



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to comment on the planning application [15/01932/EOUT](#). We are supportive of some aspects of the proposal but object to others.

Transition Bath **objects** to the following aspects of the application:

- **Excessive provision of 60 car parking spaces for ‘local needs shopping’:** We feel this is excessive and will end up being used by residents for general parking. We feel there should be no parking for the proposed shop, with the exception of perhaps 5 short-term spaces for drive-by shopping. The aim of local needs shopping is to provide access for locals on foot and by bike not by car, this proposal will only encourage more congestion and pollution and will most likely be misused. Better use of this space could then be made, for example communal gardens and secured bicycle parking?
- **Only 1 car club parking provision:** We feel that the provision of 1 car club parking space, with the provision of 1 more if demand requires is inadequate particularly as none of the 1 bed flats will have allocated parking.
- **Limited electric car charging:** Although we welcome the minimal provision we feel given future trends that there should be many more electric vehicle charging points than currently proposed. Ideally as a minimum electricity supplies should be provided to every parking space even if in the short term charging points are not installed?
- **Secure bicycle parking space:** 43 secure bike parking spaces is not enough. We feel there should be 2 per flat, so a total of 400. Too many of the proposed cycling spaces are in non-secure locations and will not be used by residents.
- **Type of green roof:** Despite welcoming the provision of green roofs we would prefer to see a more innovative approach for example a functional green roof space, with residents access for planting etc, as in this example:



Nash Partnership, the architects for this development recently attended a [presentation](#) organised by Transition Bath from Francesca Iliffe of Brighton & Hove Council which promoted the use of growing spaces on the top of similar developments. We would have hoped that some of this presentation might have informed Nash’s proposals for this development?



Transition Bath **commends** this application for the following:

- **Shared bike and pedestrian routes:** We are supportive of the proposed shared cycle and pedestrian route around the site and particularly on the river frontage, **but would like to see a more concrete proposal for access to and the re-opening of the disused railway bridge across the river immediately to the north east of the site**
- **Layout:** Given the constrained nature of the site we are supportive of the proposed layout and green spaces, with the exception as discussed above of the excessive allocation of parking spaces for shopping
- **Building energy efficiency measures:** We are also relatively happy with the proposed energy efficiency measures for the buildings on the site:
 - We would very supportive if CHP were installed, which would significantly reduce the effective carbon emissions of the site
 - We also feel that the developer's focus on minimising summer solar gain is good and hope as a result that residents don't complain of summer overheating as has happened on the adjacent Crest Nicolson Bath Western Riverside development
 - We would like to encourage the developers to install solar PV where feasible, but suspect that this is not a likely prospect given no provision is set out in their roof-scape plan unlike the green roofs? Could the developers discuss this suggestion and its feasibility with the council?
 - We would also like to see the developers deliver Mechanical Ventilation and Heat Recovery (MVHR) to all properties, rather than the mechanical ventilation to 8 flats being proposed to mitigate pollution at the front of the building
- **High housing density:** We support the high density of this development of 200 homes - more than that envisaged by the council's Placemaking Plan as it will alleviate the pressure to build on other sites in the city and also in the green belt

However we couldn't find any detail on the Section 106 or CIL obligations for the site, just a reference to it being a reserved matter; therefore it is difficult to comment other aspects of the development for example the offsite allotment contributions/provision.

Conclusion

Overall we have no strong objections to this development but we would like this planning application to be resubmitted to include:

- A much reduced parking provision for 'local needs shopping', making better more sustainable use of this freed up space
- More secure bicycle parking spaces, car club allocation and electric vehicle charging points
- A commitment to use CHP heating and power in the development to reduce its carbon emissions
- A more innovative approach to green roofscapes– with space for residents to grow plants and vegetables