

Cumberland Council  
Development Control  
The Copeland Centre Catherine Street  
Whitehaven  
Cumbria  
CA28 7SJ

**Our ref:** NO/2025/117180/01-L01  
**Your ref:** 4/25/2395/0F1  
**Date:** 15 December 2025

Dear Sir/Madam

**APPLICATION TO DETERMINE IF PRIOR APPROVAL IS REQUIRED FOR THE  
CONVERSION OF THE FIRST AND SECOND FLOOR OF THE EXISTING BUILDING  
TO FORM 8 RESIDENTIAL UNITS**

**TANGIER BUILDINGS, TANGIER STREET, WHITEHAVEN**

Thank you for consulting us on the above planning application on 27 November 2025.

**Environment Agency position**

In the absence of a flood risk assessment (FRA), we object to this application and recommend that planning permission is refused.

**Reason**

The application site partially lies within Flood Zone 3 and 2, which is land defined by the planning practice guidance as having a high and medium probability of flooding. The NPPF (paragraph 181, footnote 63) and the Flood Risk and Coastal Change Planning Practice Guidance (paragraphs 20 and 21) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

**Overcoming our objection**

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

Environment Agency  
Ghyll Mount (Gillan Way) Penrith 40 Business Park, Penrith, Cumbria, CA11 9BP.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if an FRA is submitted and we will respond within 21 days of re-consultation.

Guidance on how to prepare a flood risk assessment can be found at [Flood risk assessments: applying for planning permission - GOV.UK](#).

### **FRA sources of information - advice to applicant**

We do not prepare or provide FRAs, however, relevant flood risk data can be ordered via our [Flood Map for Planning page](#) or our Customers and Engagement teams can provide any relevant flood risk information that we have available.

Your LPA should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your LPA to determine what information is available. Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: [Flood risk and coastal change - GOV.UK](#).

Yours faithfully

**Hui Zhang**  
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