



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to object to the revised planning application for [16/05219/EOUT](#). Generally, we are not in favour of the current proposals.

In addition to our previous comments, we would like to make some additional comments:

1. **Objection: Poor Energy Efficiency:** The energy standards on the buildings are too low, and do not meet B&NES's Placemaking Plan proposal of Building Regulations minus 10%.
2. **Objection: The developers continue to lie about the energy savings:** p68 of the 'Technical Evidence for Regeneration' states in 7.34 states energy bills will be reduced to around £320 – which we don't believe:
  - minimum regulated and unregulated electricity consumption for homes is about 3,000 kWh (Energy Saving Trust Powering the Nation Report)
  - typical minimum hot water consumption is 2,500 kWh of gas
  - typical minimum heating requirements of a well insulated modern flat is 5,000 kWh of gas
  - at 15p/kWh and 4p/kWh for electricity and gas respectively, this adds up to £750 per year which is more than twice the figure the developer has stated
  - we believe that the developer has failed to understand that SAP calculations do not include unregulated electricity consumption; cooking and appliances
  - their perhaps deliberate misunderstanding seeks to flatter the possible energy savings
  - although we recognise the new homes will be more energy efficient, we feel the developer needs to justify the improvements using the correct figures, not false ones which are at least a factor of 2 out
3. **Objection: Affordable Homes:** we feel the level of affordable homes is still too low, with a net loss of affordable homes on the redeveloped estate; however we are not party to the developers Viability Calculations so it is difficult to comment in detail

### Previous comments

Transition Bath previously made these comments on the original planning application:

- **Objection: Building the homes to absolute minimum allowable energy standards:** Building to minimum Building Regulations energy standards is unambitious and won't meet B&NES proposed Placemaking Plan standard where developments need to deliver 10% below Building Regulations minimum CO2 emissions. Why when Curo persists in attempting to argue one of the main reasons for this development taking place is that the new homes are more energy efficient, do they then apply to build homes to absolute minimum standards repeating the mistakes of the existing homes? Building homes to a higher standard is not costly, would reduce fuel poverty, and ensure that these newly build homes will not have to be retrofitted to a higher standard within 15 years of being built to meet the UK's Carbon Commitments.
- **Objection: Attempting to justify this planning application by making false claims:** The stated £342 annual average energy consumption of the new homes is unlikely to be true if it includes regulated energy.
- **Objection: Attempting to justify this planning application by making false claims :** On p2 of the Design and Access statement, it says Hanham Hall is a zero carbon development (CfSH 6) – this is untrue – it was planned to be zero carbon, but ultimately something of a much lower standard was delivered
- **Objection: Attempting to justify this planning application by making false claims** Table 4 in the Sustainability Statement suggests that the addition of solar panels will not reduce CO2 emissions or energy costs is false



- **Objection: Significantly reducing the number of affordable rented homes on the development:** The 30% affordable housing offering will result in a net loss of 218 affordable housing as it is replacing an estate with 60% affordable housing, and despite what Curo says it will involve a net loss of affordable rented accommodation across the combined Foxhill and Mulberry Park estate as 25% of the affordable housing will be shared purchase
- **Objection: Allotments:** the proposed development is of a much higher density than the existing homes resulting in much smaller gardens and therefore greater demand for allotments. The terminology of the planning application is too weak to be acceptable – it uses the term ‘up to 0.1 Ha’ – which could imply none, planning officers should not find this acceptable wording as it doesn’t meet B&NES requirements. ‘Grow Spaces’ are also not acceptable alternatives to allotments.