

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

**Our ref:** NO/2023/115373/03-L01  
**Your ref:** 4/23/2166/0F1  
**Date:** 26 October 2023

Dear Ms Unsworth

**ERECT GRANNY FLAT ANNEX AND GARAGE EXTENSION.**

**HERONS REACH, THE GREEN, LA18 5JA**

Thank you for re-consulting us on the above planning application, following the submission of a revised FRA.

In our letter reference NO/2023/115373/01-L01 and dated 10 July 2023, we objected to the development as proposed, pending the submission of an acceptable FRA.

Our letter included a number of links to information guidance and sources information. We have subsequently requested flood risk assessment data on behalf of the customer from our data, mapping, modelling and information team and have passed this onto the customer to assist in revising their Flood Risk Assessment (FRA).

The planning application is now accompanied by a revised Flood Risk Assessment (FRA) prepared by Alan Park, referenced; Ref 4/23/2166/0F1, Rev 3 and dated October 2023.

**Environment Agency position**

We have reviewed the FRA and the accompanying block plan showing the ground levels and floor levels of the existing and proposed buildings, along with the information on Black Beck, and in so far as it relates to our remit, and while we are satisfied that the proposed development would not increase flood risk elsewhere we remain unsatisfied that it has not been demonstrated that the development would be safe.

Unfortunately therefore, we are therefore minded to maintain our objection to the

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)

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development as proposed.

## **Reason**

The block plans showing floor levels of the existing and proposed buildings have not been updated in order to compare to any best available flood levels provided by the EA (and now presented in the appendices of the FRA) with the proposed finished floor levels in m AOD.

The FRA therefore fails in its primary remit of assessing the likelihood of the development being subject to flooding over its lifetime, what the source and depth of this flooding may be on site and any proposed water exclusion measures, if necessary. This is of particular importance considering the proposal for the single story 'Granny Flat' annex.

In our letter referenced NO/2023/115373/02-L01 and dated 22 August 2023, we said it will be necessary to obtain levels in m AOD for the site and the proposed Finished Habitable Floor Levels. Currently the FRA refers to the existing property as '0' datum.

## **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.

Yours sincerely

**Hui Zhang**  
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