualities of the existing campus or inappropriately impacting upon the surrounding area. The Masterplan that has emerged has sought to focus development into areas of lesser environmental quality so that new development can bring about improvement.

5.2. As referred to above, the Public Inquiry into the Local Plan resulted in the removal of parts of the campus from the Green Belt to allow further development. Evidence presented to the Inquiry by the University included an analysis of the development capacity of the campus, highlighting appropriate locations for future development. The Inspector largely agreed with its conclusions, but also identified additional areas where he thought there was capacity for further built development. These included the area to the north and south of the bus stop and the area to the east of the Western Car Park close to the Medical Centre. The Masterplan that has since emerged has responded to these conclusions.

5.3. The Inspector also identified areas that he thought should be protected, and they are specifically referred to in the Local Plan policy. Reflecting that, a key element of the Masterplan is the designation of the parkland as the University Park. The provision of new routes through it, and the location of key new development around its perimeter, will ensure that it becomes the heart of the University. It is also intended that the landscape will be refined so that the whole Park can be seen as a single entity while retaining the distinctive character of its constituent elements. Further details are provided in the Masterplan report (Section 5).

Green Belt

5.4. The campus is surrounded by the long established Bath Green Belt. Indeed, it includes within it some outlying parts of the campus used as sports pitches, including St John's Field, Lime Kiln Field and the Sulis Club. This obviously places a significant constraint on development in these areas. The Masterplan does not propose any significant change for those areas remaining in the Green Belt, and they will continue to be used for sport and recreation purposes.

5.5. However, to allow the development of the area to the west of Convocation Avenue, which was removed from the Green Belt, it is proposed that the existing tennis courts are relocated to Lime Kiln Field, which still lies within

the designated Green Belt. PPG2 (para 3.4) includes essential facilities for outdoor sport and recreation as appropriate development where it preserves this openness of the Green Belt and does not conflict with the purposes of including land within it. This proposal also accords with the objectives for land within the Green Belt set out in PPG2 (para 1.6), which include “providing opportunities for outdoor sport and outdoor recreation near to urban areas”. Policy GB.1 of the BANES LP reflects this provision. It is considered, therefore, that the relocation of the tennis courts to Lime Kiln Field accords with Green Belt Policy.

6 SPORTS PROVISION

- 6.1. The playing field areas at both the main campus and the Sulis Club site are also subject to a recreation policy designation. In this respect PPG17 and Policy SR.1A of the Local Plan apply. Policy SR.1A seeks to prevent the loss of playing fields, formal recreation land or land used for such purposes unless it can be demonstrated that:
- there is no longer a demand or prospective demand, a deficiency would not be created; or
 - that the land is incapable of being used for recreation; or
 - that suitable and accessible replacement facilities of equivalent quality, quantity and community benefit would be provided; or
 - the proposals is for an indoor or outdoor sports facility with at least equal community benefit.
- 6.2. Policy GDS.1/B11 which relates to the campus specifically requires that “adequate suitable replacement on or off site of any displaced sports facilities” is provided. This reflects the fact that there is no realistic opportunity to extend the campus, and therefore, the limited space within it needs to be used more intensively to accommodate both the required built development and the sports provision.
- 6.3. In terms of external sports provision on the main campus, the aim of this Masterplan is to maintain as many of the existing playing fields as possible. Any loss in recreational area will be offset with a corresponding increase in functionality and quality associated with the remaining recreational space. This includes the provision of, for example, new all-weather pitches to provide for extended access during winter months.
- 6.4. In this respect, PPG17 (para 13) clarifies the need to ensure an adequate supply of open space and sports and recreation facilities, proposing that the new land and facilities should be at least equivalent in terms of size, usefulness, attractiveness and quality. In stating this, the guidance notes that the aim should be to achieve qualitative improvements to such facilities. More specifically to playing fields, PPG17 (para 15 iii) again reflects the desirability for a qualitative approach, indicating the acceptability of

development where it is for an outdoor sports facility of “sufficient benefit to the development of sport to outweigh the loss of the playing field”.

- 6.5. Therefore, whilst the overall area of external sports provision will inevitably reduce slightly as a result of the scale of development proposed, the quality of the provision will be improved. That allows a greater intensity of use all year round, ensuring that the facilities can appropriately cater for the continued needs of staff, students and local communities. Moreover, the Masterplan allows for the existing internal sports facilities to be further developed and enhanced, thereby providing comprehensive improvement to facilities across the campus in accordance with policy and guidance.

7 INTEGRATED TRANSPORT

- 7.1. The implementation of the 2001 Masterplan resulted in a significant increase in the use of public transport for those accessing the campus, and an on-going annual reduction in the car parking spaces provided on campus. Clearly, however, the scale of growth now anticipated requires the transport strategy to be revisited in accordance with Policy GDS.1/B11 and progress of the Joint Local Transport Plan, which includes the upgrade of showcase bus routes to the University as part of the Bath Package.
- 7.2. The proposed strategy is set out in detail in the Masterplan Report at Section 7. In summary, to encourage sustainable travel and maximise the land available within the campus for development and sports provision, it proposes to further develop the University’s Green Transport Plan and limit the amount of additional car parking to an increase of only 15%. Measures to maximise the opportunities for accessing the campus by other means than the car, and reduce the demand for car parking, include improved bus services (including a targeted shuttle bus), provision of cycle parking and routes, an increase in parking charges and improved enforcement, and increased incentives for car sharers.
- 7.3. The proposed strategy reflects the more strategic principles of Local Plan Policy T1, reflecting Government objectives advocated by PPG13 for addressing congestion, road safety, air quality, accessibility and quality of life. It also responds to approach to parking identified in Policy T26 by limiting the expansion of parking and encouraging alternative means of access.
- 7.4. The implementation of this strategy will allow the University to continue to grow in a sustainable manner without an unacceptable impact on the surrounding highway network. The provisions of the Masterplan, therefore, accord with the planning policies identified above.

8 DESIGN AND LANDSCAPE ISSUES

- 8.1. Policy GDS.1/B11 requires the Masterplan to provide for high quality design and landscaping that responds positively to the AONB and neighbouring areas, a significant part of which lies within a designated Conservation Area.

AONB

- 8.2. The land the Inspector recommended to be removed from the Green Belt remains part of the Cotswolds AONB. The Sulis Club site also lies within the designated AONB. National planning policy in respect of AONBs is set out in paras 21 to 23 of PPS7. It has the highest status of protection in relation to landscape and scenic beauty, and the conservation of that natural beauty should be given great weight in planning decisions. The conservation of wildlife and cultural heritage are also important considerations.
- 8.3. Consequently the PPS states (para 22) that “major developments should not take place in these designated areas, except in exceptional circumstances”. Furthermore, that “proposals should be subject to the most rigorous examination” and demonstrated to be “in the public interest”. It continues to state that the following matters should be assessed:
- The need for the development including national consideration and the impact on the local economy;
 - The cost and scope for developing elsewhere outside the designated area or meeting the need for it in some other way (i.e. alternatives);
 - The impact on the environment, landscape and recreational opportunities and the extent they can be mitigated.
- 8.4. RSS Policy ENV3 seeks to protect the natural beauty and wildlife and cultural heritage of designated AONBs and consider proposals which promote the understanding and enjoyment of their special qualities. Local Plan Policy NE2 follows a similar theme and states: “development that affects the natural beauty of the landscape of the designated areas of the AONB will not be permitted.” Exceptions for major developments are only allowed on the basis of national need and a lack of alternatives.
- 8.5. Whilst the Local Plan Inspector had no remit to modify the boundary of the designated AONB, he did make some very pertinent comments (para. 9.37) in respect of the limited contribution those areas to be removed from the Green Belt make to the AONB. Moreover, that the tests to be satisfied as set out above are similar in substance to those relating to the release of land from the Green Belt. He concluded that he did not consider the designation to be a reason for the Local Plan to prevent the development of University buildings in these locations.

- 8.6. It is implicit, therefore, that it is accepted within the Local Plan that those parts of the campus that were removed from the Green Belt, but remain within the AONB are appropriate locations for development. The Inspector did, however, emphasise the need for appropriate design and landscaping, and the potential to provide a more sensitive “landscape-led” relationship with the adjacent Bushey Norwood.
- 8.7. The 2001 Masterplan had already proposed a significant increase in the landscaping to the eastern boundary of the campus, and substantial additional planting was added following the construction of Woodland Court. The new Masterplan proposes to reflect the landscape character zones and enhance the parkland setting, reinforcing the buffer strip on the eastern boundary around any new development and generating woodland fingers reaching into the campus. Careful and detailed consideration of the height, mass and form of development in these locations will also be required, but it is apparent that the principle of development in the locations indicated within the Masterplan is accepted.

Conservation Area

- 8.8. The campus also lies adjacent to a conservation area, which includes the three properties owned by the University on North Road. The usual safeguarding policies stemming from the provisions of PPG15 apply that seek to preserve and enhance the character and appearance of the area. For example Local Plan Policy BH6 seeks the retention of key buildings and architectural/landscape features which contribute to the character or appearance of the Conservation Area.
- 8.9. The Masterplan recognises the significance and sensitivity of the Conservation Area, proposing that development in this location generally, and the proposed post graduate residences in particular, should be of a lower density, also highlighting the areas of significant landscape value in this location. This is reinforced by the requirement of Policy GDS.1/B11 to provide for high quality design and landscaping that responds positively to neighbouring areas. Therefore to protect the setting of the conservation area, detailed consideration will need to be given to the scale, proximity and design of development in this area.

Quality

- 8.10. The continued success of the University is in part reliant on the quality of the teaching and research environment that it provides, and the preparation of the Masterplan is testament to the emphasis the University place on ensuring that the future development of the campus is to the very highest design standards. Of course in planning terms this can only be judged as individual schemes come forward and must reflect the qualitative design principles of PPS1: Delivering Sustainable Development, but the University proposes the preparation of further design guidance for particular parts of the campus,

notably the Parade, and are establishing a Design Advisory Panel that would review all proposals relating to the campus.

9 OTHER PLANNING POLICY REQUIREMENTS

- 9.1. The usual generic development control and safeguarding policies will of course also apply in the determination of future planning applications, and these will need to be considered at that time. Notably, however, there is a plethora of existing and emerging planning policies relating to sustainable design and development.
- 9.2. Local Plan Policy ES2 seeks the incorporation of measures to achieve energy conservation and environmental resource protection. These requirements will be strengthened in the preparation of the LDF in accordance with emerging national policy, e.g. the PPS1 Draft Supplement Planning and Climate Change, and the provisions of the RSS. In particular, RSS Policy SD1 sets the regional objectives for stabilising the ecological footprint by focussing on targets for consumption and emission levels, as well as seeking an integrated approach to transport and development. Stemming from this, Policies SD2 – SD4 identify specific measures to reduce the impact of development on climate change (to reflect national targets for reducing CO₂ emissions), enhancing biodiversity and creating sustainable communities.
- 9.3. The Masterplan is central to the University's overall environmental strategy in its proposals for biodiversity enhancement in the landscaping, the use of sustainable urban drainage systems, building to the highest BREEAM 'Excellent' rating, refurbishing the existing building stock to reach the equivalent of a BREEAM 'Very Good' rating, and exploring opportunities for on-site renewable energy generation.
- 9.4. Indeed, the University has already invested in combined heat and power plant and the capacity of this plant will be increased over the period of the Masterplan. The University will also investigate the opportunities offered by biomass as a fuel to power its CHP plant.

10 CONCLUSION

- 10.1. The above assessment highlights that the Masterplan proposals accord with the key policies of the Development Plan and relevant national Planning Policy (referring specifically to the PPGs and PPSs identified above). It can, therefore be endorsed by both the University and B&NES as an appropriate framework for the future development of the University, and specific proposals that come forward to deliver key elements within it, should receive the benefit of a planning permission in a timely manner.