



Transition Bath broadly welcomes the content of the Placemaking Plan and the opportunity to provide feedback via this consultation.

We have split our feedback into 3 main areas which broadly reflects the structure of our groups: Food, Transport and Energy. In summary our feedback is as follows:

Food

The new policies on rural issues, particularly agriculture, on dispersed local shops, on food growing opportunities, etc. are very good to see. However, the sections on residential development and urban design don't seem to have picked these approaches up. It may be that the different sections were written in isolation, but it gives the impression of lack of joined-up thinking. We would like to see daily needs shopping, edible landscapes, etc., built into those policies. Key changes we recommend for the Plan include:

- Provision for allotments in the Central Area and Riverside developments (1.36-1.53) – currently none are required. On-site allotment provision as per LCR9 Option 4
- Smaller 'daily needs' shops distributed throughout the Riverside development, providing accessible fresh food for residents and workers, reducing car usage and therefore carbon emissions, pollution and congestion; this is preferable to a new centre for mass market national retailers
- We feel that better use of the rooftops could be made, for example with edible micro gardens or the use of solar PV on existing buildings as well as new developments. This would also help reduce the monolithic landscape which has been developing around Southgate, Bath Western Riverside, etc, which is visible from the surrounding hills
- Fast Food Outlets (2.139): These impact on other groups apart from school children e.g. university students, and it would be worthwhile drawing on planning experience from other cities
- Orchards: we would like to see a greater promotion of orchards and fruit growing trees throughout the Placemaking Plan particularly as part of large housing developments
- We recommend learning how other local authorities, e.g. Brighton & Hove, have developed policies and procedures to inject local food growing and urban agriculture into the planning process.

Transport



We very much welcome and support the aim of 'achieving better quality places as the physical setting for life', and that it 'is about creating good places that promote people's health, happiness, and well-being'. That the emphasis on 'well connected places' and use of 'sustainable modes of transport' especially walking and cycling is very good.

General comments

- The city of Bath should be viewed as the whole 'World Heritage Site', which it is, rather than just the historic city centre.
- The policy seems to have big plans for additional city centre parking (1.73), we feel this is incompatible with the council's congestion and air quality aspirations, and that this policy should be removed in favour of park and ride capacity, public transport, walking and cycling (see comments on Air Quality Management below)
- More emphasis needs to be made of being within easy reach of the bus network and the need to have a well-connected bus network
- We strongly support that sustainable travel modes take priority, and that walking and cycling are stated as highly important, we would like to see it stated that the pedestrian and cycling routes should be provided along desire lines and be of a high quality with segregated cycle tracks
- That car parking related to developments needs to be limited to disability users, and minimal operational needs, only
- There is no mention of provision for Car Club car parking spaces anywhere in the plan and further thought on future integration of anonymous vehicles needs to be included. That provision of parking is kept to the absolute minimum and disassociated from the residential units if possible, future model shifts from anonymous vehicles/Car Clubs might lead to a 95% reduction in parking requirements, the current policy which is short sighted needs to take this into account
- There should be minimum standards for the provision of electric car parking points on all large new developments, and the requirement to include cabling to allow the charging of all vehicles in future
- Any substantial new development needs Proper Sustainable Travel Plans, particularly for commuting using sustainable modes of transport, also Car Sharing, Taxis and multi modal.
- We are concerned that Neighbourhood Hubs / Local Centres are not properly represented within the strategy. Dispersed Local Shops is not the same, and only London Road seems to have been considered. We have made a suggestion in the detail section below to include a new section 'CR6' to deal with neighbourhood hubs? Recognition that most people who live in Bath live within a 10 minute walk of a Neighbourhood Hub. The investment of £1 million on the London Road Local Centre is very welcomed and this should be a commitment or all neighbourhood hubs, with the larger ones such as Moorlands road getting £5 million.



- Home Zones is only mentioned for elderly and supported needs, this needs to be the intention for all residential areas especially those with families and children, and near schools
- We would like to see 'Car Free' developments encouraged (examples [here](#) and [here](#))

Energy (Buildings, Renewables)

Overall we agree with the Energy Policy, with the following comments:

- Despite restrictive government regulation, we think there should be a separate policy section for 'new domestic dwellings' – currently absent
- Allowable Solutions should be avoided if possible, and if required then should be delivered locally
- We strongly support the imposition of a 20% 'Merton Rule'
- Forward thinking policy to include the support of roof-integrated solar PV, MVHR and shading to avoid summer overheating needs enhancing
- The district heating criteria needs tightening, as developers dismiss the requirement in planning applications without justification. A developer should be required to provide a well-defined 'district heating' assessment as part of any large development
- Energy efficiency standards for non-domestic buildings should be enhanced, particularly for new school buildings and significant extensions

Miscellaneous

- **Fracking:** Transition Bath objects to fracking as it will only increase the amount of carbon dioxide in the atmosphere, and we feel should only be allowed if combined with Carbon Capture and Storage
- **Air Quality Standards** in the consultation are very weak, as mentioned in the Transport Section above. We feel that this section needs completely rewriting to actively address this issue as previous policies have had no impact on pollution and the current proposals seem to be a continuation of the status quo. A more proactive approach would also have impacts on other areas of the document. We would like to see proposals to include
 - A 'low emissions zone' – excluding the most polluting vehicles (diesels) from the centre of Bath
 - Incentives and disincentives to encourage low emissions vehicles (charging points and low parking/permit charges for electric and plug-in vehicles) and to discourage high emission vehicles (prohibition, high parking/permit charges)
 - Encouragement of car clubs, and further thought put into how this is compatible with future anonymous and electric vehicle developments
 - Removal of parking from city centre commercial developments, which is currently encouraged and set out in the document, which we feel is incompatible with the rest of the document. City centre commercial developments should only provide parking for the disabled, car clubs/pool



cars and shift workers – the remainder should be serviced by walking, cycling, public transport and Park & Ride. Providing additional parking in these developments is only going to increase congestion and pollution.

Detailed Feedback

We have included page references in this feedback to try to remove ambiguity and so we can provide feedback where section numbers weren't available for reference in the document. These references relate to the online version of the document, and not the printed version of the document provided to the council's cabinet which is quite different in format and content.

Page Ref	Reference	Comment	Change Requested	Supporting Documents
p2	11.	Our comments contribute to most of the 7 strategic objectives		
p8	Maps page 24,25 of the Master Plan Vision report	These maps indicate 2 edible walls along the river. This is the only reference we could find to locations for informal food growing, referred to in pp.260-262	Different types of informal food growing, such as rooftop gardens, edible landscaping and edible walls should be encouraged along the river corridor developments. Cordon fruit trees could provide living 'railings'.	
p8-25	1.50-1.51	Options 1-3 indicate the provision of 800-900 new dwellings, yet there is no reference to commensurate provision for allotments. On the basis of 2 persons per dwelling, c.400 allotment plots should be provided.	The lack of available, suitable land for allotments in the area may require innovative solutions such as rooftop allotments and access to former private allotment sites.	
p8-25	1.51	Options 1-3 indicate one large retail area, rather than 'daily needs' shopping as indicated by CR5.	"Daily needs" shopping will be accommodated throughout the River Corridor development to allow residents and workers to shop for fresh food on a daily basis.	



			This ties in with our request for a new 'neighbourhood hub/local centres section'	
p25-26	SB3	para 3. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.	Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g. water storage, solar power and edible gardening.	
p26	SB3	para 10. Where is the Bath Pattern Book? Is it in draft form, and will there be an opportunity to comment on it? Will it allow multi-purpose roofscapes? It is referred to numerous times in the document, but we can't find an online copy of it?	The Bath Pattern Book should include mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.	
p28	North Quays 1.72	Agree - Beautiful new pedestrian and cycling bridge.	Also Suggest cutting Green Park road from being a through road to access only	
P29	North Quays SB4	3. Agree - With being 'pedestrian friendly' and directly connected to the river 10. Disagree	- 10 Needs to provide direct, desire line based routes for pedestrians AND cyclists, with separated space for cyclist on the main through routes	
P29	SB4	10. Strongly Disagree. Providing parking will encourage bring vehicles into the city.	As suggested in 1.72 Green park to be cut off	
p29	SB4	5. Strongly Agree -	This needs to include high quality access routes for pedestrians and cyclists	



P30	North Quays 1.73	Disagree – No basement parking in any option –this will just generate motor vehicles to enter the city		
p28-31	SB4	para 8. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.	Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.	
p32	SB5A	7 Strongly Agree 8 Vehicular access should be minimized to service vehicles and perhaps visitors to reduce congestion in Bath and encourage other modes of transport in the centre of town. We would also like to see pedestrian access all along the river's edge. 11: Disagree	7 This needs to include high quality access routes for pedestrians and cyclists Point 8: Could you introduce new text to represent our request than vehicle access to the site is minimised (filtered permeability') , and could you remove the word 'preferably' from the last sentence? 11 access by walking, cycling, public transport should be encouraged, car parking should only be provided for car share and car club cars only	
p31-34	SB5A	paras 5 AND 6. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.	Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.	



p34-34 1	South Bank		1.85 – 7000 sq m of parking should not be provided, as it will encourage car use, congestion and pollution	
p36-36	SB6	Sydenham Park, para 6: The "mass" of any new building will result also in commensurate-sized roofscapes. These will offer opportunities for climate change mitigation, e.g. solar power, edible gardens, etc.	Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.	
p36-36 1	SB6: Green Park Station West	We strongly agree with point 4.	Point 2: this needs to include making the junction with Bougham Hayes a pedestrian and cycling priority junction with safe segregated routes for each along the desire lines	
p36-36 2	SB6: Green Park Station West		GDP Point 3: cycling should have its own segregated tracks and not shared with buses	
p36-36 3	SB6: Sydenham park	We strongly agree with points 1 and 6	Sydenham Point 1: could you add 'and cyclist' after the word pedestrian?	
p36-36 4	SB6: Sydenham park		Sydenham Park Point 6: Pines Way should be removed from being a gyratory system	
p36-41 5	SB6: Sydenham park		Sydenham Park Point 7: Limited to disability users, and minimal operational needs, only	
p41 1	SB13		If the river path is not to have any lighting then there needs to be segregated cycle route to the north of the river from Locksbrook Road to	



			Monmouth Place for safe night time cycling	
p42 1	SB9	Point 9: we strongly agree with the statement that improvements in cycling and pedestrian experience on the Lower Bristol Road are required	Point 8: could you include the words 'for cycling and pedestrians' before the words 'to Oldfield Park....'	
p42 2				
p42 3				
p44 1	SB8	- 4 Strongly agree – A commitment to create a new cycling and pedestrian bridges over Windsor Bridge Road and Lower Bristol Road should be included		
p46-46 1	Locksbrook road	Agree – 'accessed by a comprehensive sustainable cycling and pedestrian network'		
p48 3	SB11 p47	1.21 Strongly agree with pedestrian and cycling connections	add that it is not only for 'local communities' but also those working there or visiting	
p48 1	SB11	Needs to be segregated pedestrian and cycling routes, that follow the desire lines and with safe crossing points	- 6 – commit to, rather than saying 'wherever practicable'	
p48 3	SB11	Point 8: we strongly agree		
p59	1.131	Retention of RUH disused allotment site, for staff and therapeutic use, possibly open to local residents via Greenbank Gardens	Designate as Local Green Space	
p72-173	SK8	Para 1. Ancillary uses should include repair, re-use, and upcycling. Not only would this conform to the waste hierarchy, but could provide training and employment opportunities.	List repair, re-use, and upcycling as potential ancillary uses.	
p173	2.6	Full support for housing that promotes health and well-being. (2.6 bullet point 4)		



p174-176	H1	Qualified support: Gardens should include raised beds for residents to do their own gardening. Grounds should include a vegetable plot so that meals can include fresh vegetables (not the tinned vegetables and powdered soups provided in some residential units.) There should also be a 'daily needs' shop within reasonable walking distance.	Modification required: Facilities required for on-site production of fruit and vegetables to provide residents with a healthy diet. Gardens should include residents' own gardening space, including provision of raised beds. Walking distance to a 'daily needs' shop should be identified.	
p176	H1	Strongly agree external areas being 'home zones'		
p177	H2	Strongly agree – Higher density and good local facilities		
p178	H3		1v – needs to say priorities sustainable modes of transport, walking, cycling then PT	
p179 1	H4		1 – needs to say priorities sustainable modes of transport, walking, cycling then PT	
p179 2	ED.2B		1 – needs to say priorities sustainable modes of transport, walking, cycling then PT	
p192	2.86	Fully support this approach.		
p193	RE1	Full support.		
p195 1	2.97	Priority should be given to accommodation for agricultural workers.	Priority should be given to accommodation for agricultural workers.	
p195 2	RE3	Qualified Support: Concerned that (iii.) conflicts with (ii), i.e. could allow loss of 9/10ths of agricultural function.	Modification required: Change "wholly" in (iii.) to "significantly".	
p196	RE4	Full support.		
p197	RE5	Full support.		



p198	RE6	Qualified support: Conversion of buildings should not conflict with RE4.	Modification required: Qualify by making reference to RE4.	
p202	2.121	2.121 refers to the GVA Retail Assessment carried out in 2014. As with its predecessor, it identifies the Bath demographic as predominantly "Urban Intelligence", i.e. concerned for social and environmental issues, interested in sustainable food production (see p.34 of http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Retail/retail_strategy_-_03_annex_b.pdf) and yet it still advocates more mass market retailers and more parking (p.18)		
p203	CR1	Qualified support, as it appears to promoting local shopping, easily accessible by residents on foot, by cycle or public transport.	Modification required: Priority should be given to shops providing 'daily needs', e.g. fresh food	
p203	CR1	Qualified Agree		
p204	CR2	Objection, unless there is public consultation on the precise thresholds of floor space (cf. comment on 2.121)	Modification: "There will be public consultation on the precise threshold of floorspace following completion of Stage 2 of the 2014 Retail Study" Modification: we also feel that a full traffic assessment needs to take place, which should assess whether the development has an impact on carbon emissions and pollution by the additional travel caused by these developments	
p208	CR5	Full support. Local shops should be sufficiently dispersed to meet residents' daily needs (including fresh food), i.e. within easy walking or cycling distance, or by bus.		



p209	2.139	School children are not the only people who might be exposed to unhealthy foods from fast food outlets. Bath has a large number of university students, and areas of the city fall within the 20% multiply-deprived populations nationally.	Introduce measures such as the requirement for Health Impact Assessments and control the proliferation of class use A5 premises, as other local authorities have done.	LGA: Obesity and the Environment: regulating the growth of fast food outlets
p210	2.142	Fully support the introduction of a policy to encourage new markets (Option 1) and retain existing markets (Option 2). The objective should be to increase the availability of fresh, preferably local, food.		
	CR6 – new chapter?	<p>There is an important chapter missing which needs to cover all local centres / neighbourhood hubs within Bath. Bath is very lucky to have lots of neighbourhood hubs, Moorland Rd, Weston, Larkhall, Twerton, Southdown, Chelsea Road, Bear Flat, Julian Road, Widcombe, London Road, Bathwick and more.</p> <p>Our group has identified that most people living in Bath live within a 10 minute walk of a neighbourhood hub. We would like to a section on the need to support, improve and invest in these areas.</p> <p>To do this there needs to be good provision for walking, cycling and public transport so that these are the transport modes of choice, rather than using the car, for accessing these areas.</p> <p>Improving the public realm within these areas, creating local identity and supporting local traders to thrive, within vibrant centres</p>	Could you include a new section for local/ neighbourhood hubs?	Shoppers and how they travel: Livable Neighbours Sheet LN02



p221	UD.1	Strongly support: We strongly support emerging policy UD1, in particular “ <i>iii. Development should make connections – by foot, cycle, public transport and by car – in that order. Streets and Spaces must be legible</i> ” and “ <i>vii. Buildings and spaces should be designed to be energy efficient.</i> ”	Could you add in connections by foot and cycle need to be made along <u>desire</u> lines?	
p222 4	UD.3	Strongly support: We strongly support emerging policy UD3, in particular “ <i>i. Designed for ease of walking and cycling and provide safe and quality routes.</i> ” Viii/ix/: In recognition of climate change and the better insulation in more modern homes, could the document include a reference to summer overheating, which is a problem with the current Bath Western Riverside designs which the residents are complaining about. We feel that avoiding summer overheating of buildings with integrated external shading will become almost as important as insulation in properties going forward. Passive ventilation is only part of the solution and is more applicable to large non-domestic buildings. Ix is not that easy to understand	ii– change to ‘semi permeable’ ie allow walking and cycling not cars. Also along desire lines Could you reword viii/ix to reflect to cover the more general issue of summer overheating?	
	UD.3	Would UD.3 permit urban agriculture, informal food growing spaces, mini-orchards? These would seem to address issues (vi.), (vii.) and (ix.)		
p222 6	UD.4	iii – Highly agree From an aesthetic and sustainability perspective we would like to reduce the ‘car dominance’ on streetscapes; many modern urban developments are dominated by cars parked in front of buildings. We would like to see parking	Walking and cycling routes should take priority over on street car parking. Cycle parking needs to be provided Could you reflect our comments in the emerging policy? e.g. xii. Avoid car dominant frontages by reducing the need for car ownership	



		minimized and hidden as much as possible, to support this we feel that local services like schools, small local shops and public transport need to be provided in order to reduce the demand. Additionally, where cars are required, the need for second cars should be provided by Car Clubs.	with the provision of local services and Car Clubs	
p228	UD.8	Strongly support: SMART lighting particularly if it leads to energy saving		
p233	2.225	Final bullet point: This is the only positive reference to orchards in the document, other than inclusion in a list of habits under NE3.	Orchards should be treated as food sources, not just as habits. As such, they should be promoted and protected? Under LCR8. Orchards can be integrated into urban landscaping, playing a role in climate change mitigation.	
p252	LCR3	Building for Schools	New schools need to be designed and built to the benefit and encourage sustainable transport modes as the core means of travel to school for pupils and staff. We would also like to see them meet minimum as-built energy performance standards e.g. DEC 'A' ratings, as the current recently design buildings don't do this (Verco 2013 Schools Energy Survey) and rate very poorly compared with their Victorian counterparts on a CO2/m ² energy usage basis.	
p255	LRC5- 3	Strongly agree		
p261	LCR8	Strongly support: agree with wording on allotments		



p262	LCR9	A minor amendment to the main text would be to include orchards in the list of growing spaces to be provided within developments	Brighton & Hove Council include questions about food growing space in their planning application questionnaire. They have also been able to get developers to take some innovative approaches to food growing: See link.	Brighton & Hove City Council: Food Growing Planning Advice Note
p262	LCR9	Object: Given the shortage of allotment land in Bath and long waiting lists we urge the council to adopt 'Option 4' requiring developers of large developments over 140 homes to provide on-site allotments, 'Option 5' would be a less acceptable alternative	Given on all 3 MOD sites, while recognising the need for allotments, the council has agreed a financial contribution instead without plans for delivering allotments. We think there should be a Grampian condition imposed on all large developments to ensure allotments are built on-site or nearby.	
	ST1 to ST8	<p>Although we support general principles of ST1 to 8, particularly the modal shift to walking, cycling and public transport we feel it could be more positive and future looking. We also feel that the council is failing to address the issue of traffic pollution which is above EU recommended levels in Bath, and has not been improved in the last 10 years. In particular we would like to see the following:</p> <ol style="list-style-type: none"> 1. New standard alone sections walking (i.e. a separate 'ST section), cycling and public transport 2. Integration of car clubs woven into the policy to reduce demand for parking and second cars. The policy should include forward thinking proposals which should take into account the potential disruptive changes from 	<p>The policy should be updated to include more proactive measures on reducing pollution and congestion.</p> <p>The policy includes no mention of Car Clubs or electric vehicles.</p> <p>It should be assumed that any new development is likely to increase congestion and therefore pollution, and that this will act against any policy to reduce pollution.</p>	



		<p>antonymous vehicles in the next 10 to 20 years, with the potential like Car Clubs to reduce demand for car parking by up to 95%.</p> <p>3. The promotion of electric and plug-in vehicles with requirements for minimum numbers of electric charging points for all new developments, and cabling to allow future access for all vehicles to charging points</p> <p>4. A positive policy with respect to pollution if cars must be driven: positive incentives for low pollution vehicles and disincentives for highly pollution vehicles. Measures could include a low emissions zone, higher parking/permit charges for diesels (and lower ones for electrics)</p> <p>5. Provision of local services to avoid the need for transport</p>	<p>The council should be aiming to reduce traffic pollution below EU recommended levels, nothing in the whole document seems to address this?</p>	
p263-263 1	ST1 - 1	<p>Qualified agree - That removable of congestion does not mean providing more road space for cars to drive quicker or that traffic management is not a substitute for proper segregated provision for pedestrians and cyclists, and that assisting the integration of all forms of transport does not mean more cars and lorries</p> <p>However we would like the consultation to include separate new sections for walking, cycling and public transport.</p>	<p>Points 1 & 2 & 5: Remove 'where possible'</p> <p>Point 4: Add 'using sustainable forms of transport'</p>	
p265	ST2	<p>Strongly Support: we support the council in safeguarding potential sustainable transport routes</p>		
p268 3	ST3	<p>Agree</p>	<p>Point 4: Add can be shown that these have been provided for as the priority</p> <p>Point 7: Add to the benefit of</p>	



p268-269	ST4	Strongly Support: maintaining the rail freight yard may provide options in future to reduce the volume of delivery vehicles travelling into and through Bath		
p270 1	2.333		Not just 'historic streets & spaces', should be whole of World Heritage Site	
p270 3	ST5 - 1	Agree	Point 1: Add not just the centre of Bath shopping streets - add all neighborhood hubs Point 3: Add that linked, continuous and safe routes 'are' provided as a priority Point 5: As long as this does not mean providing for motor vehicles over pedestrians and cyclist	
p271 1	ST6	Although would prefer it if people didn't drive to Bath and instead use public transport we recognise that this is difficult to stop. In this circumstance, if there is no alternative, we support the council in expanding Park & Ride facilities as it will alleviate congestion and pollution in the centre of town.	Points 1, 2 and 3 appear too prescriptive in favour of the Green Belt. We feel that it would be better if impact on the Green Belt was weighed up against the benefits of reduced pollution and congestion in the centre of town. We also feel that the council should look to avoid large expanses of black tarmac and look to less visibly obtrusive surface treatments. On existing sites, if not too visibly intrusive (e.g. Lansdown, Odd Down) we feel the council should look to install solar panel 'roofing' on Park & Ride car parks.	



p272-272 1	ST7	Strongly agree	<p>Point 1: Add with the priority of walking and cycling following desire lines</p> <p>Point 2: Add 'using sustainable forms of transport'</p> <p>Point 6: This needs to be qualified to discourage vehicle use</p> <p>Point 8: That provision for walking and cycling takes priority</p> <p>Point 9: As long as walking and cycling and PT are the priority</p> <p>Point 11: Providing car parking should be discouraged as this will encourage car use</p>	
p274	2.344 Parking Standards	<p>Object: why is there no opportunity to comment on parking standards? As per our previous comments we feel the council should use parking standards to reduce traffic and more particularly traffic pollution, by discouraging diesels and promoting electric cars, plugin hybrids and car clubs. The council should also plan for the needs of autonomous vehicles, with similar footprints to car clubs which over the next 2 decades will lead to disruptive changes in the current models of car ownership.</p>	<p>Parking standards should look to minimise parking in the centre of town. Provide differential parking and permit prices to discourage diesels and encourage electric vehicles. A standard for new parking facilities to provide 1 in N parking slots with charging points and ensure electricity cables are close to all spaces, so infrastructure is ready when electric cars become prevalent and need charging.</p>	
P278	Sustainable Construction	<p>There seems to be no section covering 'new developments' e.g. 'Energy Efficiency in New Dwellings', we know the council is restricted under recent Deregulation Bill legislation, but we feel a section on this would be useful.</p>	<p>Add a section on new domestic dwellings. Include a requirement to meet a summer 'overheating standard' e.g. optional SAP assessment – include it as</p>	



		For example we have concerns about overheating in new dwellings as is happening at Crest Nicholson's Riverside development, as a result of no solar shading.	a question in the 'sustainability checklist planning application' if it isn't already?	
p281 1	SCR1	Strongly support: we strongly support this measure and hope in future, potentially with a change of government, that planning regulations require home owners upgrade the efficiency of their existing homes as part of getting permission to extend their homes. We support Option 1.		
p281 2		Comment: 'draft' proofing is spelt wrong in the 'Emerging Policy Approach: SCR1' box, it should be 'draught'	Correct spelling of 'draft' to 'draught'	
p282	SCR2	Qualified support: while we support the general aims of this policy and would prefer 'Option 1'. We would like the council to impose higher standards on its own buildings, in particular its schools. Its recently built schools are no more energy efficient than Victorian Schools (2013 Verco Energy Survey of 72 B&NES Schools). Although the council's architects department claims to require insulation at minimum building regulations plus 25%, we think this policy is misguided as efficient management of ventilation and thermostatic control is far more important in buildings with high internal gains like schools.	Comment: include new standards for schools, ideally require a minimum number of energy rating points under BREEAM or minimum DEC ratings e.g. 'A'. 'Soft Landings' should be required of a period 2 years after delivery of new buildings, with contractual requirements for deliverers to meet the energy targets set during their planning applications. B&NES needs to lead by example on its own buildings. The policy should include substantial extensions to new buildings, so for example those more than 200m ² ? The word 'substantial' needs to be quantified? Lessons learnt from the 2013 Verco Energy Survey of 72 schools, some	



			recently built should be incorporated into new more detailed standards and guidance. This policy should also be reflected in the 'Building for Schools' section of the policy (p252)	
p283	SCR3	Strongly Support: we strongly support the council's policy of delivering Allowable Solutions locally if possible, and disagree with national policy which is likely to lead large developers to offset carbon emissions at unrealistically low levels. We would hope however that Allowable Solutions are not necessary and onsite solutions are delivered particularly with reduced solar PV costs.		
p283		Comment: the 'Emerging Policy Approach: SCR12' box is mislabelled, it should be SCR3, the auto comment box is also wrong when you click through on-line and where it is labelled ST2.	Fix wording and commenting of section references which appears to be wrong (typos?).	



p284 1	SCR4	Qualified Support: we strongly support the policy to reduce CO2 emissions in new developments by 20%. We feel that imposing standards above 20% might be difficult to justify given current national norms, but would like the council to continue to review the situation if there is a national trend to greater reductions. However, we are concerned about the use of Allowable Solutions as an alternative, because it is likely these won't be delivered locally and are likely to be an unrealistically/artificially low carbon prices. We would like the Allowable Solutions alternative removed from the policy, as we can't think of a good reason why these might be used as an alternative for example to off-site delivery of a solar PV farm elsewhere in B&NES if on-site delivery is not possible? We would also like to encourage when delivering solar PV to install roof integrated panels with their improved aesthetics.	Remove Allowable Solutions as an opt out, as all developers will try to use this. The only exceptions would be constrained or highly visible sites which might exclude the opportunity to install solar PV. Clarity around the term 'in the locality' would be helpful?	
p284 4	SCR4	Comment: 2.390 – we were unable to find the referenced Regen SW report in the evidence base list .		
p285	SCR5	Strongly Support: the aesthetics of solar PV are important and more clarity around this subject would be helpful, given the uncertainties created by B&NES's council's failed attempt to remove solar PV from Thyme Barn at Claverton.	Change the wording to include references to roof integrated panels and their better aesthetics.	
p287 1	SCR6	Strongly Support: we strongly support this policy and feel each site should be considered on its own merits.	We think a fixed 20% reduction is the best option, if you go for more they may be subject to legal challenges on the grounds of 'Viability', but the policy needs on-going review, higher levels might be achievable and financially more viable as solar PV panel prices continue to fall.	



p287 2		Comment: we weren't sure in 2.399 which 'table below' was being referred to?	Insert missing table or clarify reference	
p288 1	SCR7	Strongly Support: Transition Bath strongly believes in community led/owned/run renewable energy.	Comment: We don't really understand the semantic subtlety of Option 1: 'benefit' versus 'led' versus 'involvement'. It would be helpful if this were spelt out?	
p290	SCR8	Strongly Support: we strongly support measures i.ii and iii in increasing Bath's future resilience to water shortages, particularly with the long term effects of climate change increasing water stress.		
p291 1	SCR9	Qualified Support: we strongly support this measure, but feel it doesn't go far enough for non-domestic building development. We would like the council to provide a policy which includes showers and changing rooms for buildings over a certain size to enable people to run and cycle to work?	i,ii and iii of the Emerging Policy should be agreed and implemented	
p291 2	2.407 District Heating	Why can't we comment on this?		
p291 3	2.407 District Heating	We feel that for housing developments over certain densities e.g. 35 dph (net of open space) over 50 houses or blocks of flats, district heating subject to ground conditions, should be required to consider in detail whether district heating is feasible; currently developers just state they don't think it feasible on their planning applications without stating their reasons. We think there should be a separate 'Sustainable Construction List'/requirement for larger developments which include this and for example the 20% Merton Rule assessment. District heating has the major benefit that it would reduce some of the complexity of the	Include more stringent detailed assessment requirements for developers of suitable (high density) sites when they make planning applications. Specify over what size development this should happen – e.g. 50 or more individual homes, blocks of flats over 10 homes. Provide an alternative 'Sustainable Construction List/Questionnaire' for larger developments.	



		need for homes to stop burning fossil fuels (gas) in order to meet our 2050 carbon emission commitments, its downside is the potential energy transmission losses which need to be carefully thought through.		
p291 4	2.407 District Heating	We don't believe the following statement to be true "services company EON and owned by Crest Nicholson) and has scope for additional capacity to serve nearby sites, subject to negotiation." During a recent visit they stated the current Energy Centre was at capacity and they were looking at other solutions elsewhere on the development.	Remove the reference to EON/Crest, or clarify their stance.	
p300 1	PCS2 (Air Quality) or PCS3, but we think its mislabelled PCS3 = hazards and hazardous substances	<p>Object: the policy is weak and makes no attempt to reduce pollution to acceptable levels for good health, the policy seems to promote maintaining the status quo. We feel the council needs much stronger proposals, as we have indicated in our comments on policy ST1, which include differential parking charges and permits charges for diesel vehicles (high) and electric and plugin vehicles (low), required provision for electric car charging points for on-road parking in new developments and a more proactive policy to encourage car clubs.</p> <p>The problem is B&NES has had Air Quality Management in place for a number of years, yet in that time air pollution has not reduced and is still above EU requirements. We don't believe the policy as proposed is proactive enough to make any difference to the current situation or indeed lead to a reduction. If new homes are going to be built in Bath, this is surely going to increase emissions & congestion and make the situation worse?</p>	<p>Completely rewrite the section on air quality as existing policies have not delivered a reduction in pollution, and this new approach seems no better. We would like to see a more proactive approach to reduce pollution, including 'Low Emission Zones', encouragement of low emission vehicles and the discouragement and banning of high emission diesels.</p> <p>Correct PCS2/3 labelling of this section of the document as it's confusing. Policies to reduce traffic pollution should be reflected under 'Sustainable Transport' as well.</p>	



p306	PCS8	Strongly Support: if there is any uncertainty which suggest that hydraulic fracking might have any impact on Bath Hot Springs then such a development should not be allowed.	State very clearly that the 'precautionary risk principle' probably means no such development should take place in the rocks surrounding Bath even if there is the smallest risk of contamination. The springs have after all been used for over 2,000 years, and we feel a short-term need for energy should not put this at risk.	
p312-999	M5	Qualified support: on the understanding that the council is constrained by national policy we support these proposals. However, it is our view that national policy should be changed to ban hydraulic fracking, unless it is combined with Carbon Capture and Storage (CCS), and that appropriate environmental safeguards are in place and a precautionary risk principle is applied.	We would like the council to state that fracking should not take place unless it has no impact on the world's carbon emissions, and that this would only be achievable if CCS was used.	