Objection to planning application to build 244 homes on the old Bath Press Site 15/02162/EFUL

Transition Bath is a charity whose aim is to build a sustainable future for Bath. Transition Bath would like to object to the planning application 15/02162/EFUL on matters narrowly relating to 'sustainability'. Although some aspects of the proposal have merit we object to this application and ask the developer and the council to reconsider some aspects of this proposal.

Transition Bath **objects** to the following aspects of the application:

- **Provision of 12% affordable homes**: this is below the Core Strategy target of 30% for this area. A greater proportion of affordable housing would be desirable, as this low allocation would imply that more homes will have to be built elsewhere to sait demand and require the council to increase provision over and above the 13,000 homes defined in the Core Strategy
- **The assessment that Combined Heating and Power (CHP) is not feasible**: We feel the developer's assessment of the feasibility of CHP is flawed and may not be factually correct. We feel this development could deliver lower CO2, lower cost energy to residents, is financially viable and is an excellent site for such an installation. We request that this opportunity is assessed properly. We have provided more detailed arguments at the end of this letter of objection
- **No significant attempt to avoid overheating**: we feel there is a significant risk that a number of properties will overheat, something residents of Bath Western Riverside development on the other side of the road complain about. While some of the balconies will provide shading others will not and it is likely these homes will overheat in the summer. In the Sustainability Checklist Q20 in answer to the question '*Do you have adequate shading to avoid overheating in summer*?' the developers say '*No'*! We feel it is unacceptable that new homes are designed to overheat in summer and feel the developer should be asked to assess and design out overheating risk on all properties in this development
- **Only 2 car club parking provision**: We feel that the provision of 2 car club parking spaces will be inadequate particularly as none of the 1 bed flats will have allocated parking as part of their lease provision. We would prefer as with the Roseberry Place development, that if demand for more than 2 places is demonstrated once the development is occupied than additional optional car club parking spaces are made available?
- **No electric car charging**: No electric vehicle charging points have been allocated within this development, despite a year on year 44% growth in demand in the UK.
- **No installation of solar PV**: we feel there are some limited opportunities for the installation of solar PV on roofs in the development which the developers have dismissed because on Bath's World Heritage Site status. We would suggest there are excellent opportunities to install solar PV on the south facing mono-pitched roofs of homes on Dorset Close, and would contend that it is possible to install PV on roofs within the WH site as evidenced by the recent installation of PV on the council's Lewis House building in Manvers Street
- **Installation of cooling in office development**: cooling or air conditioning should be unnecessary in office development with careful design using passive design principles. We would prefer it if the developers designed these spaces more carefully to avoid the need to use energy intensive cooling?
- **Bat assessment**: we would have assumed this application would have included a 'Bat Assessment' but none has been provided despite the developers plans to install Bat Boxes?

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Transition Bath **commends** this application for the following:

- **The provision of secure bike storage**: we welcome the provision of 301/386 secure bicycle parking spaces
- **Use of MVHR**: We welcome the provision of Mechanical Ventilation and Heat Recovery (MVHR) as a way of improving their energy efficiency and mitigating the effects of air and noise pollution
- **High housing density**: We support the high density of this development of 244 homes - more than that envisaged by the council's Placemaking Plan as it will alleviate the pressure to build on other sites in the city and also in the green belt. However we would have liked to see slightly more provision of office accommodation and slightly less residential on this site to provide a better balance of housing and work space within this development. We don't consider there is adequate space for home work facilities in the 50 m^2 1 bed flats as the developer contends
- **Green roofs**: while supportive of the plan to install garden terraces and micro-allotments on rooftops towards the south of the development we would have liked to see similar provision to the north of the development where green/brown roofscapes are currently being proposed?
- **Air permeability**: we support proposed air permeability levels of 3 $m^3/m^2/hr$ for this development, which is at a level which is compatible with MVHR, and will reduce noise and air pollution
- **Access to electric bike hire scheme**: we are supportive of this 1 year offer to new residents, but there is some uncertainty as to whether these are electric or just normal human powered bicycles?

We also have the following **comments**:

- We are not convinced that thermal bridging Y values of 0.08 can be achieved if the proposed balconies are installed
- The Energy Assessment states that windows with U values of 1.4 $W/m^2/K$ will be installed, we don't believe this is possible for the Crittall windows which will be installed on some of the properties. The manufacturers, Crittall, state that the best their windows can achieve is 1.7 $W/m^2/K$. On this basis the Energy Assessment may be flawed and perhaps will not meet minimum building standards for energy efficiency?

Conclusion

Overall we strongly object to this proposal and request that the council reject this application and ask the developers to resubmit including

- More than 12% affordable homes
- Homes which won't overheat in the summer
- CHP heating, or as a minimum strong justification why it can't be installed and perhaps solar PV on some roofs, both of which would significantly reduce the CO2 emissions from the site and reduce residents energy bills
- Greater car club allocation and electric vehicle charging points

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More detailed comments on the developer's rejection of Combined Heat and Power (CHP)

We believe the developer should install CHP and that their current assessment is probably flawed. We believe by installing CHP it will significantly reduce the CO2 footprint of the development and reduce the cost of energy to resident, and unlike the developers feel that it is a financially viable option.

Some specific comments on the developer's justifications for not installing CHP:

1. **"The site is too small"**: we don't believe there are any significant lower limits to CHP installation on sites with shared heating facilities as proposed on this site. CHP is being proposed for the neighbouring application at Roseberry Place on the opposite side of the road – this development is smaller and the developers have not commented that it is not feasible
2. **"Too expensive for residents"**: "*The potential financial burden to the end users: as the heat market is currently unregulated, there is a risk that the effective heat tariff to residents could be higher than that of the conventional form of heat supply*" – we don't believe this to be true, E.ON which run the Energy Centre for Bath Western Riverside guarantee lower tariff than are available from energy companies to their customers
3. **"Not financially viable**": The government's official CHP assessment tool unlike the developer's assessment suggests that the site would be both technically and financially viable, providing a payback of the installation of CHP within 6 years:

Technically Feasible: **YES**
Cost Effective: **YES**

	Units	Option 1	Option 2	Option 3	Option 4	Option 5
Technology		Reciprocating Engine	Reciprocating Engine	Reciprocating Engine	Reciprocating Engine	Reciprocating Engine
CHP Capacity	kWe	125	75	150	50	100
Electricity Generated	MWh / yr	542	381	544	294	486
Useful heat Recovered	MWh / yr	870	661	827	455	731
CHP Fuel consumption	MWh / yr	1,753	1,315	1,694	982	1,620
Primary Energy Savings	MWh / yr	833	570	839	397	634
CHP Capital Costs	£	£151,000	£98,000	£176,000	£69,000	£125,000
Annual Cost Savings	£ / Yr	£26,000	£18,000	£27,000	£13,000	£19,000
NPV	£	£69,000	£53,000	£51,000	£45,000	£40,000
Payback Period	Yrs	5.8	5.5	6.6	5.2	6.5
CO_2 Saving against all fossil fuels	TCO_2 / Yr	245	175	247	133	201
	%	31 %	22 %	32 %	17 %	26 %
CO_2 Saving against all fuels including renewables and nuclear	TCO_2 / Yr	160	115	162	86	125
	%	24 %	17 %	24 %	13 %	18 %
CO_2 Saving against modern CCGT	TCO_2 / Yr	131	94	132	71	99
	%	20 %	15 %	21 %	11 %	15 %

4. **"Connection to the Bath Western Riverside Energy Centre not feasible":** the combined biomass/CHP Energy Centre for Bath Western Riverside is only 200m from the site on Midland Road and is closer to the Bath Press site than many of the existing homes it is already feeding. Although capacity constraints may be an issue (the developer's state that it isn't) we feel that it would be very feasible to extend the Energy Centre's district heating network to the Bath Press site along Midland Road at very low capital cost

We feel that the developers and their agents AECOM have not carried out this assessment correctly, and with due care and attention. We would like to see a more thorough assessment which we would expect to conclude should significantly reduce the site's CO2 emissions, deliver lower cost energy to residents and be very financially viable.