

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

Our ref: NO/2023/115373/01-L01
Your ref: 4/23/2166/OF1
Date: 10 July 2023

Dear Ms Unsworth

ERECT GRANNY FLAT ANNEX AND GARAGE EXTENSION.

HERONS REACH, THE GREEN, LA18 5JA

Thank you for consulting us on the above planning application.

Environment Agency position

With reference to the Environment Agency Flood Map for Planning, this application lies within Flood Zone 3, which is land defined by the planning practice guidance (PPG) as having a high probability of flooding.

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

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:

- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- take the impacts of climate change into account:-
 - There is no assessment of the impact of climate change using appropriate

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

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climate change allowances. In this case the South West Lakes Management Catchment peak river flow central allowance of 30% for the 2080 epoch. The guidance is [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances)

- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design may be inadequate because they may not make the development resilient to the flood levels for the lifetime of the development . Consequently the development is likely to propose inadequate
 - Raised finished floor levels
 - Flood storage compensation
 - Resistance and resilience measures
 - Safe access and egress routes

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 consult us on any revised FRA submitted and we will 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.

Yours sincerely

Hui Zhang
Planning Advisor - Sustainable Places
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