
Sent: 29 April 2026 14:33

Subject: FW: SMD/2026/0050 LLFA response

Further to the LLFA response to our application, please see our below response in red your comments. We have had direct consultation with our flood consultant on these and I hope the responses address any concerns you have. Please could the model and associated model log contained within the below sharefile link be uploaded the application documents?

If could reconsider your objection or let me know if you have any ongoing concerns that would be much appreciated.

Thank you

1. The hydraulic modelling shows that the floodplain extents, as modelled, are outside of the area to be infilled. However, it does not appear the referenced excel spreadsheet (17407-Model-Log.xlsx) with modelling assumptions has been included with the submission.

- Please find contained within the sharefile link the model and associated model log.

<https://waterco.sharefile.com/d-s9cf40beff05744389a1604c7051ba455>

In particular, the model appears to have used conservative estimates for pipe diameters which is generally a sound approach. However, we need to be assured that doing so at the upmost modelled culvert does not throttle floodwater generating less flow downstream than in reality.

- The upmost culvert modelled is Culvert_3 is located in the middle of the model extent. The surveyed diameter at the upstream extent of this culvert (450mm) has been modelled. Due to the size being 450mm at the inlet, this is the restricting factor on this culvert, so a conservative approach has not been taken here.

2. It does not appear the land use change (infilling) has been incorporated within the hydrology of the site so that it makes a physical difference within the hydraulic modelling. We need to be assured, via a suitable rainfall-runoff model or hydrological approach that the nature of the infilling - slope profile change, soil type change, vegetation change, etc. - does not increase runoff to the watercourse compared to the current scenario.

- The deposition area is ~7% of the total hydrological catchment area. As such the change in impact to the runoff is likely to be minimal.
- The soil type change is not likely to have an impact on the runoff to the watercourse. The BFIHOST19 of the catchment is 0.361 with slowly permeable wet very acid upland soils with a peaty surface and slowly permeable seasonally wet acid loamy and clayey soils. The material being deposited is clay, as such would have a minimal impact on the BFIHOST value for the catchment as it is similar to the soils found in the catchment.
- Following the deposition works it is proposed the land uses will return to existing e.g. grassland, rough grassland and track/road as such there would be no vegetation change post development works.

It should also be explained how the works will not increase erosion/sedimentation downstream that could lead to increased flood risk.

- The maximum velocity maps are included in the HMR and show there is only a very minor change in velocities as a result of the deposition. These changes are local to the deposition areas only.

3. Please note, as part of any Construction Environmental Management Plan, it will need to be demonstrated that the construction phase of works does not significantly impact surface water runoff/downstream flood risk and sediment problems/erosion risk downstream.

- The submitted Traffic Management Plan shows Vehicular Access Routes which are proposed as the only vehicle access during the construction period on the deposition areas which would be allowable during the deposition. The applicants would be undertaking the deposition themselves, and as such have had direct input into the identification of these access routes at this early stage. By minimising the vehicle access on site to only set paths, and within the site to existing tracks, it is considered that any sediment deposition/erosion is minimised to a reasonable level. Beyond this the deposition does not encroach upon the watercourse by less than 3 m, ensuring that non-vehicle deposition activity is kept away from the watercourse as much as possible, and where vehicles are required impact is minimised. By identifying these access routes on a submitted plan, they are considered enforceable ensuring that the LPA maintain reasonable control over this.



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