



Summary

Transition Bath formally objects to the planning application [14/00049/FUL](#) to build 266 homes in Keynsham on the grounds that the development is being built to near minimum standards and that a number of statements in the developer's Sustainability Statement appear to be factually incorrect or at least misleading:

1. The developers state their fabric first approach will not require the occupants to undertake expensive maintenance in future; we feel this statement to be false given these homes will require extensive retrofitting to meet the UK government's 2050 carbon commitments
2. The developers claim the buildings are orientated to maximise solar gain and reduce heating consumption; we can find no clear evidence for this in the developers plans
3. The developers spuriously claim a 4% positive CO2 benefit from leaving 20% of the site to open space; given the whole site is currently green field we feel that logically they should also claim a negative 20% CO2 'benefit' for the remaining 80% of the site substantially reducing their carbon claims below building regulations 2010 Part L
4. The developers appear to infer solar panels are unreliable and use it as a rationale for not installing them; they provide no evidence for this, and we believe this excuse for not installing panels to be untrue. We feel the developers should substantiate this claim or resubmit their application omitting this claim if untrue or ideally install solar panels
5. We also object to the lack of provision for allotments and the use of reconstituted stone

The application makes no attempt provide low energy homes, building to minimum standards and increasing the chances of fuel poverty. It appears this is a boring, bog standard Barratt's development which has nothing to commend it, and in the words of Eric Pickles, Secretary of State for the Department of Communities and Local Government, this development is like much "homogeneous, pasteurised housing" being built across the country by large developers.

Detailed Response

1. Factually incorrect statement: Dwellings do not require expensive maintenance and repairs

Sustainability Statement 3.6:

3.6 It is proposed that the new dwellings at K2A will aim to provide CO2 emissions reduction for their lifetime by incorporating design, materials and services that do not require the occupants to undertake expensive maintenance and repairs. This fabric first approach and CO2 emissions reductions for the dwellings are discussed below.

The proposed designs are being built to minimum building regulations, namely 2010 Part L. The UK has a commitment to reduction carbon emissions by 80% by 2050, which will require all homes built to Building Regulations 2010 Part L to be further retrofitted by 2050 to meet this standard. Given the proposed designs, it appears that to meet 2050 standards internal wall insulation would need to be



installed sometime between now and 2050, which is expensive, disruptive and reduces internal floor area. We feel that this is inconsistent with the developers statement that the homes “do not require the occupants to undertake expensive maintenance and repairs.”

2. Factually incorrect statement: Dwellings are orientated to make use of solar gains

A number of statements throughout the developer’s submission claim the homes are orientated to maximise solar gains thereby minimising energy consumption. There appears to be no evidence for this in the submission.

In general to make use of solar gain to reduce heating demand, homes should be orientated in a southerly direction in an arc from south east to south west and that windows on the south facing side of homes should be significant larger than north facing ones.

The planning application seems to have homes orientated randomly rather than orientated to maximum solar gain and many of the house designs have little difference in window area between north and south elevations. We therefore feel the developers have failed to justify their various statements that the homes are design to maximise/make use of solar gains, at best the claim appears spurious. We also feel that the layout fails to follow guidelines in B&NES’s council’s Sustainable Development SPD.

3. Factually incorrect Statement: Open space will contribute to CO2 reduction

8.7 The open space within the site development contributes CO2 emissions savings of 17,603 KgCO2/yr which provides an additional 4% beyond the operational baseline for the development determined by the TER.

We feel the developers should not be able to claim credit for any CO2 benefits from the 20% open space provided on the site since the site is currently green field land. The reverse should be true, if they are correctly assessing the carbon impact of their development they should adjust the TER/DER for the 80% of greenfield land which is being lost. We calculate this loss as 82 CO2T/yr, which following the developers logic would imply a CO2 loss of 19% compared with TER, bringing the development below 2010 Part L building regulations.

4. Factually incorrect statement: bolt-on technologies may fail, so renewable energy is not provided?

10.2 As set out in section 3, the CO2 emissions savings will be achieved through fabric energy efficiency measures, demonstrated by national calculations methods, enabling these savings to be achieved throughout the life of the development. This approach reduces the risk of failure with bolt-on technologies that may fail and further risk that the occupiers may not undertake repairs.

In section 10.2 of the developers sustainability statement, the developer makes 2 claims:

1. That theirs is a fabric-first approach



2. There is a risk of failures in bolt-on technology which may fail

Given the homes are only being built to minimum building regulation standards we feel that this is not a fabric first approach but rather a 'minimum cost maximum profit approach' so we feel the developers statement is not true. We believe a 'fabric first approach' which would meet future carbon obligations would need to meet Code for Sustainable Homes Level 5 fabric requirements or ideally be built to Passivhaus standards.

It is not clear what the second part of 10.2 relating to 'bolt-on technologies' actually means, but we interpret that the developer is probably referring to solar thermal and solar PV. The inference being that they don't want to install solar panels to reduce CO2 emissions because they are likely to fail and might require the owners to undertake repairs? If this interpretation is correct we feel that this assertion is false, we are not aware of any evidence nationally that solar panels are inherently unreliable. We feel B&NES council should require the developers to provide supplementary evidence that solar panels are inherently unreliable before the application is allowed to go ahead, otherwise we feel the developers should be asked to reapply for planning permission but with this inference removed from the application. Ideally we would like the developers to install renewable technologies – for example solar panels on the properties to further reduce their carbon impact and to reduce the home owners' energy bills. Economically, given the economies of scale on a large new build site solar PV panels are very viable.

5. Other Issues:

- No allocation of space is made for allotments
- The developers have submitted elevations which appear to suggest they plan on using reconstituted stone on some of the houses; experience from other developments in Bath suggest that reconstituted stone soon tarnishes and doesn't stand the test of time. We feel that the developers should be required to use real Bath stone