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Land to North of Rectory Farm, Yatton

Persimmon Severn Valley

Flood Risk Technical Note

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1 Introduction

- 1.1 This Technical Note has been prepared in response to the submitted Flood Risk Assessment (Ref:23257-HYD-XX-XX-RP-FR-0002, prepared by Hydrock Consultants Limited on 20th March 2023) and comments received from both the Environment Agency (EA) and North Somerset Council (NSC) in their roles as a statutory consultee to the submitted planning application (Ref 23/P/0664/OUT). This document was superseded by an updated Flood Risk Assessment (Ref 11069_FRA_Rv0, prepared by Brookbanks on 12th September 2023).
- 1.2 The EA (Ref: WX/2023/137123/01-L01, dated 10th May 2023) and NSC (Ref:23/0664/OUT, dated 15th May 2023) have provided separate consultation comments based on the submitted documents that have been prepared by Hydrock. Further to the received comments, a response was prepared by Brookbanks (Ref: Land to North of Rectory Farm, Yatton – Flood Risk- Consultation Response Rv2, dated 2nd August 2023). Following this response, discussions with the EA have been ongoing related to the points raised within the original letter.
- 1.3 It should be noted that no formal response from either the EA or NSC has been received to any documents other than the originally submitted Hydrock FRA. Despite this, discussions have been ongoing with key points and dates summarised below.
- a) 13th September 2023 – email sent from Brookbanks to EA to set out key points for discussion at a meeting to be held on 14th September with Richard Bull and Sam Archer. Key points for discussion included model version being used, flood levels and the approach in managing the risk – i.e. proposed finished floor levels.
 - b) 27th September 2023 – Summary email of the points discussed within the meeting on 14th September were circulated.
 - c) 9th October 2023 – Email sent from Brookbanks to EA. This email focussed on providing further justification/evidence to the EA on the tolerances of tidal models and particularly the Woodspring Bay model. This was based on readily available documents (both national and Woodspring Bay specific). Within this email, several questions were asked of the EA to confirm certain elements of what is considered acceptable, but this email provided evidence to state that a 150-300mm tolerance would be considered more reasonable for tidal model – which significantly exceeds the modelled 17mm experience.
 - d) 11th January 2024 – EA email to Rappor with confirmation that internal discussion (in response to email dated 9th October 2023) has been concluded and dates for a follow up meeting provided.
 - e) 16th January – Meeting (virtual) with Will Thomas and Sam Archer to discuss latest comments.
- 1.4 It should be noted that in November 2023, Rappor were appointed by Persimmons Homes Severn Valley to undertake a review of the previously undertaken work (by Hydrock and Brookbanks), continue discussions with the EA (most notably the meeting held on 16th



January 2024) and prepare a technical response with supporting evidence to address the consultee comments but also all discussions held since this date. The structure of this note is as follows:

- a) Summary of submitted Flood Risk Assessment (and Brookbanks' document)
- b) Summary of Initial Response to EA/NSC (by Brookbanks)
- c) Further Response to outstanding comments following discussions.



2 Summary of submitted Flood Risk Assessment

- 2.1 As stated above, two Flood Risk Assessment documents have been submitted in support of this application:
- a) Flood risk Assessment prepared by Hydrock Consultants (Ref:23257-HYD-XX-XX-RP-FR-0002, on 20th March 2023)
 - b) Flood Risk Assessment prepared by Brookbanks (11069_FRA_Rv0, on 12th September 2023)
- 2.2 Both documents were prepared to provide a detailed assessment of flood risk to the site. These assessments were undertaken in line with National Planning Policy Framework requirements and looked at fluvial, tidal, surface water, groundwater, and reservoir sources of flooding to the site. To assess the level of risk (and impacts of the development on said risk) several different sources of information have been used. These are consistent across both reports and are as follows:
- a) Fluvial Flood Risk – Flood Map for Planning
 - b) Tidal Flood Risk – Woodspring Bay 2020 tidal model. Focus has been on the 1 in 200 years plus climate change (2118 to be consistent with provided data) return period event for both the defended and undefended scenarios. This has been to meet required design events in line with policy and EA requirements.
 - c) Surface Water Flooding – The Hydrock report has been based on the available flooding mapping, but the Brookbanks report has utilised site-specific direct runoff modelling that has been undertaken for the site. This specific modelling was undertaken for both the present day and post-development scenario at the request of the LLFA in some of their comments.
 - d) Reservoirs and Groundwater Flooding – No site-specific assessments for either of these has been undertaken and readily available information (SFRA, mapping etc) was used to assess the risk from these sources.
- 2.3 It should be noted that both reports have used the Woodspring Bay model to assess the potential impacts of the proposed development on the surrounding area through including proposed ground levels within a 'Post Development' scenario. This, and the outputs from this, are discussed elsewhere in this note.
- 2.4 Both reports have provided the same conclusions for each assessed source of risk, and these are summarised as follows:
- a) Fluvial Flood Risk – The site is concluded as being at 'low' risk from fluvial flooding and outside all predicted flood extents from approved fluvial only models.
 - b) Tidal Flood Risk – This site is located within Flood Zone 3 and at 'high risk' from tidal flooding. A review of the Woodspring Bay model has shown that the existing coastal defences provided protection up to the 1 in 200year event. However, when making an allowance for climate change over the development's design life, the defences (as they are now) are exceeded and flooding at the site (and surrounding area occurs). The site also lies within the Undefended 1 in 200 year and 1 in 200year plus climate change flood extents.
 - c) Surface Water Flooding – Detailed site-specific modelling has confirmed that the majority of the site is at 'low' risk from this source. The only areas where an



increased risk is predicted is consistent with the existing ditch network within the site and localised areas of lower elevated land.

- d) Reservoirs – The site is located within the ‘Maximum Extent of Flooding’ associated with a reservoir failure. This would be in the event of a catastrophic failure of the Blagdon Lake, which is around 10km from the site. Given the monitoring and maintenance requirements for such reservoirs under the Reservoirs Act 1975 in England, which requires reservoir owners to regularly inspect and maintain the reservoirs, the risk of such an occurrence is very low and would be considered a ‘residual’ risk.
- e) Groundwater – It has been concluded that given the identified Historic Waterlogged Area in the northeast of the site and the identified clayey soils from Soilsclapes mapping, there is potential for high groundwater (subject to confirmation) and therefore potential for groundwater emergence in the waterlogged areas.

2.5 Within both reports and owing to the level of risk being identified with respect to tidal flooding, mitigation measures have been proposed. The principles are consistent across both reports and included recommended the raising of ground levels. The Hydrock report proposed raising ground levels above the 1 in 200 years plus climate change tidal flood level (7.88m AOD) with finished floor levels then being 600mm above this and at a level of 8.48m AOD. However, the later Brookbanks report (which followed discussions and meetings with the EA) proposed to use the defended flood levels rather than the more ‘worst case’ undefended levels within the Hydrock report.

2.6 This revised approach was also in line with another application within near proximity to the site which received no EA objection. On this basis and using the precedent set-in terms of flood risk management, it would propose to set finished floor levels above the 1 in 200 year plus climate change flood level from the defended scenario and a lower level of 6.28m AOD. Again, finished floor levels would be proposed to be 600mm above this and at a level of 6.68m AOD.



3 Summary of Initial Response to EA/NSC (by Brookbanks)

- 3.1 The EA (Ref: WX/2023/137123/01-L01, dated 10th May 2023) and NSC (Ref:23/0664/OUT, dated 15th May 2023) have provided separate consultation comments based on the submitted Flood Risk Assessment by Hydrock. Whilst it is understood that the updated Flood Risk Assessment and the Technical Note (prepared by Brookbanks on 12th September and 2nd August respectively) were submitted, no formal response has been received from either party at the time of writing this response.
- 3.2 There were parallels within the comments received by both parties and these are summarised as follows:
- a) EA Comment – Further investigations are needed as to the loss of floodplain storage because of the proposed ground raising. This would be for the defended scenario for a 1 in 200 year plus climate change tidal event.
 - b) EA Comment – Need for further discussion around fluvial risk to the site owing to modelling that supported a neighbouring application that was also prepared by Hydrock.
 - c) NSC Comment – Further justification as to the ‘dominant’ source of risk and also consideration for residual risks and ensuring the development is safe for its lifetime.
 - d) NSC Comment – confirmation of the scenario being mitigated for is required as defended/undefended scenarios require different measures.
 - e) NSC Comment – Any land raising should not be detrimental to other types of flood risk and the modelling should be used to demonstrate flood risk is not increased elsewhere.
 - f) NSC Comment – Confirmation as to the potential impact the proposed land raising has on surface water flow routes currently predicted.
 - g) Other comments have been provided (6no. in total) but these relate to the surface water drainage elements of the application, and these are being dealt with by Hydrock and therefore will be addressed via a separate response and do not form part of this note.
- 3.3 The technical note prepared by Brookbanks (Land to North of Rectory Farm, Yatton, dated 2nd August 2023) provided a response to each of the above comments. These responses are also reflected within the updated Flood Risk Assessment Document (dated 13th September 2023) that have been produced and submitted. As outlined above, no formal response to either of these documents have been provided but further discussions have taken place in the form of emails (those highlighted in Para 1.3) and a follow-up meeting on 16th January 2024.
- 3.4 As a summary, the responses provided by Brookbanks identified that the assessment undertaken by Hydrock was based on the Undefended scenario to adopt a conservative approach in assessing risk but more importantly, in terms of mitigating any resultant risks to the proposed development. This approach differs from that within neighbouring applications (most notably the Mead Development application at Ebdon) where the defended scenario has been used to determine mitigation and this has been accepted by the EA without the need to assess the impacts of the proposed development on 3rd party land – such as the comments raised formally by the EA and NSC. To ensure consistency with approved planning applications, Brookbanks undertook a further modelling



- assessment based on the defended scenario and ran this for both the baseline and proposed scenarios to determine the level of risk, and any impact on third party land.
- 3.5 The modelling exercise undertaken by Brookbanks (and detailed in the submitted technical note, dated 2nd August 2023) identifies that there is a significant reduction in flood volumes within the model domain when comparing the undefended (4.2million wet cells) and the defended scenario (1.3m million wet cells). In addition, the inclusion of the defences also significantly alters the timings of flooding at the site and surrounding area with flooding in the defended scenario being slower to impact the site than that of the undefended scenario.
 - 3.6 The Brookbanks note continues to state that whilst the impact to third party land was raised by the EA, it was confirmed in a telephone conversation, that this was not to look at provision of compensation storage and more to understand what, if any, impact the proposed ground raising had on the surrounding area. The provided note identifies that a review of the pre and post development scenario flood outlines has been undertaken and a localised increase in flood depths was shown. This was limited to the area immediately around the site and most notable around the northern and eastern site boundaries. The Brookbanks note identifies that these increases were in the order of 30mm-50mm. However, Rappor have reviewed the provided model outputs (those provided to the EA on 17th January 2024) and this confirms that the increase is up to 17mm when using the most recent proposed site levels and much reduced compared to the values quoted. This is discussed further within Section 4 of this document and following subsequent meetings with the EA about this issue.
 - 3.7 In relation to the EA's comments on fluvial flooding, Brookbanks have addressed this by stating that whilst a model was undertaken by Hydrock for the site to the immediate south of the Rectory Farm (North) site, these files are not publicly available as were prepared / provided to support a specific planning application and applicant. On this basis they are not available to Persimmon and are unable to be obtained and reviewed to understand their acceptability. Additionally, a review of the submitted flood risk assessment / modelling report for the neighbour site (and modelling referred to by the EA) has confirmed that this does not follow EA guidelines for fluvial modelling as is a combination of tidal and surface water modelling – see paras 2.19 – 2.21 of the Brookbanks documents.
 - 3.8 Brookbanks therefore concluded that this modelling was, if anything, overly conservative and a more appropriate approach would be to use the publicly available and approved Congresbury Yeo 2015 model to determine the fluvial risk to the site. This modelling confirmed that the site is outside all provided fluvial outlines.
 - 3.9 In response to the NSC comments the provided Brookbanks note acknowledges the NSC comments about mitigation measures being different between the defended and undefended scenarios and this is addressed further within the updated 'Brookbanks' FRA document.
 - 3.10 With respect to the comments referring to 'other types of flooding' it would be noted that risks from tidal and fluvial flooding would be considered as being within the EA's remit owing to the main river nature of the Congresbury Yeo. As such, and given the raised comments, it is considered that NSC are referring to surface water flooding as this fall is the responsibility of Lead Local Flood Authorities. The Brookbanks Technical note details how a surface water runoff modelling exercise was undertaken both to confirm the existing level of risk (which matched the EA's mapping) but also to understand what, if any, impact the proposed mitigation measures have on the pluvial flood risk. Brookbanks have undertaken a review and confirmed that the inclusion of the (worst case) mitigation measures (i.e. raising ground level above the undefended 1 in 200 years plus climate change tidal flood

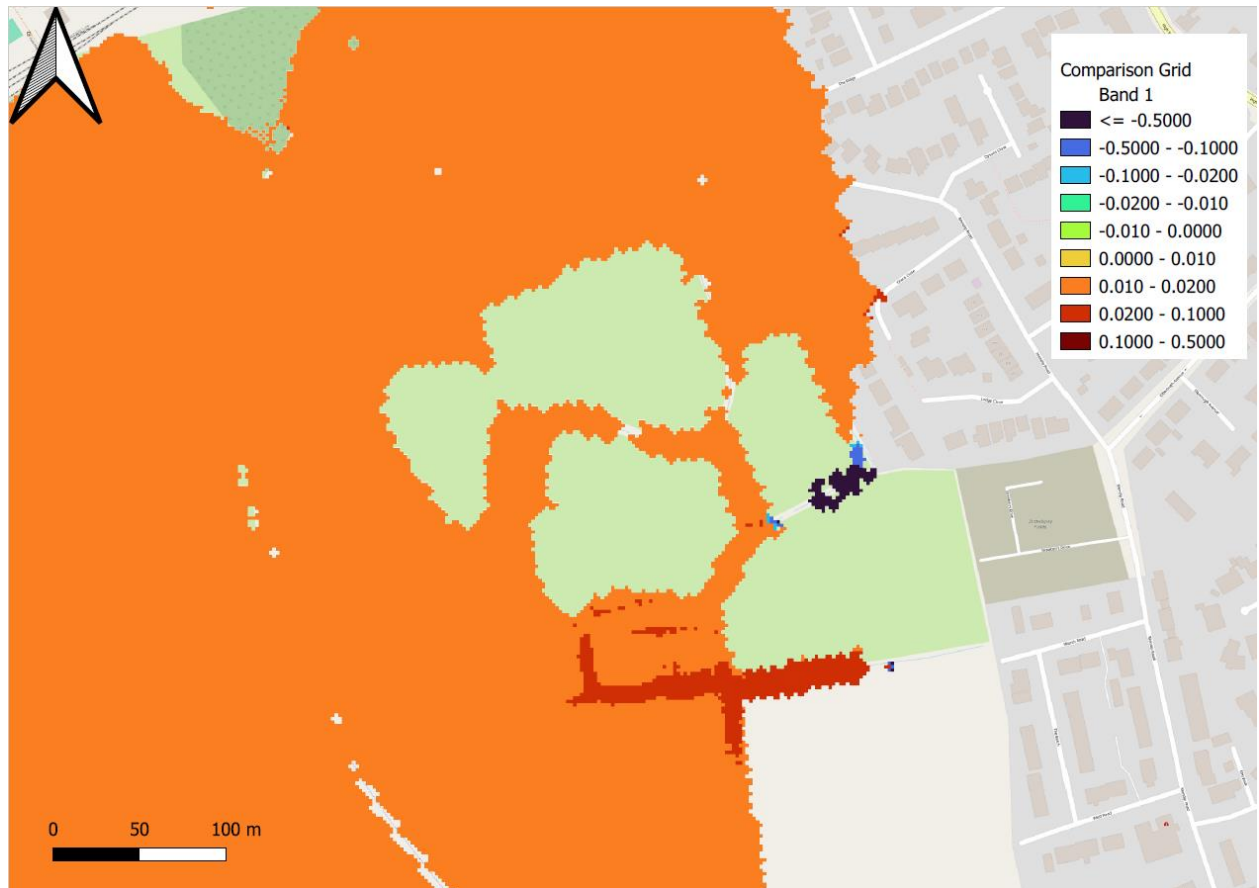


levels) results in no detrimental impact to third party land and, if anything, the proposals provide additional storage within the Rhyne/ditch network through the proposed ground raising and required embanking to meet the requirements of the Lower Severn Internal Drainage Board (LSIDB). Therefore, and for the conservative approach, the development has no impact on the surface water flooding regime.



4 Outstanding Comments - EA

- 4.1 As outlined within Section 3, a detailed technical note, further modelling works, and an updated FRA has been prepared to address the comments received from both the EA and NSC to the original application. However, and despite best efforts of the applicant, no formal response to these documents has been received. That said and owing to the outstanding points primarily being related to the tidal risk, discussions (as outlined in Para 1.3) with the EA have been ongoing.
- 4.2 The pluvial modelling confirmed no increase in risk as a result of the development, and that fluvial flooding is based on main river flooding in the absence of suitable modelling elsewhere, no further discussions have been held with NSC as it is understood that once the EA are accepting of the latest approaches/response that this would also meet the remaining outstanding NSC comments which relate to confirmation of the proposed mitigation measures. This position was confirmed with the EA (at the 16th January meeting) who would, on acceptance of the approach, liaise with NSC to confirm the outstanding tidal elements were now acceptable.
- 4.3 Following the meeting held with the EA on 16th January, the outstanding comments were discussed and confirmed. These comments have been further narrowed down since the formal consultation response and are now focussed around the following key areas:
- a) Modelling Tolerance – i.e. variations caused during the numerical calculations within the modelling process. This is widely accepted through model reviews and levels that fall within these tolerances are discounted as ‘modelling oscillations’ rather than a definitive impact.
 - b) Third Party Increase – linked to the ‘Model Tolerance’ point but a standalone point.
 - c) Mitigation Measures – proposed measures to ensure requirements are met.
- 4.4 On review of the modelling works undertaken, the proposed ground raising at the site results in all of the proposed development being above the modelled 1 in 200 year plus climate change tidal flood depths, but a comparison of the pre and post development grids has shown that flood depths within the immediately surrounding area do have a variance of a fairly consistent 17mm, see below figure.



- 4.5 The modelling shows flood level variances around the perimeter of the site that affects only a very localised area with no increases being predicted west of the Strawberry Line. On review of the increases, those to the north and south of the site are within farmland areas but those to the east of the site are shown to impact existing properties, and it is this that the EA have commented on.
- 4.6 In terms of the oscillations in hydraulic modelling studies, a tolerance is always provided owing to these being a computerised representation of reality and therefore a tolerance is provided for either discrepancies within the input data or because of the calculations the software runs during the simulation – referred to as oscillations within the calculation process. Whilst the EA nationally adopt a typical +/- 10mm tolerance (i.e. any variances within this limit being acceptable and considered as numerical oscillations) this is not detailed within any policy or guidance document. The model tolerance being policy/guidance was queried with the EA via email on 9th October with a request for this guidance/policy to be shared, but to date nothing has been received.
- 4.7 Whilst it is noted that there is a general ‘rule of thumb’ applied to model tolerances, it is considered, and widely accepted, that any agreed tolerance should be agreed on a model-by-model basis owing to the very individual nature of each study. Each model is very different in terms of complexity and data availability and as such is noted within the EA’s national model review documents, the ‘confidence’ of a model (and hydrology) is reviewed and specific to each model. A review of publicly available documents on model tolerances, and specifically tidal models, was undertaken and a summary provided within the email from Brookbanks to the EA on the 9th October which makes reference to tolerances and modelling uncertainties detailed within an EA Report titled ‘Coastal flood boundary conditions for the UK: updated 2018: Technical Summary Report (Ref: SC060064/TR6). Whilst this document is separate to the Woodspring Bay model, it should be noted that the



boundaries being discussed within the report are those that formed some of the input tidal levels within the provided modelling and used to generate the outputs for all events and all scenarios.

- 4.8 Within the document are extensive discussions around the confidence of modelling and specifically around tidal modelling and dataset at various regions around the UK. The report quotes a confidence of 95%. Whilst a specific tolerance value is not quoted, discussions with the wider modelling community have stated that for this model, and more generally for tidal models, this confidence would result in a tolerance 'in the region of 300mm' owing to the uncertainties and scaling of regional gauge data – i.e. gauged data may be several km from study site, and this would impact levels. This value is therefore well more than the 17mm increase shown in the modelling exercise undertaken to data.
- 4.9 This point was discussed with the EA and at the meeting on 16th January, the EA confirmed that a 150mm tolerance is 'more reasonable' for the Woodspring Bay model. This tolerance having been discussed and agreed with the Evidence and Review Team. Given the current modelling comparison shows a difference of 17mm this falls well within the 'more reasonable' tolerance and therefore should be considered acceptable and a result of modelling oscillations. However, the EA (at the meeting) continued to state that whilst the tolerance is considered as being more reasonable at 150mm, they would not accept this, nor the 17mm increase, as part of their planning consultation. The EA explained that due to a comparison of pre and post development having been undertaken any tolerance would be consistent between these and therefore the 150mm would not be applicable. In response, discussions were had around why, and how, the EA could therefore justify the more typical +/- 10mm tolerance and why model specific reviews (as is included in their standard model review documents) could not be applied. The EA said that in terms of planning they would be set at the 'standard' tolerance and would not be accepting of a 17mm difference despite confirming a 'more reasonable' tolerance for the Woodspring Bay model of 150mm and acceptance that numerical oscillations would occur, and more likely for large scale and tidal models.
- 4.10 Given the EA's position on the tolerance, and with a view of working to an acceptable position, the nature of the increases was confirmed and specifically around the potential change of risk and the consequence this 17mm difference would have on the third-party land.
- 4.11 On review, and as shown on Figure 1, the increases because of the development only impact a localised area around the site boundary impact <10 existing properties. From the available mapping it is unclear whether the buildings themselves are affected or if it is just the gardens. However, and to adopt a conservative approach, it is assumed that the 'properties' are affected.
- 4.12 Whilst there is an increase in the tidal flood level being predicted, it should be noted that the properties are already shown as being located within Flood Zone 3 on the Flood Map for Planning – though the site and surrounding area is shown to be defended against the 1 in 200 year present day tidal event.
- 4.13 As a result of the development, the extent of flooding (see below) does not increase and therefore no new properties are 'at risk'. Additionally, the properties where the 17mm fluctuations are predicted are at no 'change of risk' as remain as being Flood Zone 3. It should also be noted that the flood depths within the baseline assessment to these properties (and surrounding farmland) vary from 0.4m to 1.3m within the baseline assessment. These depths are for the defended 1 in 200 year plus climate change event



and on the basis that no upgrades to the defences are undertaken up until the year 2118 (i.e. the extent of the development design life used in the modelling). Whilst there are no formal plans available for North Somerset or the EA's proposals for upgrading the flood defences, owing to the number of properties shows as being at risk when making allowance for the impacts of climate change, it is considered reasonable that the defences would be upgraded to ensure a 'live' 200year standard of protection is maintained (i.e. upgrading works to keep pace with sea level rise through climate change). This approach, i.e. ongoing upgrading works, is outlined for neighbouring areas and set out within the Weston-Super-Mare Strategic Flood Risk Assessment.

- 4.14 With respect to the impact of climate change and potential for upgrading of flood defences, the Silverthorne Lane application is particularly relevant as within the Secretary of State's report it concluded that (para 455), that strategic flood defences would come forward given the 'clear and present danger of flooding to Bristol City Centre'. This therefore identifies that whilst (at the time of decision) no formal plans were 'in place' it is reasonable to assume that measures will be taken to manage the danger. It is therefore assumed that the same would be sensible for North Somerset.
- 4.15 This approach to the upgrading of the flood defences was discussed at the meeting with the EA on 16th January and it was agreed that despite formal plans not being available this was considered a 'logical' assumption. On this basis, and given the modelling is for the limit of the sea level rises through climate change it is considered that the increase in flood depth is not only based on a conservative approach (100year climate change on 200year tidal event with no upgrading works to the defences) but it is noted that the consequences of a worst case 17mm variance is considered as being 'low to negligible' on the basis of pre-development flood depth to these areas being circa 2m – therefore such a variance equates to a less than 1% increase – and no change in risk or increase in Flood Zone 3 extent.
- 4.16 Whilst it is agreed that third party increases in flood risk should be avoided where at all possible, it is considered that the nature of this assessment, and the more reasonable tolerances of the modelling would result in the 17mm increase being acceptable based on the arguments outlined above. However, it would also be important to highlight that as part of the works since the original EA response, a series of options for the site, and specifically the amount of ground raising, has been undertaken to, where possible minimise or remove the increases to third party land.
- 4.17 The key element reviewed for this relates to the amount of ground raising. Initially, the ground raised was set to a level above the undefended 1 in 200 year plus climate change tidal event. This was chosen to adopt a conservative approach whilst ensuring all proposals remained 'dry' during the extreme events. However, and noting the consultation comments from both the EA and NSC both stated that mitigation during the defended scenario would be considered acceptable (refer to the Mead Realisations application, ref 20/P/1579/OUT). When using the defended scenario, the flood levels, and therefore ground raising required are reduced by from a recommended level of 7.88m AOD (from Hydrock report based on the undefended scenario) to a much-reduced level of 6.28m AOD (para 4.57 of the Brookbanks report) when using the defended scenario.
- 4.18 The revised mitigation approach (i.e. using the defended scenario) has been discussed and agreed with the EA as appropriate. It is this reduced level (i.e. 6.28m AOD) that reduced the third party increase from the quotes 30mm in the Brookbanks report, to the latest value of 17mm (as per submitted modelling files).



- 4.19 The option to further reduce the ground levels was suggested by the EA with a view of reducing the off-site risk to be in accordance with the 'standard' model tolerance of 10mm and was considered. However, when reviewing this with the wider design team there were other constraints that meant a further lowering of ground levels was not possible. The key driver for this was in relation to ensuring the proposed surface water drainage could achieve a connection via gravity into the existing on-site ditches. This element of the scheme is being undertaken by Hydrock and they confirmed that any lowering would result in outfalls being too low to connect into the Rhynes and or avoid a 'permanently surcharged outfall'. This is not an acceptable, workable approach and the 6.28m AOD ground raising now being proposed is considered (by Hydrock) as the lowest acceptable level to meet LLFA and LSIDB requirements. In addition, there is a drop in levels from the neighbouring highway into the site and an element of raising is also required to ensure design standard for highways and access is also met. This is a further consideration that meant lowering ground levels beyond 6.28m AOD was not acceptable.
- 4.20 On this basis, and despite the best efforts, the revised ground level of 6.28m AOD is the lowest feasible levels that would not impact constraints from other disciplines. These constraints along with the fact that a conservative approach (i.e. looking at the full extent of climate change for the development design life with no increase in climate change) has been adopted and the resultant variance in flood risk to third party land has been confirmed as resulting in no change of risk, a negligible consequence as the events modelling as considered unlikely to 'actually' occur and therefore the variances are considered acceptable. This is also basing it on the standard tolerances for modelling and not of 150mm as agreed with the EA and documents within their report. This approach has been discussed with the EA and, as a conservative approach, they agreed that is presented a 'worst case'. It was also agreed with them that should suitable justification be provided within this document reflecting the matters discussed then their objection may be withdrawn.

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