



## Land at Rectory Farm (North) Yatton

This document has been prepared in response to Technical Note provided by Create Consulting Engineers in relation to comments raised during appeal in relation to Appeal Ref: APP/D0121/W/24/3343144 in order to identify what works would be required to address each of the raised new points along with a timeframe to enable further discussions.

### *Point 1 – Access and Egress*

The information requested in point 1 has not been requested before.

The land raising is in fact to 6.43m AOD not 6.88m AOD as stated by Create's note. This has been modelled for the defended 200 year plus climate scenario (higher central), as agreed with the EA (in discussions to which the Council was invited but declined to participate in: see para. 2.9 of my rebuttal). The relevant information can be provided within 2 days within a Technical Note. The hazard maps are not wrong, but are if anything conservative, as this information will show.

Point 1 also requests this to be provided for the undefended scenario, which is another new request and contrary to the EA's agreement in the aforementioned discussions that the defended scenario was the appropriate scenario to model. **Timeframe:** If this additional modelling now sought by Create were to be provided, it would take 2 weeks (8 days to run the model plus interpretation time and packaging into a further Technical Note)

### *Point 2 – Modelling of Ground Levels*

This is a request for clarification around ground levels, not requested previously by NSC or through EA review of the files. Currently ground levels have been modelled at 6.43m AOD and prevents flooding, so inclusion of detail around access wouldn't impact the flood movement or depths.

**Timeframe:** Incorporated with modelling for point 1, so as above.

### *Point 3 – Design Storm*

The Defended scenario was agreed with the EA in the aforementioned discussions on the basis that when making an allowance for climate change, the existing assets are overtopped and therefore wouldn't drastically affect levels at the site and this stage. The point being that although the defences are overtopped, they are still in place and therefore included in the model albeit factoring in their overtopping.

The request for Breach Modelling is new and not something that the EA or NSC have sought previously (breach modelling was fleetingly referred to at Mr Bunn's para 2.6.9 but not requested nor was its absence suggested to be a basis for withholding planning permission, either in his proof, the Council's statement of case or the reasons for refusal). Should this be needed, the methodology would need to be agreed with LLFA and specifically in relation to the location (s), and width of the breach. Once agreed these would need to be modelled in detail.

**Timeframe:** 4 weeks.

### *Point 4 – Climate change*

This has already been dealt with at paras. 2.19-2.20 of my rebuttal.

### *Point 5 – Off-Site Increase based upon undefended scenario*

This is fundamental change in position from that agreed and discussed with the EA, and as understood from guidance documents available (i.e. HC is the design allowance). Also not raised within provided PoEs.



**Timeframe:** 3 weeks (assuming it is run in tandem with the work outlined above)

## *Point 6 – Fluvial / Pluvial Flood risk*

Information relating to the pluvial and fluvial risks (and others required in accordance with NPPF) were included within the original FRA that was submitted. Further conversations were undertaken (with EA in absence of NSC involvement) and it was agreed that fluvial flooding would be from the Congresbury Yeo and, based on available modelling, would not reach the site when making an allowance for climate change. Additionally, surface water flooding, whilst affecting the area to the east, has little impact on the development site. This position is referred to in correspondence with the EA.

This is a significant change of position. It should be noted that neither of these sources of flooding are referenced in the reasons for refusal or the Council's statement of case. These are also not points taken in Mr Bunn's proof of evidence.<sup>1</sup>

To respond to this new Point 6, it would be necessary to undertake two measures:

1. Request and Obtain the latest appropriate fluvial model for the area (assumed as Congresbury Yeo) and run this for latest climate change allowances (assumed as available from EA and fit for purpose). Outputs to be provided in form of a technical note for review.
2. Undertake a rainfall runoff modelling exercise (pluvial) to better understand the present day risks to the site from the surrounding catchment and also run a separate simulation which included the proposed development levels to enable a comparison of outputs (as was done for tidal flooding).

**Timeframe:** 2 weeks from receipt of data.

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<sup>1</sup> Further, the Hydrock surface water drainage proposals appended to my main proof of evidence have not been challenged and at the opening of the inquiry Mr Leader confirmed on behalf of NSC that the author of that document (Amy Hensler of Hydrock), who the Appellant was prepared to make available for questioning, did not need to attend the inquiry.

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