



Andrew Rutter
Suffolk County Council
Waste & Minerals Planning
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2023/128847/02-L01
Your ref: SCC/0045/23SE
Date: 20 February 2025

Dear Andrew

**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**

Thank you for your consultation dated 31 January 2023 for the above application. We have reviewed the documents as submitted and are maintaining our objection unless the points highlighted in our flood risk and land and water sections detailed below are addressed. We have provided additional information on how to overcome our objection below. We have also provided additional information on waste permitting below.

Flood Risk

We refer to 'Appendix E- Response to the Environment Agency redacted' referenced AE/2023/128847/01-L01 and dated November 2024 which has now been submitted in support of this application. The application is supported by an existing flood risk assessment (FRA), (referenced 404.11923.00004.0005 and dated August 2023), and the Hydraulic Modelling report (referenced FRA appendix 4) dated April 2023, as well as supporting information 'Appendix H - Updated Planning Statement Dec 24' (referred 404.11923.00002 and dated April 2023). We have reviewed the latest document and are maintaining our objection on flood risk grounds as it does not adequately address the issues raised previously, as duplicated below:

- The FRA fails to adequately identify the impacts of fluvial flood risk from the unnamed river designated ordinary watercourse. The impacts need to be supported by model information (see point 3)
- The FRA fails to adequately assess the impact of climate change using

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appropriate climate change allowances. In this instance, according to 'Flood risk assessments: climate change allowances', the allowance that should be assessed is the central allowance of 25%.

- Paragraph 006 in the PPG, indicates that the starting point for non-residential is 75 years. This corresponds to a climate change value of 25% for lifetimes between 2070 to 2125. The lifetime corresponds to epoch 2080, 'central' allowance, of the Combined Essex climate change table.

The applicants have maintained their stance on climate change at 8% (Appendix E), which is underpinned by their assessment of the lifetime of the development being 25 years (appendix H, page 23, point 4.5).

Following discussion with the LPA they have stated that the 25% allowance for climate change is the allowance to be used. The reason for their choosing is they have determined the development lifetime of over 75 years. If you disagree with this decision, you will need to speak to the LPA.

- the applicant has undertaken their own hydraulic modelling to challenge/change the existing flood risk to the site. We therefore need to review this model and its outputs before the flood risk assessment can be assessed in detail. Considering the LPAs stance on the lifetime of the development and therefore the peak flow climate change uplift value, hydraulic modelled is required to work to 25% allowance for Climate change.

Overcoming our Objection

The applicant can overcome our objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Land and Water

Our comments in our previous letter ref: AE/2023/128847/01-L01 dated: 13 November 2023 still apply

Waste Permitting

This development will require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency.

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Further information about permitting is available on our website at <https://www.gov.uk/topic/environmental-management/environmental-permits>

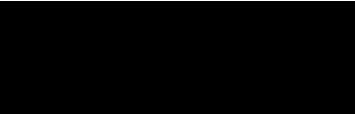
Until such time as a permit application has been formally submitted to the Environment Agency, we will not be assessing or reviewing documents such as the Odour Management Plan. The granting of planning permission is independent of a permit issue, and a permit application considers factors such as operator competence and operating techniques which have not been assessed here.

New waste developments in close proximity to residential, business or leisure receptors could result in the community at the proposed development being exposed to amenity impacts such as odour, noise, dust or pests. The severity of these impacts will depend on the size and nature of the facility and prevailing weather conditions. If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community will co-exist, and some residual impacts are likely to be experienced.

As the assessment of the risk of the proposed facility will be undertaken during the determination of the permit application, the applicant should refer to the following guidance in the interim, this details the appropriate measures we expect for facilities of this nature: Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

We trust this advice is useful

Yours sincerely



Mr Andrew Thornton
Planning Advisor



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