



# MOD Concept Statement Response

- Transition Bath represents 1,000 volunteers in Bath whose aim is to make Bath more Sustainable
- We submitted a 15 page detailed response and would like to feel more of our points were integrated into the updated statement
- We feel the proposal for the 3 MOD Sites is lacking in ambition and could be more Sustainable
- In particular it is currently proposed that 80% of the properties will be built to Code for Sustainable Homes Level 4 (which will be the minimum required by Building Regs in 2013), we would like 80% Code 6 (Zero Carbon)!
- This decision appears to be on the basis of cost (the impact on MOD land values)
- We believe the Council's cost assumptions are incorrect as they are based on 2 year old Solar PV prices, using more up to date numbers would have limited or no impact on MOD land values

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- Bath has a great recent record on Sustainability based on community action with support from the council:
  - B&WCE – the largest UK share offer for community renewables company (born out of TB Energy Group)
  - Warmer Bath Document – an award winning report from BPT and CSE (with some help from TB)
  - Bath Homes Fit for the Future – open homes weekend from BANES, TB and BPT
  - This is community driven – the residents of Bath want to make it more Sustainable
  - The council is committed to significant carbon reductions by 2026, Code 4 will make meeting these objectives more difficult
  - The retrofit SPD
- Bordon, Hants MOD Site Disposal– All Code 6 plus Passivhaus
- Plymouth MOD Sites Disposal – the majority to Code 6
- Bath MOD Sites Disposal– 80% Code 4 (the minimum),20% Code 5/6
- Hence why TB feel the Bath proposal is unambitious, we want to feel proud of what is happening in Bath, and not be the poor relation to Bordon & Plymouth, and leave a beneficial legacy to future generations living in Bath

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- The reason for BANES's unambitious response appears to be the impact on MOD land values if houses are built to a higher standard
- So for example, if the houses are sold for £400K, cost £100K to build, the MOD land value is £300K
- But if you build to a higher CfSH 5/6 standard and you assume you can't market these properties and the build cost is £30K higher, the MOD land value is only £270K – a £30K loss per house
- We feel BANES's AECOM cost analysis is out of date for the renewables, which make up about 60% of the extra-over costs. Current Solar PV prices are between 4 and 6 times lower than they have assumed, reducing the cost of solar PV from £18K to £4K
- In addition we feel that with income from the FIT tariff, and the free energy provided, increases the value of the properties by £13,000 meaning there should be no significant impact on MOD land values
- Alternatively a community energy company (B&WCE) could provide free financing of the additional measures paid for by the FITs and from selling the Solar PV electricity

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- Additionally (some of numerous points we made in our 15 page response)
  - The Schools should be built to BREEAM standard Excellent
  - Ensleigh needs a community shop and café, to avoid car trips into town + the P&R and no. 2 buses need rationalising
  - Needs stronger guidance on site layouts
    - Location and integration of communal facilities
    - Location of car parking to ‘discourage’ use of cars, and encourage public transport



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- Conclusion
  - We would like support from the councillors to pursue further analysis of and guidance on more sustainable housing, with a strong recommendation for mainly Code 6 housing