LAND AT RECTORY FARM (NORTH) YATTON

Land at Rectory Farm, Yatton,
NSC Ref 23/P/0664/OUT
Planning Inspectorate reference APP/D0121/W/24/3343144.

KEY ISSUES ARISING FROM ERRORS IN THE BROOKBANKS FRA ID28

1. **Figures 4-6 and 4.7 of the FRA show Hazard Mapping which has been based on the original Land Raising of 8.44m as outlined in the Hydrock FRA CDA11. If the ground level was dropped to 6.88m AOD then this would have a significant impact on the speed of inundation to the site, as the site would be lower as well as the overall depth of flooding that would be experienced across the site. These hazard maps are therefore wrong and do not show accurately the impact of the site both for the defended and undefended scenarios.**

2. **There does not appear to be any details of how the ground level will be introduced and how therefore this will connect to the proposed site access. The modelling outputs shown in Figure 4.6 of the Brookbanks reports would indicate that the site access is also raised, right to the boundary of the site. This needs to be clarified.**

3. **In the Brookbanks Report the appellant changes the Design Storm from an Undefended to a Defended scenario which has not been agreed with the NSC. If Defended then a Breach Analysis should have been undertaken to address the impact of the failure of the defences.**

4. **The report also only presents results solely based on the Higher Central Climate Change Factors and the council's stance is that Upper Case should also be reviewed (Mr Bunns evidence para 2.8.4). The results therefore underestimate the future impact of the events.**

5. **Its not clear in the report when discussing the result of the comparison of before/after land raising and the 17mm increase, whether of not this has been based on a defended or undefended scenario. The council's stance is that it should be undefended with the Upper End climate change.**

6. **In the Rappor Technical Note dated May 24 ID28 (Which draws on information in the Brookbanks report states in para 2.5 that the potential for fluvial risk is something that has been discussed and agreed with the EA. The Rappor Flood Risk Technical Note Jan 2024 states that a detailed surface water runoff modelling exercise was undertaken to confirm the level of existing risk, but to also to understand what impact the land raising would have on the existing surface water flow paths and the general overall operation of the fluvial sand pluvial system in the area. This is a key issue for the LLFA and to date NSC have not been issued with the results and outputs of this modelling and it has not been demonstrated that this important issue has been addressed.**

Jonathan Cage
7TH Jan 2025