



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 [15/05688/FUL](#). We are supportive of some aspects of the proposal but object to others.

Transition Bath would like to make the following comments on the planning application:

- **Objection: To the use of mechanical ventilation (MV) and not mechanical ventilation with heat recovery (MVHR):** We feel the developer's plans are not very well thought out, they state *"The existing air quality around the site is poor, with limited opportunities to improve the situation. This may result in the need for some buildings to require mechanical ventilation. This will reduce the opportunities to provide low energy buildings"* We feel that they should install MVHR; typical MVHR systems not only have better filtering of pollutants, but they can assist in reducing energy loss within the buildings and make them more energy efficient. The apparent contradiction the developer raises between this solution to pollution and low energy buildings would not exist if they were prepared to install MVHR.
- **Comment: Overheating:** no attempt as far as we can see in the application has been made to reduce the risk of summer overheating in the buildings. Occupants of similar new buildings at Bath Western Riverside already complain about overheating in the summer. Given this development has perhaps 4 times the occupation density, and therefore greater internal gains we suspect they will overheat unless careful measures to improve the shading of windows are put in place. This is another reason why a carefully designed MVHR system, with intelligent summer bypass might be used to not only benefit the site with reduced heating requirements in the winter but could be used to reduce summer overheating without the need to open windows and introduce more pollution!
- **Objection: Viability:** The [Planning Statement](#) states the development would be 'unviable' according to the 'Viability Assessment' as residential accommodation. We consider that the developers, as with the Old Bath Press site are continuing mislead the planning department. We don't understand why some nearby developments e.g. Bath Western Riverside and Roseberry Place are viable with 30% and 40% affordable accommodation and others are not – it is very hard to believe and we feel the developers are submitting very biased overstated build costs and understated sales prices.
- **Support: The use of CHP:** We support the developer's plans to use CHP to generate heat and electricity efficiently. We feel they should also consider the feasibility of using the EON Midland Road Energy Centre district heating system which is within 300m from the site; the river shouldn't be seen as a barrier to the supply of hot water, as it could be run under one of the bridges, and wasn't for example a barrier at Battersea Power station when it fed the Pimlico Estate on the other side of the Thames.
- **Comment: Should this site be used for student accommodation?** The [B&NES Core Strategy](#) (p70, section 2f) clearly states that it is expected anticipated growth in student numbers will be largely met by on campus provision, this appears not to be the case for this application. However, the recent [Placemaking Plan](#) (p4, section 17) observes that *"demand for purpose built student housing is competing with the Council's priorities of delivering housing and employment."* but seeks (10, section 7a) to enable *"new off-campus student accommodation."* So the messages from B&NES are mixed as to what city centre sites should be used for. We would however like to comment that given the area is only 0.72 hectares (a very high 555 dph), and typical domestic city centre housing densities net of green space for flats in Bath are 120 dph (e.g. Roseberry Place), the city is probably only losing a 100 potential domestic dwellings, and therefore the use of this site for student accommodation is probably not a significant detriment to overall plans to delivery affordable housing in Bath.
- **Comment: Long term sustainability – re-purposing the building:** Although we are not necessarily immediately concerned with the use of this site for student accommodation, we wonder whether the current growth in student numbers will be maintained in future years, and whether in future, residential



student learning will be replaced by MOOCs? Given this uncertainty, it would have been helpful if the developers made some statement about future re-purposing of the buildings? Are the internal designs (large open spans) such that the buildings could be re-purposed for example into domestic apartments at the end of their life as student accommodation? From a sustainability perspective we would be unhappy if these buildings had to be demolished and rebuilt in 20 years' time?

- **Comment: Parking restrictions:** overall we are supportive of student accommodation with only limited support for parking – it will reduce pollution and congestion relative to alternative uses for this site. The location of the buildings on a busy junction are problematic for vehicular access and therefore whatever purpose this site is put to vehicle access will be a problem. By minimising on-site parking, access will be restricted. Many commentators have expressed concern about spill-over parking in surrounding streets, this could be managed by a specific contract with the occupants of the accommodation; the university already [specifically forbids undergraduate students owning cars in BA1 and BA2](#). We also wonder how the restricted parking might fit into a future re-purposing of the building? However, our feeling is that by the time this happens, the need for onsite parking for residential developments will be substantially reduced with the advent of autonomous vehicle ride-sharing?