[redacted]

From: Miles Orlopp [redacted]
Sent: Tuesday, November 21, 2023 1:44 PM
To: Andrew Rutter [redacted]
Subject: RE: 2023-10-17 MO Reply Spring Grove Farm, Withersfield REF SCC/0045/23SE

Hi Andy,

Sorry I thought I responded to this; I would suggest that the sequential test should be taken into account forgot to include that into the response.

Kind regards,

Miles Orlopp BSc (Hons)
Flood and Water Engineer
Growth, Highways and Infrastructure
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

[redacted]

The updated Suffolk SuDS Guidance (Appendix A to the Suffolk Flood Risk Management Strategy) is now available on our website at the following link:
https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk

From: Andrew Rutter
Sent: Thursday, November 16, 2023 3:13 PM
To: Miles Orlopp [redacted]
Subject: RE: 2023-10-17 MO Reply Spring Grove Farm, Withersfield REF SCC/0045/23SE

Hi Miles,

Thanks for this. Would you say a sequential test is also required?

Regards,
Andy

Andy Rutter AssocRTPI
Development Manager
Suffolk County Council
Growth, Highways & Infrastructure
(he/him)

From: Miles Orlopp [redacted]
Sent: Tuesday, October 17, 2023 11:45 AM
To: SCC Planning Mailbox <Planning@suffolk.gov.uk>
Cc: Andrew Rutter [redacted]
Subject: 2023-10-17 MO Reply Spring Grove Farm, Withersfield REF SCC/0045/23SE

Dear Andy,

Subject**: Construction and operation of an anaerobic digestion facility, associated infrastructure, and new access road, connecting pipeline and covered digestate lagoons – Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW**

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref **SCC/0045/23SE.**

The following submitted documents have been reviewed and the LLFA recommends a **holding objection** at this time:

- Flood Risk Assessment and Surface Water Drainage Strategy – 11923 – August 2023
- Flood Risk Assessment and Surface Water Drainage Strategy Appendix 4 – August 2023
- Flood Risk Assessment and Surface Water Drainage Strategy Appendix 5 – August 2023

A holding objection is necessary because alterations are required to the drainage strategy in order for the LLFA to further assess the application.

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the actions required to overcome our current objection:-

1. Submit a surface water drainage strategy that achieves the 4 pillars of SuDS and utilises above ground SuDS wherever possible for collection**,** conveyance, storage, and discharge, providing multi-functional and benefits. Features such as raingardens, tree pits and permeable paving are recommended. Please include an updated drainage layout which show the use of rain gardens and permeable paving within the development.
2. Detailed SuDS drawings will need to be included within the drainage strategy, i.e., cross, and long sectional drawings. All features should be designed in accordance with Suffolk SuDS Guidance. We also expect to see a contour plan, exceedance routes and impermeable area drawings included within the drainage strategy.
3. There is confusion within the calculations, please can you remove the calculations with the discharge rates and climate change which are not being used.
4. Additionally, please can the calculations be modelled as a network rather than source control which is currently being used.

As a minimum, we require the following documents and information to be submitted for each type of planning application or stage with the planning process.

Document to be submitted, **and brief description of details required:**	**Full**

Details of how the proposed Drainage Strategy will deliver on each of the four pillars of SuDS	✓
Flood Risk Assessment (FZ3 or Site >1Ha) Evaluation of fluvial, tidal, pluvial, reservoir & groundwater flood risk onsite – this will guide layout and location of open spaces. (SCC may require flood modelling if EA Flood Maps are not available)	✓
Contour Plan Assessment of topography/existing flow paths/blue corridors	✓
Drainage Strategy / Statement Document that explains how the site is to be drained using SuDS principles. Shall include information on: • Existing drainage (including adjacent highway systems) • Impermeable Area (Pre and Post Development), if unknown use conservative estimate e.g., 60% and justify • Proposed SuDS, recommended land take of 12-15% of the site if the proposed impermeable area is unknown (see below) • Hydraulic Calculations (see below) • Treatment Design (i.e., interception, CIRIA pollution indices) • Adoption/Maintenance Details	✓
Impermeable Areas Plan Plan to illustrate new impervious surfaces and total areas	✓
Evidence of any agreements to discharge to a third-party system (i.e., Anglian Water or adjacent landowner) Written evidence of any permissions or permits being obtained	✓
Detailed Development Layout and SuDS Provision Plan Dimensioned plans showing the detailed layout including SuDS, landscaping details, open spaces, and exceedance routes	✓
Full Site Investigation Report Detailed assessment of ground conditions • Widespread coverage of trial pits to BRE 365, proportionate to the scale of the development with a minimum of 2 for the smallest sites • Contamination/Pollution check • Groundwater Monitoring	✓
Detailed Drainage Scheme Plan Dimensioned plan showing main aspects of the drainage infrastructure. Plans should include: • SuDS details (size/volume) • Pipe Numbers/Sizes/Levels • Outfall & Permitted Discharge Rate (if applicable)	✓
Detailed SuDS Drawings (Open SuDS) Dimensioned plans of proposed SuDS components i.e., scaled cross sections/long sections	✓
Full hydraulic calculations (MicroDrainage "Network", Causeway Flow, or similar equivalent output) At this stage, SCC require simulations of the drainage network including SuDS components for 3.33% AEP and 1% AEP+CC storms. (Source Control files are useful but not enough on their own)	✓
Discharge Agreements Agreement to discharge to third party infrastructure if the scheme is reliant on it.	✓
Health and Safety Risk Assessment Where open SuDS (water level >0.3m) are proposed a CDM compliant designers risk assessment will be required.	✓
SuDS Maintenance & Management Plan Plans should include schedules which specify when and how maintenance should be undertaken	✓

The above table supersedes the equivalent contained within Suffolk Flood Risk Management Strategy Appendix A (May 2018) and will be included in a subsequent revision.

Kind regards,

Miles Orlopp BSc (Hons)
Flood and Water Engineer
Growth, Highways and Infrastructure
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

The updated Suffolk SuDS Guidance (Appendix A to the Suffolk Flood Risk Management Strategy) is now available on our website at the following link:
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