

The Hignett Family Trust have expressed their disappointment at the continued publication by the Council of possible ideas to address Upstream Flood Compensation during the various stages of the Hearing process. This is evidence that the Council have not determined a robust solution to this problem despite the publication of that Core Strategy over 12 months ago.

The SoCG ,to which HFT added its comments at the Hearing session, made clear that the process of considering upstream compensation was initiated by a clear understanding of the areas to be developed and the consequential flood storage losses that arose on those sites and along adjoining areas that would need to be protected. Without such evidence it is not possible to determine the volume of storage required, nor the levels in the flood cycle that such storage would need to be provided.

This information would then form the basis for flood modeling upstream.

Once again we find the Council proposing a site, with little thought or assessment of the environmental consequences of their proposals however more fundamentally , in the absence of any robust modeling evidence to support it.

The evidence in BNES 34 is crude and lacking any real technical assessment. It proposes major excavation next to a trunk road embankment, in flood plain without any geotechnical evidence to support the feasibility of the scheme. Knowledge of the underlying soils or geology is essential as is the nature of the groundwater and springs that are more than likely to emerge from a 10 metre cutting into the valley side. The design assumes stability of the electricity transmissions towers left on a 'steep mound' in this new excavation which may not be possible or legally achievable given the easements on such services.

The drawings by WYG are stated to be draft and we conclude that this sums up these proposals succinctly.

The proposal appears to clearly abandon all prospect of the Park

and Ride in this location, despite the city having no other location on the east of the City. Whether or not the Council removes any plan allocation in this Core Strategy for a park and ride here at Batheaston is neither significant nor should it be taken that it has abandoned its plans for such a facility here. As far as the facts are concerned, the Council has a valid planning consent for a Park and Ride in this location. In withdrawing its bid for transport funding in 2011, it did not rule out returning to this location as a Park and Ride in the future having considered all other solutions.

Having obtained planning consent, it no longer requires the allocation in a Core Strategy, infact it previously granted itself planning permission despite it not being in the Local Plan and therefore a departure.

This may not be a matter which the Inspector wishes to address at this stage however it simply adds to the confusion over whether it is sound to rule out the only location for a key piece of public transport infrastructure that might be needed during the period of the Plan, were the Council to determine there were no other practical alternatives. The necessity for such pieces of transport infrastructure are not simply to meet the desires of the motorist or the Council, but to address the key objectives that lie at the heart of the Core Strategy namely to reduce carbon emissions and to move towards more sustainable modes of transport. In addition, it is especially important to address congestion on roads leading into Bath, particularly the A4 London Road, which is the worst of all. The consequences of congestion are economic blight on the City but also deteriorating air quality, with the A4 demonstrating exceedence levels at all times of the year.

In conclusion, in the absence of alternatives that the Council have been unable to point to, we find that the exclusion of this site as a Park and Ride site is a matter of soundness of the Plan. Irrespective of what the Council say their transport strategy is today, this Plan must enure for 15 Years.

Although the allocation has been removed from within the Core Strategy Key Diagram in the Proposed Changes, the Council have reaffirmed their commitment to a Park and Ride on the east side of the City, see CD6/E2.1 ref 3 **“seeking to reduce nitrogen dioxide levels in Bath by, for example, reducing the level of heavy goods vehicle**

**(HGV) traffic in the city. through the introduction of a Freight Consolidation Centre for deliveries to central Bath and also by trialling a weight restriction to remove through HGV from London Road. Creation of one or more Park & Ride sites on the eastern side of the city to reduce commuter traffic”**

We therefore say as a matter of sound policy, this location cannot, even if it were technically suitable, be relied upon to provide flood storage compensation until alternative Park and Ride sites are shown to be deliverable.

Turning to the flood storage evidence:

We say:

- 1) The early flooding of the proposed compensation area has been considered and bunds at “A” and “B” are suggested as the solution to stop early flooding of the lowered area, these however only deal with the flooding from the river frontage direction;
- 2) The majority of the site is already in FZ3B so floods in the 20 year flood event. The 20yr level is approximately 21.8m, or about 40-45% of the height of the yellow strip of land shown as available for compensation;
- 3) The flows are out of bank upstream to the east in the 20yr event so will flow overland and fill this excavated yellow area early in a higher return period storm and offer no benefit beyond the 25-30 year flood event. Any bunds / earthworks created upstream to the east to control this early filling and the displaced volumes of flood water would need to be considered in addition to the development site compensation volumes;
- 4) In sections D-D and C-C the 20 year flood flow would fill all the excavated areas, in sections B-B & A-A the lower 40-45% of the yellow strip would fill;
- 5) The additional volume proposed in the blue excavation area is 106,800m<sup>3</sup> (168,300-61,500);
- 6) They need to excavate an additional 89,300m<sup>3</sup> of soil to achieve the 168,300m<sup>3</sup>, this is all above the blue compensation area;
- 7) Assuming they cannot dig below the current 2yr flood level they are 49,820m<sup>3</sup> short of the latest compensation figure in the SoCG;
- 8) The WYG plan has a note “proposed construction traffic route via Mil Lane” when there is no means of HGV access to the site along Mill lane.

To conclude, the site can only provide some of the flood storage capacity the extent of which would need to be determined by modeling. Lying in flood plain, it will be difficult to stop the whole site flooding in the 1 in 20 to 1 in 50 Year flood events without erecting bunds that impact on the existing flooding characteristics of the river valley and consequently cause problems elsewhere. This does not represent a robust solution.

The site is still the only location for a Park and Ride on the east side of the City which the Core Strategy continues to make reference to. As such its use for flood storage capacity is lost.