

“I wish to represent the concerns and fears of those living on the East Of Bath, whose properties suffered from flooding at Christmas 2013 as a result of water from the swollen river Avon ‘over topping’ AND flood water spreading via the water table BENEATH Kensington Meadows.”

Since 2010 National Legislation, in the form of the Flood and Water Management Act makes B&NES council – and B&NES councillors – responsible for managing Flood Risk from local sources and also to produce a local Flood Management Strategy.

Perhaps I can remind you of some elements within B&NES Flood Risk Strategy.

For example :- (i) Objective 4 seeks to prevent development that creates or increases Flood Risk.

And it notes (ii) Rivers contribute 82% to Flooding

(iii) B&NES population density is higher than the rest of the South West and England as a whole

(iv) The most densely occupied wards in our World Heritage City are Abbey, Westmoreland, Kingsmead and WALCOT with its many Listed Buildings.

(v) In the next 35 years the sea level will increase by 21.8 cms and winter rainfall will increase by 17%.

Your Bath River Avon Options Appraisal (B&NES & Environment Agency) FAQ responses published in August 2015 says “In carrying out sensitivity testing of the flow in the river Avon we are planning for a large flood with a 1% chance of happening in any given year to be 25% greater in scale in the future because of climate change “

All of this was known to you and your officers since March 2016.

In 4.14 today's Briefing document says “ The delivery of the Core Strategy will need to be supported by necessary infrastructure ... Transportation, Flood mitigation and Land Remediation are three key areas requiring specific mention” Thereafter, this document omits discussion of Flood Risk until

In para 8.2 your officer simply reminds you that “Site F was acquired to provide Compensatory Flood Capacity”

This confirms the fact that F is in the Flood Plain but fails to point out your own Flood Risk experts warning which I again quote from your Local Flood Risk Management Strategic Environmental Impact Assessment (Black & Veatch 122186) “Any significant engineering schemes will require a consent, appropriate Environmental Assessment and potentially a Statutory Environmental Impact Assessment BEFORE commencement.” And repeats in Appendix (p33) “ the use of certain hard engineering solutions or land disturbance in Flood Risk Management areas... may need Statutory Environmental Impact Assessment since one of the local Flood Risk Management Strategy objectives (4) is to prevent inappropriate development which creates or increases Flood Risk.”

Your officers have included ‘guestimates’ as to how much the sites may make or lose – but they have not considered the costs of Flood Damage to our World Heritage City.

Dr David Dunlop 25.01.17