

**Issue 2 Sub Matter: Bath Spatial Area, Flooding, Transport  
Respondent 257 (Valley Parishes Alliance)**

**Core Documents: Reference CD4/FR35**

**WYG Engineering  
Bath Compensatory Storage Study  
Phase 1 - Final Report  
November 2011**

The Valley Parishes Alliance has reviewed the above report and considers it to be important evidence which should be discussed at the Examination Hearings. However, we have two principal concerns regarding the content of the report.

1. On **page 1** (2 Data Gathering) the report states that the June 2010 Atkins FRMS report estimated that approximately 345,000m<sup>3</sup> of upstream compensatory storage volume would be required to compensate for the storage volume lost at proposed Bath development sites.

The report goes on to explain that, based on having obtained refined flood level predictions from the Environment Agency and a revision of potential development sites, B&NES now consider that approximately 205,000m<sup>3</sup> of flood storage volume will be required to compensate for the storage volume lost at the development sites.

This is a significant reduction (40.5%) from the Atkins estimate. Based on the information provided in the report; it is difficult to evaluate the robustness of this new estimate.

We, therefore, request that, prior to the Examination Hearings, B&NES publish more details regarding the flood level predictions and revision of the potential development sites, underpinning the reduced estimate of required compensatory storage.

2. On **page 2** (2 Data Gathering) the report states that the area considered for Mill Lane (*more correctly referred to as Bathampton Meadows*) Park and Ride site, which lies immediately to the south of the Batheaston compensatory storage site option, is not considered appropriate for use as an upstream compensatory storage area, in view of its intended use as a Park and Ride facility for Bath.

On **page 12** ((2) Batheaston) the report goes on to confirm that the area of the A4 Park & Ride (Bathampton Meadows) site was excluded from the capacity work.

These statements are a concern for the following reasons -

(a). the reference to the intended use of the Mill Lane (Bathampton Meadows) Park & Ride site is incorrect, because this option was deleted (some months before the WYG report was published) from the Council's transport proposals, and is in direct conflict with the Inspector's statement that its deletion from the Core Strategy is necessary to ensure its soundness.

(b). in view of its considerable area above the 1 in 2 year flood level, the exclusion of the Bathampton Meadows Park & Ride site, from capacity evaluations, greatly reduces the potential compensatory storage volume of the proposed Batheaston site which is owned by B&NES.

In light of these concerns we recommend that the WYG Engineering report be further revised (Revision 6) to reflect the fact that the Bathampton Meadows is *not* intended to be used as a Park and Ride facility for Bath (refer page 2 of the WYG report) and the Inspector's instructions to B&NES with regard to the Core Strategy.

We also recommend that WYG Engineering *include* the Bathampton Meadows Park & Ride site area in its capacity evaluations. The estimate of potential compensatory storage volume at the proposed Batheaston site should be re-evaluated and included in the revised (Revision 6) report. This would enable an assessment of whether the Batheaston site could, on its own, provide the necessary flood compensation storage.

We request that WYG Engineering complete and publish this work prior to the start of the Examination Hearings to allow a full understanding and discussion of this important matter.

**5<sup>th</sup> December 2011**