



Date: 31<sup>st</sup> August 2023

Dear Ms Curtis,

Ref: DC/21/04711

I write to you on behalf of CARE Suffolk regarding the new Flood Risk Assessment (FRA) documentation provided by EDF Renewables dated 9<sup>th</sup> August 2023 and 16<sup>th</sup> August 2023.

The risk of flooding remains a concern for us and residents, but it is a concern that we believe there are solutions for. In the absence of anyone willing to engage with us (i.e. the applicant, the LLFA, and Council officers) residents continue to feel ignored.

Flooding along Tye Lane is an annual problem which makes the road impassable. Sometimes more than once. We have previously submitted photographic evidence of the extent of this flooding. More recently in the winter of 2022/3 it was so deep near the junction of Tye Lane/B1113 that the southern road verge collapsed and a telephone pole had to be replaced.

All this excess surface water runs off the surrounding fields as they are now, even with winter sown crops, and is exacerbated when the ditch that runs along the southern edge of the proposed site is poorly maintained. The documents submitted by the applicant casually underplay the importance of this ditch and the impact of this flooding. Even more worrying is that the new FRA documents make zero mention of the intention to reduce the capacity of this ditch due to the installation of passing bays along Tye Lane, which was submitted to the Council on 25<sup>th</sup> May 2023. This reduction to existing drainage has not been included in the calculations for the swales either. This issue has been overlooked by the LLFA because it is omitted from the new FRA documents, and because the LLFA did not consult on the documents submitted 25<sup>th</sup> May 2023 to address Highways concerns. This is the exact worry that we expressed would happen, and has now happened.

Furthermore, the Council should be aware of the continued drainage issues that were caused by the laying of the underground cables for EA1 and EA3. We understand the construction of these all followed "best practice". The same best practice we assume the applicant will be required to follow. And yet, drainage issues continue. More drainage work has been undertaken in the past fortnight to the fields directly opposite the proposed site to alleviate the compaction of soil caused by the construction work carried out over 3 years ago. Construction of any sort, including the supposed light work of building a solar farm, can have lasting damage for drainage on clay soils. Especially when worked in wet conditions.

We are pleased to see the continued offer of a swale along the southern edge of the site, despite it lacking the calculations mentioned above. Though the applicant states this is only a precautionary measure, local experience of the flooding would suggest it is a requirement. However, given there are three distinct directions of surface water drainage, we continue to wonder why a "precautionary" swale is not being offered along the eastern and north-western edges too?

We urge the Council to seek:

- collaboration between SCC Flood and SCC Highways regarding the proposed reduction of the southern ditch's drainage capacity created by the passing bays detailed in documents dated 25<sup>th</sup> May 2023 from the applicant. Satisfying one issue by creating another issue is not a sustainable solution.
- an updated FRA and drainage strategy that details the proposed changes to the southern ditch, and recalculates the swale to include the reduced ditch capacity.

- commitment from the applicant that all construction work would take place in drier weather conditions, so as reduce harm to the soil and underlying drainage networks.
- a plan/schedule of works that guarantees the grass land and vegetation strips, that are essential to act as a buffer and attenuate the surface water, are at the necessary maturity to act as a mitigation prior to the installation of the panels onto the frames.
- additional swales along the eastern and north-west boundaries to collect excess surface water.

As usual because no one is willing to proactively engage with the community our concerns remain and the above goes unaddressed, and so we continue to **STRONGLY OBJECT** to the application.

We ask that Mid Suffolk **REFUSE** application DC/21/04711 due to the increased risk of flooding, amongst other reasons which we have previously submitted.

Yours sincerely,



Samantha Main

Chair