

Since my initial observation I have managed to obtain the latest Flood Constraints Report for Westbridge Park \*<sup>1</sup>(this document is J6 in the Examination Library). I was unable to obtain this document from Stafford Borough on two occasions and so applied to the Freedom of Information Act. Capita Symonds, the consultants released the documents. It reports on the flood level status of the land which Stafford Borough Council is proposing a change in use to "Mix Use".

\*<sup>1</sup> Stafford Borough Council: Westbridge Park, Stone, Staffordshire. Flood Constraints Report Final - March 2010: **Consultants:** Capita Symonds, Devonshire Green House, 14 Fitzwilliam Street, Sheffield S1 4JL.

Page 7 of this document in section 4.1 defines the area in terms of flood risk:

*"The existing Environment Agency Flood Zone Map shows that the Westbridge Park site lies within areas at medium and high risk of flooding, Flood Zone 2 (between 1% and 0.1% chance of flooding or within the 1 in 1000 year return period flood outline) and Flood Zone 3 (>1% or within the 1 in 100 year return period flood outline)."*

My previous submission provides photographic evidence of flooding in adjacent areas and this report shows revised flood zones (appendix) , enlarging flood zone 3 (including the site of the proposed supermarket page 14 location map).

I wonder whether a sequential test would be passed?

7.3 on page 12 states:

*" PPS25 requires that all developments pass the Sequential Test, designed to steer development to areas of low flood risk. Stafford Borough Council or their agents would need to show that there are no alternative sites that are at a lower risk from flooding and which are considered available. "*

This is clearly not the case since other sites have been identified. e.g. Trent Valley Trust <http://alittlebitofstone.com/2013/02/01/is-this-a-better-site-for-a-new-supermarket/>

*7.6 Capita Symonds recommend that a **Sequential Test be undertaken** as a priority to determine whether the development is feasible from a planning perspective. Only then should further consideration of whether the site is or can be safe from flooding be undertaken.*

*7.7 Assuming that the **Sequential Test is passed**, it is recommended that further analysis be undertaken into whether the development can be safe from flooding and will not increase flood risk elsewhere. The existing hydraulic model of the River Trent will be suitable for this and will provide the basis for identifying and testing mitigation options. This is likely to focus on the availability of compensatory storage on a like-for-like basis given the anticipated need to raise floor levels above the current 100-year flood level (plus an allowance for climate change) of 86.0m AOD. In addition to compensatory storage, the site will ideally need dry access.*

*7.8 If it is both technically feasible to develop the site and acceptable from a planning perspective then a flood risk assessment that meets the requirements of PPS25 will be required. The flood risk assessment will need to show that there has been consideration of climate change for the anticipated lifetime of the development and that residual risks from events in excess of the 100-year plus climate change have been considered including evacuation planning in the event of a flood event.*

*7.9 In addition, it should also show how surface water runoff at the site will be managed to ensure no increase in runoff rates and ideally volumes. The Stafford Borough Council Level One Strategic Flood Risk Assessment (SFRA) advocates the incorporation of Sustainable Drainage Systems (SuDS) within new development where practical and any appropriate land management techniques that could reduce surface runoff. Management of surface water runoff should also consider exceedence events where the system capacity is overwhelmed”*

With climate change taken into some consideration the floor level of any new development would be 86.6m and a structure built in these zones could expect to have floor at least 1m above the ground level. Presumable roads and flood defence measure would also reflect similar consideration and whilst this might be technically achievable it is not desirable. Consider Government Inspector CM Pritchard’s observations regarding the Trent and Mersey Canal area:

*“As I perceived it, the land forms an integral part of the predominantly undeveloped valley floor which contributes to Stone’s distinctive urban form. Accordingly therefore, I find the land’s designation as Green Network appropriate.”*

Furthermore

Stone Conservation Area Character Appraisal: Adopted 2 October 2008, on Page 20 also reflects upon the aesthetics of the park

*“6.7 The most prominent landmark within the conservation area and beyond is the stone-built tower of St Michael’s Church which can be viewed from many parts of the town and from the canal towpath and is one of the defining features of the town. The most impressive view is obtained along the approach to Stone from Walton where the church stands well above its surroundings. Unfortunately this view is spoiled by the blue Westbridge modern sports centre (outside the conservation area) in the foreground.”*

We should also consider a PPG17 Assessment of the Park

Stafford Borough Council PPG17 Assessment and Open Space, Sport and Recreation Facilities Strategy: Final Report: March 2009: Consultants: Kit Campbell Associates, Edinburgh.

p. 45: Greenspace Issue 2: Formal Parks, Stafford Borough Council are asked to:

*“Consider enhancing the area close to the Westbridge Park Fitness Centre in order to make it more “park-like” and attractive for informal activities. It will also be desirable to open up greater access to the river and canal, particularly if the proposed marina proceeds, and link the park to the Stone Meadows Local Nature Reserve to the north and other land to the south.”*

p. 201: Recommendations: The Borough Council should:

*“Consider enhancing the area close to the Westbridge Park Fitness Centre in order to make it more “park-like” and attractive for informal activities. It will also be desirable to open up greater access to the river and canal, particularly if the proposed marina proceeds, and link the park to the Stone Meadows Local Nature Reserve to the north and other land to the south.”*

And again on Page 215: Recommendations

*“The Borough Council should consider relocating the Westbridge Park Fitness Centre to the Alleyne’s Sports Centre in order to achieve economies of scale, subject of course to the conclusion of a suitable joint use agreement.”*

My concerns regarding, safety of shoppers who may be trapped in a flood prone building or on access roads have been heightened by the Capital Symonds report. Furthermore there are real

concerns about possible increased flooding downstream at Little Stoke or Aston and the costs of flood mitigation schemes.

In summary, Westbridge Park should not be transformed into an area of mixed development and should retain its green status and green credentials in line with its role in the Green Infrastructure GI. Further development of buildings on an area prone to flooding should be avoided and the local authority must comply with all Environmental Agency Standards defined in PPS25.

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