



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to comment on planning application 17/04338/FUL.

Comments

Following the developers revised energy strategy we would like to withdraw our objection in favour of these comments

- We now believe the revised application has the potential to be compliant with B&NES council's SCR1 Placemaking Plan carbon requirements, and that ASHP is a better lower carbon long-term solution than CHP
- We are concerned that the 'backup or parallel gas boilers' will be used not as a backup but a primary source of heat and hot water:
 - There is a risk that the proposed air source heat pump will not have the capacity to generate the required the heat and hot water required by the building; some mitigation of this could be provided if the capacity of the hot water cylinder (calorifier) was included in the planning application and as a condition, as the peak energy demand for this building is likely to be morning showers. We would expect a hot water storage capacity of at least 8,000 litres would be required to meet morning hot water demand
 - Economically the gas boiler might be cheaper to run than the heat pump; using the heat pumps to heat up the hot water cylinders overnight using low tariff electricity should mitigate this
- We remain concerned that the developer hasn't demonstrated in the planning application an air quality strategy for the building which would maintain good quality air all year-round?

Conclusion – planning condition

We would therefore like to see the following planning conditions imposed on this application so that it meets policy SCR1 post occupancy, which would need to be signed off before a completion certificate is issued:

1. The developer demonstrates there is sufficient hot water storage capacity delivered e.g. 8,000 litres to supply peak hot water (shower) demand in the morning, and that the heat pump has sufficient capacity to supply this hot water to the storage overnight
2. The developer demonstrates that the heat pumps are configured to act as the primary source of heat and hot water, and that this configuration is only available to service personnel
3. The developer provides an estimate of the percentage of heat and hot water which will be provided by the heat pump, and that this will deliver the 10% in carbon reduction required by SCR1