

FAO: Chris Panton
East Lindsey District Council
Planning & Regeneration
Tedder Hall
Manby Park
Louth
LN11 8UP

Our ref: AN/2022/132934/01-L01
Your ref: S/090/00494/22
Date: 08 April 2022

Dear Chris

**Siting of 60no. staff accommodation pods and 6no. staff canteen pods
The Spa, Butlins Funcoast World, Roman Bank, Ingoldmells, PE25 1NJ**

Thank you for consulting us on the above application, on 23 March 2022.

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

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. 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. The proposal does not show consideration of access and egress of people during a design tide flood event.
- There is a requirement for a seasonal occupancy restriction for this type of development in this location

Overcoming our objection

The FRA does not make any reference to the Environment Agency's Hazard Mapping. Our Hazard Mapping shows the consequences should a breach or overtopping of our sea defences occur, including the likely flood depths, velocities and overall hazard that could impact the site over its lifetime.

The site has a current day hazard classification of 'danger to most' as defined in Research & Development report FD2320 'Flood Risk Assessment Guidance for New

Development'. It could experience flood depths of 0.5-1.0 metres arising from a breach in the defences during a flood that has a 0.5% chance of occurring in any one year and a 0.1% chance of occurring in any one year for the present day scenario.

Our current model does not take into account the underpasses on site at Butlins which means that the consequences of a flood event could be more severe than our model outputs evidence.

In order to ensure the cabins are not occupied during winter months when the risk of tidal flooding is at its highest, to reduce the risk of loss of life during a flood event [in accordance with policy SP19(7) of the East Lindsey Local Plan, July 2018 and paragraph 167 of the National Planning Policy Framework] we would require that no cabins on the site shall be occupied between 1 November (or the following Sunday, if half terms extends into November) in any one year and 14 March in the succeeding year.

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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Rebecca Flint
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