



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to comment planning application 17/05536/FUL

### **Policy SCR1**

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 would like to object on the basis CHP is not a renewable technology** and will not contribute to the centre's compliance with policy SCR1 which requires renewable technology to discharge the 10% lower carbon requirement.

The proposed property is also in an area of high air pollution caused by the adjacent highway, and CHP will only make this worse – in particular it would increase NOX and particulate emissions.

We would also like to comment on the ambiguity around the use of the CHP as the development also appears to include 'back-up high efficiency gas boilers', there is no statement as to how much of the modelled demand these will supply, so we are suspicious of the claimed 21% reduction without this information.

We would therefore like the developer to resubmit a policy compliant planning application which we can then re-comment on?

### **Heat pumps**

If a SCR1 policy compliant is resubmitted, and this were to include heat pumps, we would like to see the following in the submission:

1. A consideration of water source heat pumps given the location of the site backing onto the river (we would refer the developers to the commitment made by the developers of the Cleveland Pools to use water source -heat pumps in their permitted planning application which we supported). We would be very surprised if water source heat pumps were not a suitable solution at this location
2. That if a backup to heat pumps, using gas boilers is to be included that modelling is presented that demonstrates use of gas is minimised and that the heat pumps will provide the majority of the heat. In particular we would expect to see a large ~8,000 litre hot water cylinder/calorifier included to deal with peak morning shower demand – and that the size of this is clearly stated in the planning application

### **Cycle parking commitment**

We would like to **object to the secure 45 cycle parking provision as we feel it is insufficient for a 137 bed car-free development. We also feel there should be Sheffield Racks installed outside the building to allow visitors to cycle to the building.**