Bath and North East Somerset Council Planning, Transport and Environment Policy Development and Scrutiny Committee Tuesday 26th July 2011 2pm

David Dunlop The Bath Society

The Society respectfully reminds you oftwo new paragraphs in the Core Strategy submitted to the Inspector earlier this year.

1 Proposed change ref 12 (page 29) (Bath Strategic Issues):-

New 11: "In order TO ENABLE DEVELOPMENT IN THE CENTRAL AREA AND WESTERN

CORRIDOR SIGNIFICANT WORKS WILL BE NEEDED TO MITIGATE FLOOD RISK together with essential land remediation"

2 Proposed change ref 83 (page 112) (paragraph 6.28 and new paragraphs 6.28a &b):-

New 6.28a"The Flood Risk Management Strategy (June 2010) has identified and assessed a range of flood risk management options to enable development in vulnerable areas without increasing the flood risk elsewhere. THE STRATEGY HAS CONCLUDED THAT THERE IS NO STRATEGIC SOLUTION TO REDUCING PEAK FLOW THROUGH BATH WHICH IS EITHER TECHNICALLY OR ECONOMICALLY VIABLE. As such THE STRATEGY PROPOSES THE PROVISION OF COMPENSATORY STORAGE UPSTREAM COMBINED WITH ONSITE FLOOD DEFENCES. NEW DEVELOPMENT MUST PROVIDE STORAGE TO OFFSET THE VOLUME OF WATER THAT WOULD BE DISPLACED IN A FLOOD EVENT BY THE DEFENCES ON SITE".

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

The Atkins report (June 2010) advocates that Flood Mitigation works at Bathampton Meadows should involve lowering the height of the area proposed as a car park in the BTP,by 8.8 metres, to allow it to flood which would put 1400 cars and passengers at risk. We cannot see how such a combination squares with PPS25 Practice Guidelines. Comments in the appendices confirm our suspicions. Depending on water volume and flow rates the area could fill in less than half an hour.

GIVEN PPS25 CONSTRAINTS, B&NES MUST DECIDE WHETHER BATHAMPTON WATER MEADOWS SHOULD CONTRIBUTE TO BATH'S ECONOMY BY ENABLING DEVELOPMENT DOWNSTREAM IN THE CENTRAL AREA AND WESTERN CORRIDOR (AND ALSO PROTECT THE WORLD HERITAGE SITE) OR JUST BECOME A CAR PARK FOR FOLK WHO COULD TRAVEL MORE ENVIRONMENTALLY BY BUS, TRAIN OR BIKE. THE SITE CANNOT BE BOTH.