

Cumberland Council (Copeland) -
Development Management
Market Place, Whitehaven, CA28 7JG

Reference: PA-0005386/01
Customer reference: 4/26/2166/0F1
12 June 2026

CONVERSION OF SECOND FLOOR TO FORM THREE RESIDENTIAL FLATS

74 MARKET PLACE WHITEHAVEN CA28 7JG

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation 4/26/2166/0F1.

The planning application is accompanied by a 1-page document title Flood Risk Assessment (FRA) author and date unknown.

We have reviewed the FRA in so far as it relates to our remit, and we would advise the FRA is extremely poor and limited in its content and presentation of flood risk and clearly and evidently fails to meet the minimum standards in line with the guidance.

Environment Agency position

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 application site lies within Flood Zone 3 which is land defined by the planning practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 173, footnote 59) 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.

It is acknowledged the habitable floor levels may themselves be above any predicted flood levels, however access and egress during time of flood may be compromised and there is potential for residents to be exposed to flood hazards that have not been identified in the submitted document.

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.

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.

Please refer to:-

<https://flood-map-for-planning.service.gov.uk/>

Guidance on how to prepare a flood risk assessment can be found at

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

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).

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

Additional Information- New national flood and coastal erosion risk information and FRA template

The Town and Country Planning Association (TCPA) working collaboration with the Environment Agency have produced updated guidance materials and tools for developers and Flood Risk Assessment (FRA) consultants.

This page hosts information about the Environment Agency's new flood and coastal erosion risk data:-

<https://www.tcpa.org.uk/resources/new-national-flood-and-coastal-erosion-risk-information/>

In addition, to address frequent requests from Local Planning Authorities, the public and those involved in producing basic FRA's, but who are not flood risk professionals, we have worked with the TCPA to produce a [Flood Risk Assessment Template \(v1\)](#).

We hope by providing access to a template that is consistent with the requirements of the PPG and NPPF, that this will help reduce the number of potentially unnecessary planning objections that are based on inadequate FRAs.

The template and guidance can be found here: -

https://ecab.planningportal.co.uk/uploads/ea/Environment-Agency_Flood-Risk-Assessment-Template.docx

https://ecab.planningportal.co.uk/uploads/ea/Environment-Agency_Flood-Risk-Assessment-Template_Guidance.pdf

If you have any questions regarding our response, please contact clplanning@environment-agency.gov.uk.

Yours sincerely,

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