

# F SUMMERFIELD

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Planning Dept  
Manchester City Council  
P O Box 532 Town Hall  
Manchester M60 2LA

Ref: FS/apg/DelacourtRd14/170120/1

17 January 2020

Dear Sirs

**Re: Application Number 125777/FH/2019**  
**14 Delacourt Road, Manchester M14 6BX**  
**Flood Risk Assessment**

Please forgive my protest regarding the demand for a flood risk assessment in a case where there is an extension to a property – as above. You have identified that the property lies with a low-risk flood area which – according to the need to tick the box – needs a flood-risk assessment. Of that there is no issue.

A land-level survey costs the applicant upwards of £500 + VAT and will boil down to being unable to add protection for the property or its extension because, in the event of a flood, the existing parent property will be inundated.

The existing property is at risk – flood water will seep into the under-floor cavity as a minimum and if the level of flooding is as predicted the ground floor will be inundated as a matter of course.

The new extension can be raised or protected to offset the flooding but will be materially above the existing ground-floor level of its parent property which essentially introduces a health and safety issue of differential levels contrary to any policy of safety in the home on the one hand and the DDA criteria, that the Council fully supports, which differentiate against unnecessary split levels in normal living accommodation.

My objection, which is personal, to the need for these flood risk assessments is:-

1. In areas of flood risk the policy of the Council ought to be clear and unequivocal. Currently, it is more of a box ticking exercise rather than a coherent assessment of real and deeply serious issues.
2. For new properties, which this is not, the option for defence against flooding have no collateral impact. The measures can be effected independently of any other or surrounding property or buildings.
3. For existing properties, extension is either to be prohibited because effective defence means are almost always impossible to implement retrospectively – not for the extension but the existing property that is.
4. Existing properties with cellars or having any form of undercroft are completely exposed and prevention against flooding is largely one of King Canute and the sea – impossible to prevent.

5. The implication for forming, by demand, differential levels between and in the same property is anathema to logic and good common-sense. Generations ago it would not have seemed as unreasonable and nonsensical as it does now to seek to allow the prospect of an increment in the risk to the domestic household. Statistics tell us that the greatest risk for accidents is in the home.
6. Perhaps the greatest issue, in my opinion, is that the single/double step has been eliminated because they are very seriously potent causation of falls. Any demand of a Flood Risk Assessment that lifts the level of an extension above the existing restores that previous risk.

My plea in this matter is that of asking for common-sense to prevail. Either decline to approve development to existing property in flood risk areas or accept that the condition to be created is no worse than the existing – the common-sense approach to similar problems when considering DDA situations.

Yours sincerely

Frank Summerfield

