



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to on the planning application [16/04818/EREG03](#).

Overall, we feel this planning application has many positive aspects from a sustainability perspective. However, there is too much ambiguity in the energy strategy for us to support this application. We are uncomfortable with, the use of 'to be considered', 'reviewed' during the construction stages suggests lower standards might actually be built? The word 'considered' for example is used 132 times on the sustainability appendix. This hybrid application, full planning permission for the offices but only outline for the dwellings is very confusing and makes it difficult to truly assess this planning application.

Our comments are as follows:

- **Support: Overall energy design:** We support the council in developing exemplar buildings, targeting a 17% reduction in CO2 emissions over Building Regulations Part L. We support the inclusion of solar PV and CHP in the development.
- **Comment: CHP or gas boiler?** The energy statement suggests that a CHP system will be installed for the residential dwellings, but that this will only provide 50% of the heating requirement – it is not clearly stated what will provide the remaining 50% of the heating requirement? We are assuming gas? Ideally, we would have preferred a better fabric standard and ventilation strategy which would have reduced heating demand enough that a gas boiler system providing the remaining half the heating demand would not be necessary?
- **Object: Fabric Insulation Standards seem ambiguous?** D&A Appendix A states a ~5% improvement in fabric insulation over BRegs Part L, but on p10 it then says *"Improvements upon the U-value performance standards required by the Building Regulations Part L at the time of construction would be implemented where determined to be beneficial and practically viable."* The ambiguity of this statement i.e. "we will decide at the time of construction what levels of insulation to install" seems incompatible with the headline ~5% fabric improvement? We would have also liked to have seen better window U values than the 1.6 W/m<sup>2</sup>K stated on p14 of D&A Appendix A
- **Comment: Double glazing:** we would like to see this development include triple glazing which often only costs 10% more than double glazing. Given the relatively low g values of 0.4 targeted we would have thought triple glazing would be a more natural fit? Additionally, triple glazing would provide significantly better noise insulation on a site next to the main A36
- **Comment: High thermal mass buildings:** while we support the design of buildings which 'transfer' natural solar gain from day to night and cooling from night to day, thermal mass in itself is not the answer to the problem. We would have preferred it if the developer had stated that the target 'decrement delay' of the fabric was 12 hours with a high 'decrement factor'. Increasing thermal mass doesn't necessarily lead to a good 'decrement delay'. It comes down to the choice of materials, particularly the type of insulation used, its mass and thermal transmittance – we would hope the architects and the developer understand this point as it is critical if this is what they are trying to achieve!
- **Object: Air permeability:** the target air permeability of the building is 3m<sup>3</sup>/h.m<sup>2</sup> at 50Pa – which is a high standard of permeability which we would support, however any air permeability below 5m<sup>3</sup>/h.m<sup>2</sup> should have an accompanying strategy for air quality. It is likely that at 3m<sup>3</sup>/h.m<sup>2</sup> the building in high occupancy areas will suffer from poor air quality unless mechanical ventilation is included. Unfortunately, on p11/12 it only states MVHR 'will be considered' – we feel it would be essential if the stated air permeability targets are met.
- **Comment: Inconsistency in stated solar PV plan:** The 'Sustainability Checklist (12)' states >500m<sup>2</sup> of solar PV, Appendix A of the D&A the Energy and Sustainability Strategy states 300m<sup>2</sup>. The Sustainability Checklist also states there will be no Solar PV (35g) which we presume is a mistake?



- **Object: 1 electric car charging point for 67 parking spaces:** from around 2022 it is predicted electric cars will become cheaper than ICE cars, and at that point 30% of new cars will be electric, provision of electric charging points for 1.6% of the parking spaces in this site is therefore unacceptably small and short-sighted
- **Object: Cycle Parking Provision:** although we support the provision of 110 cycle parking space, it is not clear from Appendix A of the D&A Statement whether these would be 'secure' parking spaces. This is part of the problem with this planning application, as mix of a full application for the office development but outline for the dwellings. The cycle provision for the dwellings must be secure – this is also a requirement of council standards – there is no mention of secure cycle parking in the planning application?
- **Comment: Provision of additional cycle routes:** it is not clear to us the relationship between this planning application and the council's aspirations for additional cycle routes included in Environmental Statement Figure 17.4? We do however support the additional cycle routes. However, we feel the proposal doesn't really address the issue of how cyclists travel safely from the bottom (north end) of Holloway into the centre of town. Even with the proposed new bridge which is part of the development, and additional cycle routes there is no safe way to cycle into town in this area. Either cyclists must dismount at the bottom of Holloway, and walk under the underpass, and across the footbridge next to the Churchill bridge, or they continue onto St Marks Road, and dismount to cross the A36, then walk across the bridge at the back of the railway station? This need to walk for 5 minutes with a bicycle in order to get into town is a barrier to cycling from the north side of Bath which isn't addressed by this planning application