



Transition Bath would like to reiterate their objection to this planning application ([15/02162/EFUL](#)) whose recent revision appears not to have included an increase in the number of affordable homes above the previous 10% being offered. We object to this as it will mean that B&NES will need to build a further 160 homes above the 13,000 currently required in its Core Strategy, these additional homes will mean less amenity space and will almost certainly increase the pressure build on the Green Belt and agricultural land.

We would like to draw the planning department's attention to the [High Court Ruling of 31 Jul 2015](#) which squashes the Vacant Building Credit, the mechanism being used the developer at the Bath Press Site to reduce their affordable homes obligations from 30% to 10%.

Additionally, we would hope the developer doesn't try to justify less than 30% affordable homes on the basis of Viability. No other recent major City Centre development has offered less than 30% and most have offered 40% suggesting there is no Viability justification for the developer not meeting their affordable homes obligations under B&NES's Core Strategy. We would hope the council don't accept a Viability submission with inflated build costs and deflated sales prices. If an excess price has been paid for the land which makes 30% affordable homes unviable, we feel this is the developer's problem and they will have to accept a reduction in their 20% profit margin. It is their fault if they have paid too much for the land; all other recent developers on other sites are managing to deliver between 30% and 40% affordable homes viably.

We cannot see any valid justification for the developer delivering less than 30% affordable homes.