



### **Summary**

Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to **object** to the planning application [14/04354/EOUT](#).

As a World Heritage site Bath justifies the highest quality, high performing buildings and environment fit for 21<sup>st</sup> living and working. This project developed by a social housing provider offers the opportunity to demonstrate the benefits of an exemplar development in building a sustainable community, energy efficient low running cost homes, an environment in which people are proud to live and a place which contributes to this extraordinary city. Unfortunately this application falls short.

Transition Bath **objects** to the application on the following grounds:

- Only 30% affordable homes, the minimum allowed and less than commercial developers at other ex-MOD sites; this is not something we had expected from a social housing provider
- Below minimum Building Standard levels of energy efficiency of the proposed homes
- No guarantee of jobs for locals during the construction phase something which was promised during the consultations
- No allotment provision

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

- The levels of community engagement during the pre-planning stage. Although it appears the communities top two priorities from a [survey](#) of residents – affordable and environmentally sustainable homes are not being delivered
- Their transport strategy: given the constraints of the surrounding road network and the lack of control local authorities and developers have over the bus network most of the transport proposals appear to be good
- The community hub: which will hopefully generate long term jobs and a sense of community

### **Conclusion**

A resubmission of this application is needed for it to achieve the high quality that Bath deserves with a commitment to provide:

- 35% to 40% affordable homes
- more energy efficient homes at energy efficiency levels of Code for Sustainable Homes level 5 with roof integrated solar PV available to all homes
- 0.48Ha of community allotments either on-site or immediately to the north east of Axbridge Road
- a written commitment to provide construction jobs and training for the community
- more concrete details on the sustainable voucher scheme and Car Club parking arrangements

This application in resubmitted form has the opportunity to demonstrate the benefits of an exemplar development, providing affordable and energy efficient homes in a sustainable community of which future residents and Bath could be proud.

### **Detailed comments below**

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## Affordable Homes

As a not-for-profit social housing provider there was an expectation at the outset of the project that Curo would provide a high percentage of social housing, 40% was often quoted during the consultation by the developers. This outline planning application is for only 30% affordable housing. It is also below the 35% being provided a commercial developer, Square Bay on another ex-MOD site at Warminster Road.

Given Curo is a not for profit organisation we would have hoped by forgoing the typical 12% to 20% profit on such a development that it would be able to provide a higher percentage of social housing. Additionally at the outset of the land purchase the affordable homes requirement from the council Concept Statement was 35% and not the current 30% of the Core Strategy, we would have therefore assumed Curo would have costed in 35% affordable homes before purchasing the land?

Reducing the number of affordable homes to be built puts more pressure on the development of vital green belt land in order that B&NES meets its Core Strategy commitments.

Affordable homes were the top priority for local residents in Curo's survey, this request from residents appears to have been being ignored?

**Conclusion:** we would like to see Curo re-submit their application with between 35% and 40% affordable homes.

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## Energy Efficiency of New Homes

We are disappointed Curo are only planning on offering Code for Sustainable Homes (CfSH) level 3 ENE 1:

- In their [survey of 700 residents](#) building homes to high environmental standards came second top priority; it appears Curo have ignored this preference from the community?
- B&NES council's Concept Document specified Code for Sustainable Homes level 5 housing, something which was known to the developers when valuing and purchasing the land
- As a social housing provider with many residents in fuel poverty we would have assumed that Curo would have prioritised energy efficient housing. The current application proposes homes which [cost twice](#) as much to run (£1,100) compared with the CfSH 5 homes (£550) and as low as £50/year if you include income from solar FITs and electricity exports. Building to higher standards would reduce fuel poverty, make this an exemplar development and make the market homes more saleable
- CfSH 3 ENE 1 is equivalent to Building Regulations 2010 Part L, and below current Building Regulations 2013 Part L. We presume there is no intention to build below minimum building standards?



- The standard being offered by Curo is significantly below that of the commercial developers of another ex-MOD site in Bath at Warminster Road (CfSH 4&5, MVHR, Biomass heating). We don't understand why a not-for-profit social housing provider like Curo can't provide high efficiency homes while a commercial developer can? Economically by forgoing its profit Curo should have at least £30million of addition funds which it could invest in more affordable and more energy efficient homes
- We would have preferred it if the application included the option for all owners and renters to specify roof integrated solar PV when purchasing the homes (in the same way Square Bay are offering at Warminster Road). Curo could profitably provide low costs green energy to occupiers on its rented properties using innovative financing at no additional cost to itself, we would encourage Curo to investigate this option further
- With a housing density of 48 dph, we would assume a district heating system would be viable but the developers claim it would not but without providing evidence
- We agree with the developers about the benefits of a fabric first approach but disagree with the majority of their arguments in favour of 'fabric first' and against solar PV which appear outdated. Unfortunately the British Building Industry delivers 'fabric first' homes which underperform predictions by between 30% and 65% compared with Solar PV which generally outperforms by 5% to 10% - negating many of the developers arguments in the planning application about their approach
- The Sustainability Statement mentions an aspiration of CfSH 4, but this is not substantiated, and in any case will be below standards required in Building Regulations 2016 Part L

**Conclusions:** we would like Curo to resubmit their planning application to include a

1. commitment to a CfSH 5 development as required by the council's Concept Statement
2. an offer to potential house purchasers the option of installing roof-integrated solar PV during the build stage and solar PV installed on all affordable homes
3. provide substantiation of why a district heating system is unfeasible (we don't think it is true)

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## Community Hub, Employment and Building a Sustainable Community

Although below the requirements of the council's Concept Statement for the site we are relatively happy with Curo's plans for the community hub. The commitment to sustainable long-term local employment is good but more detail is required. We are also supportive of Curo's commitment to provide a local single form entry primary school although we would like some commitment to a date when it is to be completed to avoid too many children from the new homes having to travel too far to school?

Our only concern is the lack of a commitment to provide local construction jobs. During the consultation Curo said this would be provided but we can't find a commitment in the planning submission.



**Conclusion:** we would like Curo to commit to a minimum number of construction jobs and training for local residents during the construction phase of this development.

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## Transport

Generally the transport submission seems reasonable within the limits of control Curo have over the surrounding transport infrastructure. We have a few comments:

- **Buses:** We support their commitment to reroute and rationalise the two current bus services. We are still concerned that the cost of the bus service (£4.40) compared with parking in the centre of town (£3.10) will not provide a sufficient incentive for residents to swap their cars for public transport. We understand that much of this is outside the developer's control.
- **Cycle and pedestrian friendly pathways:** we commend the application for the careful thought put into making the development friendly to the needs of cyclists and pedestrians – particularly the layout of the roads
- **Sustainable Travel Voucher Plan:** while we welcome this in theory given there are no figures quoted we wonder whether this offering is sufficient? An example is the offer to provide a contribution to Car Club Membership, given in Central Bath this is £60pa, we would assume the value of the voucher scheme is less than that and therefore unlikely to contribute to any significant modal shift in transport?
- **Road layouts:** we largely agree with the road layouts for access to the site, the development will increase traffic congestion on the Bradford Road, but there appears to be no feasible alternatives
- **Car Club and electric charging points for cars:** we commend Curo for committing to both parking for Car Clubs and the provision of electric charging points. However no quantifiable detail is provided in the application about the number of parking spaces allocated for car clubs and how many electric hook-ups there will be.
- **Assessment of secondary school transport requirements:** Unfortunately in their traffic analysis the developers appear to assume all secondary students are likely to be attending the local private school Prior Park College. No apparent mention is made of the need to transport pupils to local state secondary schools; Ralph Allen, Bath Community Academy, St Gregory's, Beechen Cliff and Hayesfield – and the impact this will have on traffic levels?

**Conclusion:** we would like Curo to resubmit their planning application to provide more concrete detail of the travel voucher scheme and more details on the allocation of parking spaces for Car Club cars?



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## Allotments and Open Spaces

B&NES council requires 0.48Ha of allotments to be set aside for a development of this size. There are no alternative allotments within a short distance of the site and the nearest allotments both have multi-year waiting lists. Unfortunately this application offers no allotment provision, just a contribution of £26,000 to B&NES council for an unidentified offsite location. We don't believe this contribution will result in any allotment provision particularly as the land value of 0.48Ha is about £1.25M - 50 times that being offered by Curo. Previous developer contributions in recent years to B&NES have not resulted in increased allotment provision.

The open space provision is also only 70% of that required by the council. We understand the constraints of the side but feel Curo should consider increasing the housing density from 48 dph to 55 dph to allow more open space?

During the consultations a site of over 0.48 Ha was identified at Axbridge Road but Curo appear to have decided against this. We do not understand neighbouring residents' objection to its location as it would have guaranteed that homes would not be built in their back gardens!

**Conclusion:** we would like Curo to resubmit the current application with a commitment to providing a 0.48Ha allotment near Axbridge Road or an alternative either onsite or nearby location of their choosing.