

27 November 2024

Attention: Andrew Thornton, Planning Advisor
Environment Agency

SLR Project No.: 405.064987.00003

Your Reference No.: AE/2023/128847/01-L01

**RE: Spring Grove Farm
Response to Environment Agency Objections**

1.0 Introduction

Further to our virtual meeting on Tuesday 24 September 2024 to go through the comments outlined your letter, dated 13 November 2023, we write to address your objection.

Please note that this letter should be read in conjunction with the Flood Risk Assessment (FRA) and Surface Water Drainage Strategy (SWDS) (SLR Ref: 404.11923.00004.0005 Version No.01 dated August 2023) prepared on behalf of Acorn Bioenergy Ltd. for the proposed Anaerobic Digestion Plant (the 'proposed development') at Spring Grove Farm, Withersfield Suffolk, CB19 7SW (the 'Site').

2.0 Modelling Principles

The model is a dynamically linked 1D-2D ESTRY-TUFLOW model (build 2020-10-AD-iSP-w64), extending approximately 250m upstream of the site and 350m downstream. A review of the model output confirmed that this extent captures the area of influence of the Site on flood risk. That is, any changes in flood risk (Figures 8-2 of the FRA) are contained well within the extent.

With all other model parameters deemed acceptable by yourself, we do not propose to undertake any change to the model for use in assessing the flood risk to and from the proposed development.

3.0 Climate Change

Your letter references a climate change allowance of 19% which we understand was referencing previous guidance. During our meeting, you confirmed that the allowance provided within Table 7-1 of the FRA are correct.

However, your letter also references a development lifetime of 75 years, typical for a non-residential development, rather than the 25 years specific to the proposed development. As such, over the lifetime of the proposed development of 25 years and with reference to Table 7-1 of the FRA, the climate change allowance of 8% adopted within the FRA remains correct.

4.0 Safe Access & Egress

During our meeting, you expressed concern over the provision of a safe access and egress between the proposed development and the A1307 to the south. In particular, we understand that you require the design of the access and egress route to be completed against the 0.1% AEP event inclusive of allowance for the impact of climate change.

Safe access and egress should be designed and assessed in line with paragraph 005 of the Planning Policy Guidance (PPG). The relevant text from paragraph 005 of PPG requires 'users to safely access and exit a building during a design flood and to evacuate before an extreme flood (0.1% annual probability of flooding with allowance for climate change'.

As such, the design flood, against which access and egress should be designed, is separate to the 0.1% AEP plus climate change which should be considered in the evacuation of the site. That is:

- The design flood should be taken as the 1% AEP plus climate change and used to set the finished level of the proposed access and egress route such that it remains dry during the design flood.
- The 0.1% AEP plus climate change flood level should inform the flood evacuation plan.

4.1 Access and Egress Route Design

We confirm that the FRA, and the design of the access and egress route, have been based on a design flood of 1% AEP plus climate change, taken as 8% as discussed at Section 3.0.

4.2 Flood Evacuation Plan

The Flood Evacuation Plan will be prepared and will recommend appropriate warning systems, advised by the flood mechanism of the 0.1% AEP flood event +8% allowance for climate change. However, we ask that the plan be conditioned as part of the planning permission as it does not affect the flood modelling or the design of the proposed development, included access and egress route, for the design flood.

5.0 Closure

We look forward to confirmation that the above information will be acceptable and as such you would be able to withdraw your objections to the planning application.

However, should you require any further information, please do not hesitate to contact us.

Your sincerely,

SLR Consulting Limited

Caroline Jeanne

Digitally signed by Caroline Jeanne
Reason: I am the author of this document

Caroline Jeanne
Associate Hydrologist

[Redacted signature block]

cc Kara Willgress, Environment Agency [Redacted]
Charlie Lywood, Acorn Bioenergy Ltd [Redacted]



Sophia Thorpe, Acorn Bioenergy Ltd [REDACTED]
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