

From: David Bechelli [REDACTED]
Sent: Wednesday, May 17, 2023 10:07 AM
To: Christie Burns [REDACTED]
Subject: 4/23/2125/OF1 - LAND NORTH OF KING STREET, MILLOM

Hi Christie,

I have reviewed the Flood Risk Assessment submitted with the above Planning Application and have the following issues with it:

- It states that Environment Agency have confirmed that the site is protected by flood defences managed by Copeland Borough Council. This source of this needs to be checked. Whilst the former railway embankment on Copeland land acts as a flood defence, it is not a designated flood defence and is not managed as one.
- It is stated that considerable investment has been made in the provision of flood defences to protect the area. Can this be explained, as I am not aware of any investment.
- A climate change allowance of 40% has been mentioned, when it is now 50% for this region.
- It doesn't actually state how surface water will be disposed of.
- Other than greenfield run off rates, there are no calculations or the surface water generated by the development.

- It is suggested that water butts are used as a form of attenuation. How will this work in reality if they are full and the residents are away from the property?
- It is suggested that infiltration devices such as soakaways are used, yet no percolation testing has been undertaken to determine permeability and the width of the garden is such that any soakaway could not comply with Building Regulations.
- It is stated that in an exceedance event that the property will be free of flooding, but the argument about storage in the drainage system is not convincing. There isn't even any drainage show.
- It is stated that Exception Test has been satisfied, but this is really a LPA matter to determine, rather than a FRA matter in my opinion.

In my opinion the FRA fails to demonstrate that the development is safe from flooding and does not increase flood risk elsewhere.

Regards

Dave

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