

FAO: J Dolman  
Stafford Borough Council  
Development Control  
Civic Centre Riverside  
Stafford  
Staffordshire  
ST16 3AQ

**Our ref:** UT/2016/115468/01-L01  
**Your ref:** 16/24242/FUL  
**Date:** 23 June 2016

Dear Sir

**DEMOLITION OF EXISTING BUILDINGS AND CONSTRUCTION OF A FOODSTORE (USE CLASS A1) WITH ANCILLARY CAFE, CAR PARKING WITH ASSOCIATED ACCESS WORK, LANDSCAPING AND OTHER WORKS**

**WESTBRIDGE PARK SPORTS CENTRE, STAFFORD STREET, STONE, STAFFORDSHIRE, ST15 8QW**

Thank you for referring the above application which we received on 25 May 2016. We apologise for the delay in replying and trust that our comments as set out below will still be taken into consideration.

**FLOOD RISK**

In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reasons.

**REASONS:**

The FRA (ref: NTE-2229-FRA, rev P2, prepared by BWB, dated 13/04/16) submitted with this application does not comply with the requirements set out in paragraph 102 of the National Planning Policy Framework which states that for areas at risk of flooding a site-specific flood risk assessment must be undertaken which demonstrates that the development will be safe for its lifetime and where possible reduces flood risk overall. In particular, the submitted FRA fails to:

1. Undertake a blockage assessment of the Scotch Brook. This site is located to the East of the Scotch Brook which is prone to heavy siltation and potential blockage of the canal syphon and culvert. Flows from the Scotch Brook are likely to impact on this site if a blockage were to occur. A blockage assessment should therefore be undertaken. Model results of a variety of silt levels in the syphon and culvert can be provided by emailing [SWWMcustomers@environment-agency.gov.uk](mailto:SWWMcustomers@environment-agency.gov.uk).

We would recommend that finished floor levels are set at least 600mm above the 1 in 100 year plus climate change flood level (not 300mm as stated within the FRA).

Should the applicant/agent wish to discuss our position with us they are advised to contact Sarah Vincent on 020 3025 3110.

**OVERCOMING OUR OBJECTION:**

You can overcome our objection by submitting an FRA which 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.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours faithfully

**Mr John Dingley**  
**Planning Advisor**

Direct dial 020 3025 3022

Direct e-mail [john.dingley@environment-agency.gov.uk](mailto:john.dingley@environment-agency.gov.uk)