

Ms Sarah Papaleo  
Copeland Borough Council  
Development Control  
The Copeland Centre Catherine Street  
Whitehaven  
Cumbria  
CA28 7SJ

**Our ref:** NO/2024/115993/01-L01  
**Your ref:** 4/24/2090/OF1  
**Date:** 09 April 2024

Dear Ms Papaleo

**CONVERSION AND CHANGE OF USE OF THE FIRST AND SECOND FLOORS INTO TWO 2 BEDROOM HOLIDAY LETS AND CONVERSION OF LOFT INTO A 1 BEDROOM HOLIDAY LET (USE CLASS C3) WITH INTERNAL AND EXTERNAL ALTERATIONS**

**49 KING STREET, WHITEHAVEN**

Thank you for consulting us on the above application, which we received 27 March 2024.

**Environment Agency Position**

The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Unda Consulting Limited, referenced 90087-Perriment-KingSt and dated November 2020. We have reviewed the FRA in so far as it relates to our remit, and we are not satisfied that the development would be safe without exacerbating flood risk elsewhere.

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

**Reason(s)**

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Identify and assess supporting data that demonstrates the flood risk at the proposed site. The FRA makes references to Product 4 being requested but this is not attached in the appendices or assessed. This should show the “design flood” for the site for the lifetime of the development which is the flood event of a given annual flood probability, which is generally taken as:
- river flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year) or tidal flooding likely to occur with a 0.5% annual probability (a 1 in 200

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- chance each year);
- plus, an appropriate allowance for climate change. There is no assessment of the impact of climate change using appropriate climate change allowances. See: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. Central/higher sea level allowances for the North West Area of England should be applied to the relevant epoch for the proposed lifetime of the development.

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

### **FRA guidance and sources of information – advice to applicant**

Guidance on how to prepare a flood risk assessment can be found at: [Flood risk assessments if you're applying for planning permission - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-if-youre-applying-for-planning-permission).

Further advice on what to include in an FRA can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

Our flood risk data packages (e.g. Product 4 package), which can be used to inform FRAs, can now be requested via the Flood Map for Planning service on GOV.UK: [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/guidance/flood-map-for-planning).

Alternatively, you may submit an information request by email to our local Customers and Engagement team at [inforequests.cmbinc@environment-agency.gov.uk](mailto:inforequests.cmbinc@environment-agency.gov.uk).

Yours sincerely

**Miss Isabel Garbutt**  
**Planning Advisor**

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