



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to object to planning application 18/00058/ERE03.

Summary

It's difficult to provide definitive comments on this application because of its Outline nature, much of the detail being deferred to the Reserved Matters stage.

Overall, we are supportive of the development from a buildings energy and CO2 emissions perspective but object to the transport component and particularly the excessive amount of car parking space.

Buildings Energy and CO2

- **Support: New Sustainable Construction Checklist:** We support the inclusion of the new Sustainable Construction Checklist in this application as it provides a clear summary of what is being proposed from a sustainable construction perspective:
 - This appears to be an exemplar development and planning submission from a sustainable construction viewpoint
 - In particular, the section describing the amount of overheating of the domestic development is very helpful, and the first we have seen for any development in B&NES. However, this was not completed for the commercial component of the development
 - We object to the lack of completion of the 'Future Proofing' section of the Checklist, particularly as the development uses CHP to mitigate its carbon emissions, and it's unclear to us how this can be adapted to meet our 2050 Carbon commitments. We feel it is important that large developments state how the building can be adapted post-construction to meet our zero carbon 2050 emissions target if including fossil fuel based energy systems?
- **Support: 19% CO2 reduction:** We support commitment to a 19% CO2 reduction over Building Regs Part L, including 10% renewables; although the submission is sometimes a little inconsistent, quoting 20% reduction in some places
- **Air permeability:** While we support the proposed minimum air tightness of 3 m³/m²/hr @ 50Pa – we feel that there should be an explicit commitment to MVHR, rather than the option of 'exploring this'. There is a risk that this level of air permeability will provide an unhealthy environment. We look forward and expect more detail to be provided at the Reserved Matters stage
- **Support rain water harvesting:** We support rainwater harvesting, particularly if used for non-potable appliances like toilets and washing machines – and the pipe runs within the building are split to support this, reducing the need for energy intensive treatment for full potable water

Transport – objection

Too many car parking spaces: Overall, we object to the transport strategy for this site, and in particular the provision of between 430 and 495 car parking spaces, we feel that this is excessive and will only worsen Bath's air pollution problems. Given many people walk to work in Bath, the site is very close to rail and bus stations, and major cycleways, we see no justification for this quantum of car parking spaces. And, as alluded to below, this also impacts on the delivery of affordable homes. We feel that the car parking provision in this development is incompatible with the council's requirements to reduce air pollution in Bath from cars below



EU and WHO limits. We also feel this is short sighted and an expensive commitment as we feel much of this space will start to become redundant with autonomous ride-sharing services within a 15 year timeframe

Object: No quantitative commitment to secure and visitor cycle parking: Although the application makes aspirational statements about cycle storage provision we can't find any commitment to numbers of cycling spaces, despite detailed information being made available for cars.

Partial support for electric car charging infrastructure: The development proposed 4 fast chargers, 15 passive chargers, plus 110 passive chargers for the reserved parking spaces. This is significantly more than any other development in B&NES, however, we feel that all parking spaces should now support electric charging, given the lack of a comprehensive charging infrastructure in other car parks in Bath.

Object to lack of car club parking spaces: we wouldn't find any reference for the provision of car club parking spaces which would have significantly reduced the need for basement parking. It might be that we have missed this, but given the lack of a separate transport statement the submission is difficult to read from a transport perspective as information on transport is spread out over multiple documents. We continue to request that the council develops a 'Sustainable Transport Checklist' for large developments which would make assessing transport provision in planning submissions more transparent.

Coaches: This location replaces the existing coach drop off location, and although not ideal, we feel if you are going to have a coach drop off location in the centre of town, this is not a bad location to have one as access from the A36 Churchill Roundabout is short and likely to cause less pollution than the alternatives being proposed. We therefore lament the loss of a coach drop-off point at this location.

We also felt the need to make a statement about the support for horse riding in the submission was unnecessary!

Affordable Homes

We regret that 40% affordable homes are not deliverable for this development on the grounds of (financial) viability. The primary reason stated is that this is caused by a *"deficit is due to the burden of 'abnormal' on and off-site costs, including the significant costs in relation to the requirement for provision of on-site basement"*. We would argue, as we do above that this development is not an exemplar development from a sustainable transport perspective, and if the basement car park were largely dispensed with then perhaps affordable housing would be viable?

There are 2 points which we disagree with the submission on:

1. In the viability statement 30% affordable homes is the target objective for this development; we think that because the development is in the city centre that the target should be 40%?
2. The planning statement states that the viability statement 'demonstrates' that the site is unviable for affordable housing. We feel that this wording is incorrect, it should say 'states', as there is no demonstration, or inclusion of numerical information in the viability statement to confirm whether or not the site is viable, merely a statement that it is unviable. It would have been helpful if more detailed numeric information was provided in the viability statement, in particular the proposed 'developer profit' – which we would assume was less than 20%?