



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to comment planning application 17/05382/FUL

We are pleased the developers seem to be aware of the requirement since July that new developments with 10 homes or more need to be compliant with policy SCR1 which requires new developments to reduce their carbon emissions to 10% below that of minimum Building Regulations through renewable technology.

However, we have a few comments on the compliance of this planning application to policy SCR1:

1. We find the application in this area a little vague and difficult to understand. Although the application states a 4.5kWp solar PV array is sufficient to meet the requirements it doesn't state where this is to be installed.
2. The roof plan appears to suggest there might be some solar PV on the roofs of units 3,4,7,14 and 16, but it appears illustrative, and provides no commitment
3. The artists impressions don't include solar PV
4. The Design and Access Statement makes this comment:
"It is possible to provide the required area of pv panels on the roofs of the proposed dwellings"
We feel 'It is possible' is not a commitment and is too vague

We would have preferred that this application included solar PV on all the properties as they all appear to have suitable roofs; this is our understanding of the intent of policy SCR1. Solar PV, providing free green electricity would help alleviate fuel poverty in these affordable homes, and therefore we believe it is essential to install solar PV on all these homes.

Summary

Its is difficult to comment on the sustainability aspect of this applications as it provides no concrete commitment. **We would therefore like the developers to resubmit their application clarifying where the panels will be installed. If they are to be installed on only some of the homes, we would therefore like to object as this will only selectively help with fuel poverty.**

If permission is to be granted, could the planning officer apply the following **conditions**:

As built SAP calculations are submitted prior to completion, demonstrating:

1. *Carbon compliance with policy SCR1*
2. *Documentation of blower door tests at all properties demonstrating air permeability of below 4 m³/m²/hr @ 50 Pa – consistent with the statements made in the planning application, and required to meet 'as built' SAP calculations for policy SCR1*

We would hope Curo as a social housing provider recognise the benefits of solar PV in fuel poverty reduction and include solar PV on **all** these homes.