

Jane Curley
Staffordshire Moorlands District Council
Development Control
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Our ref: UT/2021/119463/02-L01
Your ref: SMD/2021/0550
Date: 24 March 2022

Dear Jane,

**APPROVAL OF RESERVED MATTERS, APPEARANCE, LANDSCAPING, LAYOUT
AND SCALE RELATING TO SMD/2018/0234 - FRA**

FOLE DAIRY, UTTOXETER ROAD, FOLE, UTTOXETER.

Thank you for referring the above application which was received on 07 January 2022.

In the absence of an acceptable Flood Risk Assessment (FRA) we maintain our objection to this application on the following grounds:

The submitted FRA by JBA, ref: 2021s1118, dated December 2021 does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the Planning Practice Guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

1. Clarify the following modelling aspects (for more information see attached modelling spreadsheet alongside this response) including:
 - a) Model approach – no files were supplied for sensitivity testing so we have been unable to check this, nothing in the reporting around quantifying uncertainty.
 - b) 1D model build – the updated reporting does not include dimensions of the proposed channel so it is not possible to say whether this is appropriately represented in the model.
 - c) 1D boundary conditions – it looks like the inflow boundary was a ReFH boundary previously and now is an FEH boundary. There is nothing in the reporting to say whether this has been changed so we are unsure whether this is correct / has been changed.
 - d) 1D structures – as with the proposed channel, dimensions for the proposed bridge have not been provided other than the soffit level.
 - e) Model stability – there is no comment on warnings in reporting.

- f) Audit trail – there is no model log or details of file versions supplied.
2. Confirm why Figure 4-2 in the current FRA baseline flood risk is different from Figure 4-2 in the FRA submitted for the Outline Planning Permission (SMD/2018/0234). Please confirm if this is due to the use of LiDAR in the current FRA. If not, please explain why.
 3. Confirm whether the ditches along the A552 are still required or not. Regarding the blockage scenario, the flood level of the new watercourse on the northern boundary of the site is the same as the proposed finished floor levels. Please confirm what mitigation has now been proposed (ditch and bund?) against this residual flood risk.
 4. Confirm the flood risk to the 5 properties at the south-east of the site because:
 - a) Although the flood risk may be reduced as the proposed 'external levels plan', ref: 21047-100, rev D suggests ground levels will be higher than the flood levels as shown on Figure 3-4 in Appendix C, Figure 4 suggests that this area of the site remains at flood risk. As such further explanation of the flood risk in this area is needed.
 - b) Modelled flood levels in Appendix C appear to be at the same level as the proposed finished floor levels in this part of the site and the 1 in 1000 year flood level is higher than proposed finished floor levels.
 5. Include a table of the modelled flood levels for the River Tean, or a paragraph on flood risk to the proposed development layout from this source. It is also not clear how far the River Tean modelled flood levels may back up the proposed channel and influence flood levels within the brook.
 6. Include an updated drawing of B15296-225 to show the currently proposed channel and easements. Please also mark the floodplain extents (1 in 100yr plus 30% climate change) and 3m easement on Drawing number 21047-100, rev D as contour lines.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA (including modelling information) and drawings which address the issues detailed above. If this cannot be achieved, we are likely to maintain our objection.

Finally, in accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

If you have any queries contact me on the details below.

Yours faithfully

Ms Anne-Marie McLaughlin
Senior Planning Advisor

Direct dial 020 3025 4111

Direct e-mail anne-marie.mclaughlin@environment-agency.gov.uk

End

Modelling Quality Assurance Record (QAR)

Pre-project (to be filled at project startup)	
Project name:	Fole Dairy, Uttoxeter Road, Fole, Uttoxeter
Environment Agency BIM Number:	
Internal or external project?	
Targeted quality level:	
E&R Team Leader/Senior Team L. :	
E&R Technical Lead (Assurer):	
Area senior user:	
Project manager name(s):	
Area(s) Involved in the project:	
Cost of related scheme:	
Assumed number of properties impacted:	
Assumed critical infrastructure impacted (list/summary):	
Assumed essential infrastructure impacted (list/summary):	
Level of Assurance:	
Technical Assurance Lead (TAL):	
Planned Reviewer: (name of individual or/and supplier)	Faye Thompson
Important additional checks to be undertaken on this modelling project: (To be filled by TAL)	
Before the start of the project:	
As Team Leader/Senior Team L. I have:	
Appointed both Reviewer and Assurer and made sure they have appropriate level to review and as:	
Ensured there is no conflicts of interest (eg. Assurer ≠ Reviewer)	
Ensured the use of an external Reviewer and/or Assurer is possible. (if needed)	
Ensured the above has been completed by the relevant and competent people.	
Signed:	

Post project (this only signs o

At project completion	
As Reviewer:	
I confirm the review was undertaken with the data provided to us at the time of the review and this s knowledge about this model at this time.	
Signed Reviewer:	

At project completion	
As Assurer:	
Achieved quality level:	
I confirm review actions have been carried out to full satisfaction. The model either meets the requi modelling standard or is clearly documented as to why not. have completed the relevant section of with relevant users.	
Signed Assurer:	

At project completion	
As Team Leader/Senior Team L. I have:	
Review tasks outlined above have been carried out by the appropriate person, the review material h and saved in the central repository.	
Signed:	

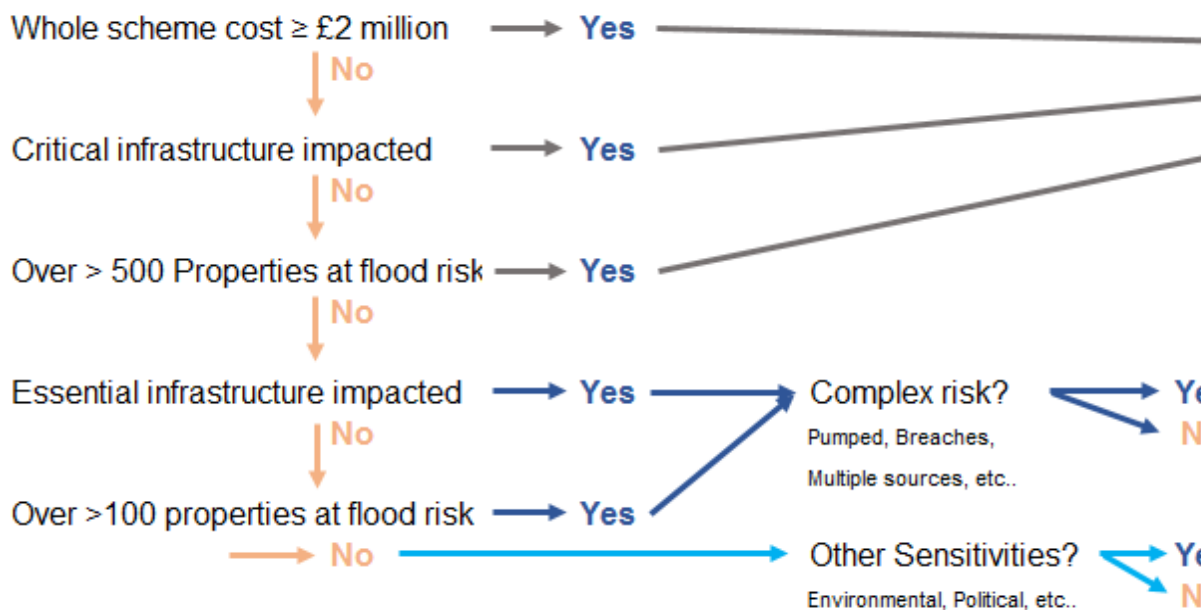
R)

meeting or for FRA's at reception of work).

Previous model condition:	
Date QAR first completed:	
Date of last QAR update:	
Date of project completion:	

Comment colours:	Review 1	Review 2
Red	2	0
Amber	6	0
Green	11	0
N/A	42	0
Advised outcome to the Assurer:		

Guide for assurer level of review:



sure against assurance level.	
Date:	

ff the technical quality of the model).

spreadsheet is filled with the best of my

Date:

New model condition:

red standards as set in the scope and
the end user acceptance form and shared it

Date:

has been filed both with the project details

Date:

Review 3	Review 4
0	0
0	0
0	0
0	0

