

ID/7 4.4 Proposed change PC20d refers to implementing an upstream flood storage facility to enable development in vulnerable areas in the Central Area and Western Corridor. PC83 is also relevant here.

- **Have the Council identified potential compensation sites and assessed technical feasibility and environmental impacts?**
- **How would such a scheme be delivered? What is the attitude of landowners? What is the likely timescale?**
- **TP8 (paragraph 17) suggests a cost of £35m. How will this be funded? If a substantial contribution is required from public funds is such a contribution realistic?***
- **Are there realistic prospects of the necessary works being delivered to enable planned developments to proceed?**
- **If upstream compensation cannot be delivered what type/scale of development could proceed in the river corridor?**
- **If the Council intend to rely at the hearings on the forthcoming report Bath Compensatory Storage Study Phase 1 (referred to in BNES/2 1.161.20) then this should be published by the date of the PHM so that other parties can comment on it in their further statements.**

1. The purpose of our representation **224/46** was to draw attention to the fact that the river corridor development envisaged by the Council would require upstream compensation to be in place at an early stage of the Plan's life, and its deliverability would need to be more certain than 'through the development management process'.
2. We therefore welcome the progress made on the issue of Flood compensatory storage in that sites have been identified in the Bath Compensatory Storage Study Phase 1. (**CD4/FR36**) However we believe that this analysis is unnecessarily limited because of the absence of consideration of sites within Wiltshire in addition to those within B&NES. Bath Preservation Trust is not qualified to comment on the effectiveness or otherwise of various flood compensation measures.
3. The changes we propose in **224/46** are still appropriate, in particular in relation to monitoring targets and timing. In addition we suggest that future feasibility work as recommended in the study should include the exploring regular river dredging as part of the maintenance of any upstream compensation.

Bath Preservation Trust/224
Additional Representation 3: Flood Risk
Issue 2
Flood risk (strategic sequential test)
Policy CP5, and related paras 6.25-6.32

4. We note the objection by the Inspector to para 1.9 of BNES/2 which asserts that residential capacity in Flood Zone 3 cannot be assessed at this stage, We share the Inspector's view that the plan should make assumptions about the location of various uses in these areas. Ideally no houses should be based in Flood Zone 3 and it is to be hoped that a consequence of upstream compensatory storage would alter the designation of these sites.

5. We note the Inspector's question in relation to contingency. We would suggest that those high density residential areas in the river corridor (ie the Western Riverside Development) have already met Environment Agency requirements for flood compensation on site. The plan only needs contingency in relation to the minimal extra housing potentially required in flood zones. It would therefore not be appropriate to look at contingency for these sites but rather, windfall housing should be factored in to the housing numbers at an earlier stage of the plan.