



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to object to planning application 18/01307/FUL.

This planning application doesn't meet B&NES policy SCR1 as it makes no provision for onsite renewable energy production.

The Energy Statement attempts to argue for a fabric first approach, which we would support, but only in compliance addition to the provision of onsite renewables.

The report quotes from Zero Carbon Hub policy statements to justify a fabric first approach but fails to mention that the main reason for the Zero Carbon Hub's existence was the building industry's inability to meet existing regulations on an as-built basis ('The Performance Gap' – 40% under performance in terms of CO2 emissions). The energy report presents a series of dubious and fallacious arguments of the benefits of fabric energy efficiency over 'bolt-on renewables'.

We would therefore like the developer to resubmit their proposal with one which is compliant with policy SCR1, with the inclusion of solar PV or air source heat pumps on every property. And, that if permission is granted for this application, that policy SCR1 is conditioned, and that this conditioning includes a compliant as-built SAP submission.