

Addendum

Proposal: Construction of a 62ha Solar Farm to include the installation of ground mounted solar panels together with associated works, equipment & necessary infrastructure

Location: Land 800 metres South of Park House Farm, Meriden Road, Fillongley

Appeal no: APP/R3705/W/24/3349391

Prepared by The Fillongley Flood Group

Introduction

This Addendum has been prepared by the Fillongley Flood Group (The FFG), who are affiliated to the National Flood Forum. We are opposing the Appellant's Appeal under section 78 of the Town & Country Planning Act 1990. The Addendum supports the Statement which we submitted on 19 November 2024.

The FFG was sent by Fillongley Parish Council a copy of the Appellant's Main Statement of Common Ground (SoCG) and the Fillongley Solar Appeal Plans list on 3rd January 2025. We also understand that there was a Case Management Conference on 7th January 2025 and the Planning Inspector has asked for the parties to agree a SoCG with the Lead Local Flood Authority, Fillongley Parish Council and the Appellant. We hope that the Fillongley Flood Group will be consulted in this process as neither the Lead Local Flood Authority nor the Appellant have engaged with the FFG since we presented the Report prepared by Edenvale Young Associates (EYA) dated 4th July 2024.

Furthermore in order to agree a SoCG we would ask the Appellant and the Lead Local Flood Authority to provide the following documentary evidence and explain the following:-

- A. That they have taken into account the potential runoff from the M6 motorway flowing through the site? Please provide documentary evidence of those calculations.
- B. If they have not taken into account the runoff calculations please explain why they have failed to do so?
- C. Please provide documentary evidence of the impact of the runoff from the M6 motorway together with the runoff from the solar panels?
- D. Please provide documentary evidence of the authoritative research for panels with a dual aspect and the runoff effect from the panels?
- E. We understand that the Appellant's flood risk assessment/drainage strategy did not consider or model the runoff from dual aspect panels. Given climate change and the likelihood of exceptionally dry/wet periods, when the land no longer acts as a sponge, the effect on runoff rate and increased flood risk does not appear to have been addressed. Please confirm that this is the case.
- F. There has been no response from the Appellant or the Lead Local Flood Authority to the Edenvale Young Associates Report of 4th July 2024. In particular the LLFA and Appellant need to consider and comment on the conclusions of EYA's report numbers 19 to 26 listed below:

"19. The swale design as shown will not reduce the runoff rates anticipated. The design should be developed to ensure that water is captured and managed – such as by infiltration with check dams, and that the overflow mechanism is predicted and

illustrated. The swales do not manage runoff as presently shown and would simply convey flows to the lowest points and cause unchecked erosion and silt mobilisation.

20. The detention basins as shown will not attenuate flows in the existing watercourses. The inlets need to be designed to receive water from the watercourses and the outlets designed to mobilise storage – they do not, as presently shown. An indication of the benefits delivered by these ponds should be given, to provide monitoring.

21. The scale and duration of grazing should be specified to ensure that the vegetation is effective in managing runoff.

22. Tracks should be formed in permeable granular material, usually expected to have 30% voids.

23. A project programme should be submitted showing the detention basins and swales installed as a first stage to bring benefits during construction. A project programme should be submitted showing the detention basins and swales installed as a first stage to bring benefits during construction.

24. It is customary to ensure that the fields are vegetated prior to trafficking and the commencement of construction, and that trafficking is avoided in wet conditions when the soil characteristics in the long term can be damaged.

25. It is important to FFG and the community of Fillongley that the LLFA ensures that recommended planning conditions are included in the Decision Notice, if approved, and that the conditions are fully considered by the LLFA prior to being Discharged.

26. On other solar farms the Developer has agreed to have an annual walkaround with the community group to promote good relations and show that the maintenance is being undertaken. We suggest that FFG seeks to agree this with the Operator.”

G. We are aware that the cost of the Appellant’s application has taken valuable resources away from providing everyday flooding solutions and preventative measures not just in Fillongley but the whole of the county. The FFG are therefore concerned that the Appellant has not even secured a generator licence having made enquiries with the NESO. We would ask the Appellant to provide documentary evidence of the generator licence for the site.

Dated 10th January 2025

