

Submissions to PINS 31.07.26

Tom Quigg – Flooding evidence

The model was prepared as proportionate planning-stage evidence, not for formal technical audit. In any event, it was commissioned by and belongs to the other appellants in the Clegg Appeals, and Flume does not have authority to distribute it in support of the Appeal for Plot 1.

Should the Inspector consider a detailed technical review of the modelling necessary, that would more appropriately be undertaken independently by a body such as the Environment Agency rather than through disclosure of the native model files. For these reasons, Flume is unable to provide the native model files to the Council or its representatives.

There are no separate hydrology or hydraulic modelling reports, or a project-specific user manual. The relevant methodology, assumptions and results are already set out in the submitted Flood Risk Assessment and Proof of Evidence. This is a surface water issue, not a fluvial flood-map challenge, and the modelling was prepared as proportionate engineering evidence to understand the local flow mechanisms and test effective mitigation.

The Council's requested confirmation that the model makes no changes to land levels or watercourses outside the Plot 1 boundary cannot be given. The model necessarily covers a wider area to represent the governing flow paths and contributing catchment. Plot 1 forms only a small part of the wider modelled area, and the tested scenario includes conveyance and landform interventions beyond its red line.

As explained at paragraphs 5.3-5.6 of Mr Quigg's Proof of Evidence:

While surface water behaviour is influenced by wider catchment conditions, this does not preclude plot-specific measures from managing local risk or avoiding adverse effects arising from a single site. The surface water modelling is relied upon to demonstrate that defined conveyance and storage measures are hydraulically viable in principle, not to assume that all appeal sites must proceed for mitigation to function.

The surface water model necessarily covers a wider area in order to represent the governing flow paths and contributing catchment. However, the acceptability of Pitch 1 does not depend on the delivery of mitigation on third-party land. The measures relied upon to demonstrate safety and no increase in flood risk comprise the raised platform and the managed conveyance and storage features within the appeal site, and the modelling demonstrates that these are sufficient in their own right. The wider model domain is a technical requirement of hydraulic modelling, not an indication that the appeal proposal depends on off-site works. Any wider benefits beyond the appeal boundary represent betterment and are not relied upon for policy compliance.

That remains the evidence of Mr Quigg. The modelling addresses Mr Smyth's assertion that effective mitigation could not be introduced and demonstrates that the identified surface water mechanisms are capable of being managed through engineering intervention. It was not intended to prescribe every element of the final detailed design.

Mr Quigg has reviewed the Council's further emails concerning the proposed levels within Plot 1.

The post-development modelling represents a generally raised development area across Plot 1, including the associated landscaped areas shown on the appeal layout. Those landscaped areas are therefore not modelled as lower openings through which floodwater would enter the area referred to by the Council as the “platform”.

The proposed levels place the occupied development above the modelled surface water levels. Water displaced by the raised development area is managed through the conveyance and below-ground storage represented in the post-development scenario, so that occupiers remain safe and flood risk is not increased elsewhere.

The final Plot 1 levels, storage and conveyance arrangement can be refined through detailed design and secured by condition.

This is consistent with the modelling methodology at pages 18-20 of the FRA, which explains that the model was prepared to test the mitigation principle and assess relative changes in surface water behaviour, rather than to fix final engineering or construction details at appeal stage.

Rhodri Crandon – Landscape evidence

Mr Crandon has been engaged in an appeal in Winchester this week and now on leave until the third week of August. The unreasonably short and imposed response timescales in the email from the Case Officer simply cannot be met. His initial response to the LPA’s request is as follows:

I’m aware, we don’t have any levels information for the site. My view is that the site will be largely level with a ditch to its frontage.

Giles Coe – Ecology evidence

In regards marking levels on the relevant drawings, this isn't something done as standard and indeed it would not be routinely expected for ecology plans to have levels on them in the way that's described by the LPA. The mapping platform QGIS can work in X, Y and Z coordinates but the project hasn't been set-up in that way. There is no deficiency in that approach, and there is no necessity for levels to be included on the relevant plans. However, it may be possible to add contour lines of existing levels.

Although it is not considered necessary, the appellant could adopt the same approach as the LPA, and overlay the flood map with the habitats plan.

However, it is not entirely relevant to the planting scheme whether it is subjected to a 1:100 yr flood event, only if such an event was very frequent. In that instance it is still likely that the same habitats would persist, but the species mix would adapt to those (grasses and woody vegetation) that deal well with inundation.