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# Bath and North East Somerset Placemaking Plan

## Participant Statement

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Matter 3: Responding to Climate Change

Prepared by Savills on behalf of Crest Nicholson  
Operations Ltd  
(Participant Reference Number 4708)

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## 1. Introduction

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This Statement has been prepared by Savills on behalf of Crest Nicholson Operations Ltd who have an interest in land known as Bath Western Riverside and part of the site falls within the Site Allocation policy SB8 of the Placemaking Plan.

Representations have been submitted promoting the site throughout the Placemaking Plan process, particularly to the consultations on both the Options Document in January 2015, and the Pre-Submission Draft in February 2016.

The contents of this Participant Statement supplement the representations previously submitted in 2015 and 2016, responding directly to the issues raised by the Inspector.

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## 2. Matter 3 – Responding to Climate Change

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**Issue 1– Whether the Sustainable Construction and Renewable Energy policies in the Placemaking Place are positively prepared, justified, effective and consistent with national policy, in the context of the adopted CS**

Q2. Is there conflict between the terms reduction in energy use and reduction in carbon emissions in relation to Policy SCR1 and the supporting text?

As stated in our previous submissions in respect to Policy SCR1, paragraphs 109 and 131, we agree it is important that the policy makes a clear distinction between reductions in energy use and reductions in carbon emissions to avoid any ambiguity, and that the policy should reflect changes to Government policy to ensure this does not duplicate requirements now covered through Building Regulations.

At Bath Western Riverside, Crest has already provided an energy centre in partnership with E.ON. The principle for its delivery was set out in the outline planning application (06/01733/EOUT) and evolved from the Bath Western Riverside SPD paragraph 1.6.33 which stated *“BWR is an opportunity to demonstrate the potential for using low and zero carbon technologies in an urban setting.”*

An energy centre was originally provided within one of the apartment blocks, then subsequently replaced by a standalone energy centre, which was granted Reserved Matters Approval on the 4 May 2012 (11/05440/RES). The energy centre is provided to meet 10% of the site’s energy requirements supplying low/zero carbon energy to all buildings and in accordance with the BWR Energy and Sustainability Strategy Addendum, 2010 which is noted in the outline planning application’s Section 106 agreement as the ‘First Energy Strategy’.

The energy centre meets the requirements for the Crest development east of Midland Road, and has the capability to service the entire Bath Western Riverside development, as defined in the outline planning application, i.e. including land to the west of Midland Road and falling within part of the area identified at Policy SB8. The Section 106 agreement (Schedule 1, Clause 4.1.2) states no development can take place on the land west of Midland Road until the Council approves a Second Energy Strategy). The remainder of the Western Riverside site, as per the outline planning permission, should be connected to the energy centre thereby making a significant contribution to lowering carbon emissions across the development site and to ensure compliance with Policy SCR1 and the objectives from the SPD and the outline planning permission.

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### **3. Conclusion**

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Policy SCR1 should make a clear distinction between reductions in energy use or carbon emissions and should avoid duplication of Building Regulations.

Minor Modifications to paragraphs 109 and 131 should be made as per our previous representations to amend the incorrect statements.