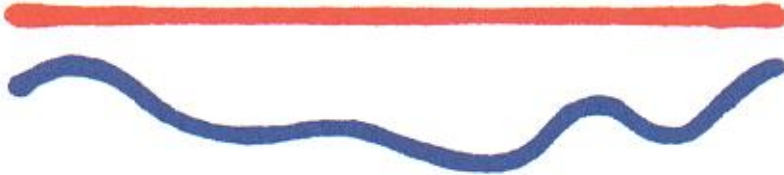


Issue 2 Flood Risk (strategic sequential test),
Bath Spatial Area, Bath Transport &
World Heritage Site
0227 (LoRARA) & 0266 (Bath Society)

LONDON ROAD AREA RESIDENTS ASSOCIATION



To Inspector Simon Emerson (B&NES Core Strategy)
via Chris Banks - Programme Officer

Acacia Lodge
Kensington Place
Bath BA1 6AP

Re:- Bath Compensatory Storage Study (WYG) November 2011 (CD4/FR35)

The timing of the publication of this document is strangely coincidental with the date of the Core Strategy Pre-Inquiry meeting.

1) It seeks to elaborate on the conclusions of the Atkins FRMS (June 2010) (CD4/ FR15–34). Despite five iterations, the BCCS Phase 1 Final Report remains superficial with typographical errors. It displays ignorance, draws no distinction between types of flood - run off and ground water, and has all the hall marks of a hastily prepared desk top study.

2) In contrast to Atkins FRMS which sought to combine a park and ride site with an excavated hole in the ground of 345,000 cubic metres at Bathampton Water Meadows (now confusingly referred to as Batheaston), WYG argue that the site of the previously proposed hole is sacrosanct as a car park and despite the fact that the proposal for the latter has been dropped from the Bath Transport Package. We previously argued that B&NES left hand did not know what the right hand was doing...now it seems the right hand is ignorant of the left hand's actions.

3) The required capacity for compensation works has now been significantly reduced, by 40%, from 345,000 cubic metres with no detailed explanation. WYG (page1 data gathering para 4) say that B&NES has undertaken a more detailed assessment and removed sites with extant planning permission. Is this wise and will it lessen the flood risk ? What is the Environment Agency view of this "removal" ? We ask that this alteration in volume be subject to rigorous examination at the Core Strategy Inquiry.

We know from Capita Symonds (CD4/FR1 & 6-10) and Atkins studies that no flood protection for Bath and its World Heritage Site can be guaranteed or afforded. The conclusions of those studies and Core Policy 5 was to minimize any INCREASE in flood risk occasioned by downstream development. In short, which areas of proposed or possible development downstream have been deleted during the course of 2011?

Will the Core Strategy positively exclude development on such sites ?

4) The WYG report advocates the lowering of Kensington Meadows up to the boundaries of Grade II listed buildings and Ringswell Gardens houses (nearby Grosvenor Place terrace is Grade 1), despite the 1940s and 1950s tipping of the Meadows. These properties already suffer from the effect upon water table levels when the river Avon is at peak level and flow rates.

Surely it is obvious that any mass of flood water must be coped with before it reaches Grosvenor and Kensington areas of conurbation ie UPSTREAM of ALL Bath's buildings not just upstream of developments in the city centre. After all, the World Heritage Site designation is accorded to the entire City of Bath not just the city centre.

The WYG report acknowledges the presence of installed infrastructure at Kensington Meadows, the details of which it could easily have been ascertained. It claims that there is easy access to the Meadows from London Road for the enabling works – not true. Presumably the writer looked at a map rather than the site.

The WYG report advocates tree clearance which will increase flood risk and riverbank instability. The riverside Nature Reserve and its flora and fauna would be destroyed if this suggested scheme were to go ahead.

The WYG report advocates 1 in 3 sloping of the Meadows with an average reduction in height by eight and a half feet. Thus it would be goodbye to the currently enjoyed sports and leisure facilities for football and other games and removing the reason for the past tipping and levelling.

The WYG report reveals complete ignorance of the Georgian archaeology of the site which includes the former Grosvenor Vauxhall Gardens – despite the fact that B&NES commissioned a study as recently as January 2010 “Kensington Meadows Local Nature Reserve in Bath” by Mike Chapman. This document can be sent to the Inspector if this would be helpful.

5) Batheaston and Bathampton meadows already flood. They are by name “water meadows”. The WYG report comes out against the latter because of mixed ownership – not a valid scientific or ecological reason for a local authority that recently sought CPOs on folks back gardens for the so called Rapid Transit of Bath's Transport Package !

6) Whichever site is chosen, we do not know at this stage whether digging holes of whatever size will be effective. Some peak flow rate calculations suggest that these holes, for example that of 345,000 cubic metres at Bathampton, could fill in less than an hour !

7) The problem of chronic or acute compensatory hole siltage has not been addressed and neither has the matter of cost of and responsibility for maintenance of these holes been resolved. Who will be responsible ? Will developers be bound to continuing responsibility and how can this be guaranteed if businesses fail ?

David Dunlop
Chairman LoRARA
Vice Chairman The Bath Society

29th November 2011