



Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to object to planning application 17/06214/FUL

### **Energy and CO2 – non-compliance with policy SCR1**

Initially we would like to congratulate the developers on their clear Energy and Sustainability Statement.

However, **we would like to object to this application as it is not compliant with B&NES Placemaking Plan Policy SCR1**, which requires 10% of the CO2 emissions of the building to be offset by renewables, and that CHP is not defined as a renewable technology under this policy.

We are encouraged to see that heat recovery is being used in the ventilation strategy but would like to see a higher efficiency system than the current 67% proposal.

We would like the opportunity to re-comment on a resubmitted policy compliant Energy and Sustainability Statement. We suggest the developers refer to planning application 17/04338/FUL for guidance on how to become policy compliant. If ASHP is to be used as a solution we would like to see a clear statement that hot water cylinder/calorifier capacity is sufficient to meet demand using heat only provided by ASHP. We would also like to see solar PV included on the property, in a similar way to Lewis House.

Any approval for this application should be subject to a condition that the as-built property complies with agreed energy and CO2 emissions based on an acceptable re-submitted Energy and Sustainability Statement.

### **Transport: lack of cycling provision, lack of clear statement on overall impact of car journeys and pollution**

**We would also like to object to the limited provision of cycle rack – we feel 11 racks is insufficient for the number of staff.** Additionally, there appears to be no support for guest cycling – the installation of a NextBike-like loan cycle rack on-site would be welcomed.

Although the lack of on-site parking is welcomed it is unclear what impact on overall traffic in Bath this will have? The Transport and Travel documents talk at length about modest modal shift percentages, but we couldn't spot, through cursory reading of these documents what impact this development would have on the number of car journeys in and out of Bath, and therefore the impact on air pollution and congestion of this development? **We would therefore like to object to this application until a clear statement is made of the impact on car journeys in absolute terms that both staff and guests will have on Bath's already problematic air pollution and congestion problems will have? Our assumption is that guests and to a lesser extent staff largely travelling from the east of the UK will significantly worsen the pollution problems on the London Road.** We would assume this largely because the developers appear to have worked hard to avoid making a statement on the subject of car journeys in absolute terms?