

1. Issue 2 Sub Matter: Bath Spatial Area

- 1.1 For Bath, the draft Core Strategy details the intention to focus new development within the city, including some areas which are at flood risk (Policy's BA2 and BA3). Justification for this has been provided by the Council in the Sequential and Exceptions Test report (CD6/D2-4, pages 9-13). In summary, we understand the Council's reasons include a lack of brownfield sites in Flood Zone 1 to meet the required level of development, the inappropriateness of an urban extension/Greenfield development, and the need to meet other objectives of the Core Strategy (e.g. regeneration, accessibility). As discussed in our representation (245\3 S) it needs to be ensured appropriate weight has been given to avoiding flood risk compared to these other considerations when undertaking the sequential test at the strategic level.
- 1.2 From the sequential and exception test work undertaken by the Council it is understood that it is not possible to deliver the 3500 housing target for the Central Area and Western Corridor without utilising sites which fall to some degree in Flood Zone 3 (CD6/D2-4, page 12).
- 1.3 PPS25 Annex D (CD2/20) is clear on the need to apply the Sequential Test at all stages of planning. This approach is also supported by the draft National Planning Policy Framework (paras 154 to 158). To comply with these requirements and given the different levels of flood risk across the Central Area/Western Corridor, it is therefore of key importance that a sequential approach is taken within the policy areas, as specified in the draft Core Strategy for the future Placemaking Plan (CD3/27, page 87, para 6.28b).
- 1.4 To adhere to PPS25 and the draft National Planning Policy Framework, where development sites within the Central Area/Western Corridor fall in Flood Zone 3, mitigation works will be required to make them safe. It has previously been identified that there is no strategic solution that would overcome the need for on site flood mitigation works (CD4/FR2, page 38). Such mitigation works could include ground raising, raised/new flood defences, and flood proofing measures. In delivering this mitigation, this will however reduce the overall storage volume of the River Avon floodplain, and potentially increase flood risk elsewhere, contrary to PPS25 requirements.
- 1.5 Flood compensation storage for this loss therefore needs to be provided either on site or off site. The Atkins Flood Risk Management Study identified the potential to deliver a strategic compensation area upstream (CD4/FR2). More detailed recent work by the Council has calculated an approximate volume of 205,000m³ required to compensate for the storage volume lost at development sites. The final figure for detailed design and construction of any compensation storage area(s) will need to be further informed by

hydraulic river model checks in future phases of work. The recently completed Phase 1 report by WYG (CD4/FR35) has identified three sites for further consideration by the Council. As discussed in part 6 of the report it is understood future phases will look to confirm issues in relation to technical feasibility and viability of the strategic compensation upstream storage area(s).

- 1.6 In terms of timescales the strategic flood compensation area(s) would need to be in place before the commencement of any development that relies on it for replacement storage. The Council Infrastructure Delivery Programme identifies delivery of the infrastructure early in the plan period (2011/12-2015/16) to allow sites that would benefit from it to come forward.
- 1.7 If adequate off site compensation, upstream or otherwise, can not be delivered, individual sites would be required to address their own compensation storage requirements on site. This constraint could threaten the viability of some sites coming forward for development, particularly for sites where the majority of the site falls within Flood Zone 3. The more of a site that falls within Flood Zone 3, the more problematic it is achieving the floodplain compensation storage required on site, whilst still achieving development that is safe from flood risk. This should therefore be considered when determining the scale of development that can be achieved if off site compensation can not be delivered.

Andrew Reading
Planning Liaison Officer – Environment Agency