

**From:** Bennion, Matthew <[Matthew.Bennion@environment-agency.gov.uk](mailto:Matthew.Bennion@environment-agency.gov.uk)>  
**Sent:** 12 September 2023 08:39  
**To:** Rowles, Simon <[Simon.Rowles2@herefordshire.gov.uk](mailto:Simon.Rowles2@herefordshire.gov.uk)>; Justin Stevenson <[justin.stevenson@theruralplanningco.co.uk](mailto:justin.stevenson@theruralplanningco.co.uk)>  
**Subject:** RE: Proposed Solar Farm, the Hop Pocket 23/2448

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Dear Justin and Simon,

Thank you for your email Justin, and Simon for your take on this.

I agree with what Simon has said and would offer the following additional comments to clarify our response.

I refer to the Environment Agency guidance on climate change allowances for planning (WM area) attached, flood risk assessments for essential infrastructure developments should use the higher central 2080's climate change allowance (49% in this instance). Alternatively, the higher central 2080's nominal allowance for tributaries is 300mm. It is advised that panel base levels should be also incorporate an appropriate freeboard above the 1% Annual Exceedance Probability (AEP) river flood level plus climate change. This freeboard takes into account any uncertainties in modelling/flood levels and wave action (or storm surge effects).

We would draw your attention to page 4 'modelling approach' of the attached climate change guidance note on how to adequately present your information, determine the appropriate design flood level including climate change and then the appropriate base panel level based upon the design flood level.

I have also attached our FRA guidance note for your information.

I trust that the above is of assistance.

Kind regards

Matt

Matt Bennion  
Planning Specialist  
Sustainable Places  
Environment Agency West Midlands Area

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**From:** Rowles, Simon <[Simon.Rowles2@herefordshire.gov.uk](mailto:Simon.Rowles2@herefordshire.gov.uk)>  
**Sent:** 11 September 2023 09:59  
**To:** Justin Stevenson <[justin.stevenson@theruralplanningco.co.uk](mailto:justin.stevenson@theruralplanningco.co.uk)>

**Cc:** Bennion, Matthew <[Matthew.Bennion@environment-agency.gov.uk](mailto:Matthew.Bennion@environment-agency.gov.uk)>

**Subject:** RE: Proposed Solar Farm, the Hop Pocket 23/2448

You don't often get email from [simon.rowles2@herefordshire.gov.uk](mailto:simon.rowles2@herefordshire.gov.uk). [Learn why this is important](#)

Dear Justin,

The design flood level stated does not appear to take account of climate change allowances (see paragraph 3.9 of the Technical Note). I have attached the West Midlands Guidance on climate change allowances (see the table on page 2), with the 'essential infrastructure' allowance being "Wye Peak River Flows" (Catchment 7)... Higher Central (49%). Can you advise me where your consultant is getting their approach from, as I can't see anything in the national guidance below.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please correct me if I am reading this incorrectly, as I don't proclaim to be an expert in this subject area.

Regards,

**Herefordshire.gov.uk**

**Simon Rowles**

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**From:** Justin Stevenson <[justin.stevenson@theruralplanningco.co.uk](mailto:justin.stevenson@theruralplanningco.co.uk)>

**Sent:** 08 September 2023 16:26

**To:** [matthew.bennion@environment-agency.gov.uk](mailto:matthew.bennion@environment-agency.gov.uk)

**Cc:** Rowles, Simon <[Simon.Rowles2@herefordshire.gov.uk](mailto:Simon.Rowles2@herefordshire.gov.uk)>

**Subject:** Proposed Solar Farm, the Hop Pocket 23/2448

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Dear Mr Bennion

I have noted the EA's response to our clients application.

The Technical Note prepared by Rappor that was submitted with the application states in para 3.5 “Approximate flood levels have therefore been interpolated by identifying the highest ground levels that the flood zones extend to”. In the absence of flood data from the EA or Herefordshire Council it was not viable to prepare a detailed flood model for the river Frome.

I hope this clarifies this issue, but should you have any further queries please do be in touch.

Regards  
Justin



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