

## **B&NES Cabinet meeting 13<sup>th</sup> July 2011 Guildhall Bath**

### **FLOOD MITIGATION (NOT PREVENTION) David Dunlop The Bath Society**

Government legislation in the form of PPS 25 and its Practice Guide, requires B&NES to address Flood Risk Management.

Core Policy 5 in the Core Strategy is based upon B&NES Strategic Flood Risk Assessment (Capita Symonds July 2009) and a later document by Atkins, B&NES Flood Risk Management Strategy Report dated June 2010 BUT NOT available until December, just before responses to the Draft Core Strategy were required !

At that time (January 2011), the multiple Appendices to Atkins were missing and despite repeated searches and requests, these Appendices (including Site Option maps) remained curiously unavailable until 7<sup>th</sup> July 2011!

In the light of Appendices C, J and L, it now seems that Atkins Strategy is to dig holes to compensate for the effects of riverside developments downstream.

These upstream holes would total about 350,000 cubic metres in size, located at Bathampton Water Meadows, much of which already floods, and Kensington Meadows – already in the flood plain (as are many of the properties along the south side of London Road).

The Kensington Meadows were tipped and raised in the 1960's with rubble and waste – including asbestos. Despite the Meadows elevation, gardens along London Road are still prone to water ingress because of ground water levels. Our Buildings Insurance premiums have increased threefold this year.

Atkins report suggests Flood Mitigation works at Bathampton should not be by digging an underground cavern (too expensive) but by lowering the height of the car park to allow it to flood thus putting 1400 cars and passengers at risk. Health and Safety conflict comes to mind.

Surely any proposal to proceed with Park and Ride at Bathampton is premature pending 1) the assessment of other alternative Park and Ride sites that were never seriously considered previously, and 2) pending the results of the Core Strategy Inspector's Inquiry in the autumn.

Core strategy Inspector Emerson's letter (3<sup>rd</sup> July 2011) raises significant concerns – For example he says “ *The Bath Compensatory Storage Study Phase 1 would appear of potential relevance but with no date for publication*” ! His questions in Annex 23 and 24 are relevant viz “*Is the delivery of the upstream flood compensation storage requirement achievable*” ?How will it be implemented ?how funded ? and “ *What is the contingency if it cannot be delivered or is delayed*”?

Given PPS 25 constraints, B&NES Councillors and planners must decide whether Bathampton Water Meadows can contribute to Bath's economy and protect the World Heritage Site from flood damage or just become a car park for folk who could travel more environmentally by bus, train or bike.