

**Response to University Masterplan consultation March 2018**

**Overview**

Bath Preservation Trust[[1]](#footnote-1) would like to respond to the University of Bath masterplan consultation in a way that is constructive for the development of the success of the University within the City, and which could therefore be adopted as a Supplementary Planning Document to inform the Local Planning Authority’s decision-making. This is however frustrated by the fact that the Masterplan (as presented in the consultation) does not quantify the growth ambitions for the University, in terms of student numbers and associated academic space, nor does it address constructively the challenge for Bath to provide sufficient and affordable student accommodation without having a grossly distorting effect on the local housing market.

We have answered the questions as set by the consultation bit cannot see this as a genuine masterplan until the quantification of growth ambition is spelt out and the spatial challenges that it creates properly addressed.

**1. Understanding the constraints of the Claverton Campus, which of the following additional facilities would you prioritise to be included? Education & Research Facilities/Car Parking/Green Space/Purpose Built Student**

**Accommodation/Sports/Training Facilities.**

We would prioritise the addition of purpose built student accommodation (PBSA) in order that the university accommodates a higher proportion of the 18,000 students that attend the university (currently the university houses only 3,278 – 18%- of these students). Once the burden of campus versus non-campus accommodation has been made more evenly balanced, the university could then focus on academic and sports facilities.

**2. Are there any facilities not listed above which you feel should be included at**

**Claverton campus?**

No.

**3. Although the Eastern Playing Fields are in an Area of Outstanding Natural Beauty there is the potential to develop here. Which (if any) of the following do you feel would be acceptable on this site? Education & Research Facilities/Car Parking/Green Space/Purpose Built Student Accommodation/Sports/Training Facilities.**

In order to intensify the campus to achieve the above balancing of city versus campus accommodation burden, we welcome development on the campus in the areas identified, particularly the Eastern car park and potentially on the playing fields though we acknowledge your ambition to retain the pre-eminence of the facilities at the Sports Village (given its national importance) and to maintain the environmental quality and green infrastructure of the campus. The loss of tennis courts on the Avenue would appear to be acceptable but development at this location would need to be sensitive, screened and low rise to take account of the domestic scale of the adjacent housing area.

Notwithstanding the above, in our view the University’s most recent developments have resulted in cumulative harm to the Outstanding Universal Value of the WHS in that developments on the west and south west parts of the campus are clearly visible on the once green wooded ridge of the bowl of the city and they have urbanised the ridge in this area. ‘The green setting of the city in a hollow in the hills’ is a specific attribute of the OUV of the city. Avoidance of similar harm to the city's green setting MUST be a priority in any proposed densification of the campus, which is another reason why we favour sites well within and towards the east of the campus setting.

**4. Are there any facilities not listed above which you feel could be included on the Eastern Playing Fields?**

No.

**5. In order to accommodate more development on campus there is the option to provide decked car parking. What do you feel are the issues presented by the introduction of decked car parking? Ease of Access/Safety/Environment/TrafficFlow/Any Others.**

* We are pleased that the university is considering using its air space in order to increase the developable campus footprint;
* Rather than decked car parking as a priority, we would like to see consideration of low rise accommodation units or academic buildings with ground floor parking on most of your car parks; this would retain a similar level of car parking but use the air space above the car parks effectively. This has recently be done by the private sector for the benefit of Bath university students on a more sensitive and less appropriate site at Bath Cricket Club and we do not see why this cannot be achieved on your own site;
* In addition, we believe that via sensitive infill and extension (though not by getting any closer to Bathampton Camp), development could be intensified at the Eastwood area of campus to create extra accommodation.

**6. Although the Sulis Club is currently in the Green Belt, there may be opportunities in the future for development to take place here. Which (if any) of the following do you feel would be acceptable on this site? Education & Research Facilities/Car Parking/Green Space/Purpose Built Student Accommodation/Sports/Training Facilities.**

The Trust usually campaigns for the retention of the Green Belt, so any type of student village or other development at the Sulis Club would need to be robustly detailed and justified with a thorough examination of possible landscape/AONB harm. It would also need clear justification in terms of housing a GREATER PERCENTAGE (not just a larger number) of Bath University students. The retention of this space as green playing fields is optimum however we would reserve our judgement on this issue and retain an open mind as to options.

**7. With a finite amount of space at the Claverton Campus, it may be necessary to create some off-campus facilities in Bath. Which of the following would you feel acceptable elsewhere in the city? Purpose Built Student Accommodation/Education & Research Facilities /Social & Recreational**

With the exception of the Sulis Club (above) the consultation panels are silent on the matter of off-campus development and what locations might be sought for it. The University argued strongly, at the Previous Core Strategy Examination in Public, to have the potential to expand teaching capability within the City (off-campus) and concessions were made by B&NES over this. We would therefore expect to see these ambitions spelt out in the masterplan, together with any potential to expand in terms of student accommodation or other teaching potential on sites further afield. We note that the previously permitted development at Pinesgate has not to date been proceeded with by that applicant, and we wonder whether this has potential as an available site for the university to acquire for student and teaching facilities, given that was the basis of the permission.

**8. Any other comments?**

The Trust welcomes the opportunity to consult on this masterplan and would welcome further pre-application consultation with all potential developments on or off campus.

We are aware that this consultation represents a review of the existing masterplan. However we regarded the masterplan consultation boards to be disappointing in detail, given the very significant pressures upon the City of Bath and the need for the University, with Bath Spa University and B&NES, to be seen to be seriously addressing the challenge of student housing in Bath in advance of the finalisation of the Local Plan.

**Proposed growth aspirations and student numbers**

As stated earlier, we do not believe that a meaningful masterplan can be produced without a detailed breakdown of the growth targets and student numbers that the university is looking to achieve during the masterplan period. The masterplan does not state what the growth aspirations are nor does it indicate a % target for accommodating students on-campus in future. We understand that this information will be available at the Core Strategy Review but we fail to understand how any type of campus development masterplan can be devised or implemented without an understanding of the numbers first; the order appears to be wrong.

In the absence of such an analysis, it appears the University is assuming that the City of Bath can and should meet the housing needs of the University’s growth targets. However, it has been clearly proven in previous years (when undergraduates arrived to find there was insufficient available accommodation), and in current years with the growth of market-led PBSAs as well as the purchase by overseas students of newly-built housing stock in the city, that this is not a realistic assumption. Further, it is legitimate under planning guidance for authorities with significant environmental growth constraints to fail to meet growth targets. So the University cannot expect the City to provide for its needs.

We would expect the masterplan to show:

* An aspiration to house a particular % of students (considerably higher than current) in affordable rented accommodation provided by the University (Durham University, in another ‘challenged’ historic city, houses 48% of its students);
* An indication of where, on or off-campus, any new student housing will be provided: and
* A recognition that the University has a responsibility to achieve such a target.

Without this, we would expect B&NES might have the right to refuse any plans to expand either car parking or teaching accommodation further.

Clarity about the housing of students would inform both your own development plans on campus but also give developers and B&NES a clear idea of where development pressure will be and whether PBSA schemes from the private sector coming forward are needed or not, thereby aiding plan-led decision-making.

We believe that if the university wishes to achieve growth targets that will impact on the available land in the city earmarked to contribute to strategic growth (housing and employment) then the university must:

1. shoulder a considerable burden of development on campus (i.e. intensify the built campus – see above) and/or
2. temper those growth targets according to what the city can accommodate without the population or land use of the city becoming skewed and the balance of communities being impacted negatively.

We also think that the University could inform its own case by benchmarking comparators from other Universities in or adjacent to historic towns, particularly those with a very high-cost housing market; student population as a % of those populations: and % of accommodation that those universities provide on and off campus.

At the Core Strategy Review we will be strongly urging B&NES to tackle robustly the issue of purpose built student accommodation development; in our view a very small number of sites should be specifically allocated to possible PBSA’s development (based on the submission of growth data from the universities plus an agreed % of campus accommodation, existing or to be developed) and any other speculative brownfield PBSA development should be refused.

1. The Bath Preservation Trust was set up in 1934 to safeguard the historic city of Bath, now the only complete city in the UK afforded World Heritage Status. The purposes of the Trust are to:

   * encourage and support the conservation, evolution and enhancement of Bath and its environs within a framework appropriate both to its historic setting and its sustainable future, and;
   * provide educational resources, including museums, which focus on the architectural and historic importance of the city.

   The Trust does this by:

   * + Campaigning and providing expert advice and opinion of planning applications, planning policy and legislation, and other matters affecting the World Heritage site and its environs;
     + Running museums with specific themes and collections relating to the Georgian period, its economy, its buildings, social life and personalities;
     + Providing educational resources, lectures, talks and events for all ages, in particular relating to the Georgian buildings in Bath; and
     + Having the active membership of involved and concerned subscribers.

   The Trust is a registered charity supported by over 1400 members, who share a passionate concern and interest in the city. We receive no government funding, but are financially supported by our members, by grants and donations, and by income from our museums. [↑](#footnote-ref-1)