

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

Our ref: SV/2026/113414/01-L01
Your ref: SMD/2025/0397
Date: 21 January 2026

Dear Sir/Madam

**CHANGE OF USE FROM C3 DWELLING TO NURSERY AT SHOETIME, 180
UTTOXETER ROAD, BLYTHE BRIDGE, STAFFORDSHIRE, ST11 9JR**

Thank you for referring the above application which was received on the 8 January 2026. The proposals are for the change of use of a current residential dwelling to enable an extension to the adjoining day nursery. Whilst both uses are considered 'more vulnerable' the proposed use will remove any overnight accommodation from the building. The total footprint, including the existing nursery, will be 559m².

We would therefore have no objections to the proposed development and would offer the following advice for the benefit of landowner/occupier and the environment:

FRA requirements: The NPPG contains a useful checklist for FRAs at paragraph 080 of the Flood Risk and Coastal Change Section. For Minor development it is suggested that applications be accompanied by a simple Flood Risk Assessment (FRA) which confirms in writing that as a minimum:

Either

- (1) Floor levels within the proposed development will be set no lower than existing levels and,
- (2) Flood proofing of the proposed development has been considered by the applicant and incorporated where appropriate to 1% (1 in 100 chance each year) river flood level including climate change allowance.

OR **preferably** that:

- (3) Floor levels will be set 600mm above the known or modelled 1% (1 in 100 chance each year) river flood level or 0.5% (1 in 200 chance each year) tidal & coastal flood level (including climate change allowance). This should be demonstrated by a plan to Ordnance Datum/GPS showing finished floor levels relative to the known or modelled flood level.

Floor levels: From a flood risk view point, the ideal mitigation in terms of floor levels is to ensure that these are set 600mm above the known or modelled 1% (1 in 100 chance each year) plus climate change flood level. However, in the case of an extension or

Environment Agency
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

change of use it will often not be practical to raise floor levels given the potential effects on other issues such as access (including that for disabled users), usability and visual amenity. In this instance we note that floor levels are to remain as existing, and consistent with the existing nursery, which are in excess of 300mm above street level.

Flood proofing: The Environment Agency recommends that in areas at risk of flooding, consideration be given to the incorporation into the design and construction of the development of 'flood proofing' measures. These include removable barriers on building apertures such as doors and air bricks and providing electrical services into the building at a high level so that plugs are located above possible flood levels. Such measures could also be considered to protect existing property.

Additional guidance, including information on kite marked flood protection products, can be found on the Environment Agency web site at <https://www.gov.uk/prepare-for-a-flood>.

For more information on property resistance and resilience techniques see the Ciria Guidance:

[New guidance: Code of practice for property flood resilience \(C790\) \(ciria.org\)](#) and also:

http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

Flood level data, the 2006 River Blythe Model in this instance, to help inform flood proofing, access and egress along with the Flood Management Plan may be obtained from our Area Customers & Engagement team on telephone 03708 506506;

Enquiries_WestMids@environment-agency.gov.uk

Access and Egress: Paragraph 047 of the NPPG advises on how a development might be made safe from flood risk including detail on access and egress.

Pedestrian access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, the FRA may demonstrate that pedestrian access is acceptable based on an appropriate assessment of 'hazard risk' including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). Reference should be made to DEFRA Hazard risk (FD2320) – 'Danger to People for Combinations of Depth & Velocity' (see Table 13.1 – DEFRA/EA Flood Risk Assessment Guidance for New Development FD2320 at: http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2320_3364_TRP_pdf.sflb.ashx

Whilst floor levels are to be set as existing it should be noted that the submitted Flood Risk Assessment (FRA) does not include the relevant flood levels which may assist when considering safe access/egress and how the site will be managed in a flood event. You may wish to request that the application acquire these levels, via the contact details above, to inform flood management of the site in a Design Flood Event.

Given our role and responsibilities we would not make comment on the safety of the access or object on this basis. This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We recommend you consult with your Emergency Planners and the Emergency Services to determine whether they consider this to be safe in accordance with the guiding principles of the NPPG.

Furthermore access and egress by vehicular means is also a matter for your Emergency Planners and the Emergency Services.

Flood Evacuation Management Plan: The NPPG (paragraph 043) states that one of the considerations for safe occupation is whether adequate flood warning would be available to people using the development.

We do not normally comment on or approve the adequacy of flood emergency response and flood evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users if they sign up to the Flood Warnings Service.

The NPPG (para 45) places responsibilities on LPAs to consult their Emergency Planners with regard to specific emergency planning issues relating to new development. We would advise that you take account of the guidance within NPPG (para 44).

We would advise that the Flood Evacuation Management Plan should identify a flood level that will initiate evacuation of people and vehicles, and any subsequent closure of the building/car park. This trigger level should be when the access/egress is still 'dry' i.e. flood-free, to avoid any question of what is an acceptable level of flood risk to occupants.

We note that a Flood Plan has been submitted with the planning application. This could be augmented with modelled flood levels as discussed above.

We recommend you consult with your Emergency Planners and the Emergency Services to determine whether they consider the development safe and whether a FEMP secures safe and sustainable development.

Informative (note) to above: The Applicant /future occupiers should contact 08708 506506 to be set up on our flood warning system. In preparing the evacuation plan the applicant should have note to the FRA. Contact with the Environment Agency would enable the provision of the most up to date, best available, flood information.

Yours sincerely,

Mrs. Nanette Brown
Planning Officer
Email: westmidsplanning@environment-agency.gov.uk