DESIGN & ACCESS STATEMENT & FLOOD RISK ASSESSMENT

For

ERECTION OF TWO - SINGLE STOREY EXTENSIONS ON TEMPORARY PERFORMANCE BUILDING, TO ACCOMMODATE STAGE AND PERFORMANCE SERVICES, BAR SERVERY, AND TOILET FACILITIES

At

Butlin's Skegness Resort Roman Bank Skegness Lincolnshire PE25 1NJ

Easting: 557315 Northing: 367391

Easy Lindsey District Council – Coastal South Area - Skegness Flood Zone 3 – At Risk of flooding from rivers or sea without defences Minor Development in Low Vulnerability Classification

APPLICATION FOR FULL PLANNING PERMISSION

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Issue	Date	Status	Issue By	Checked by
01	27/08/21	Preliminary	JMD	-
02	31/08/21	Final	JMD 300821	RJD300821



INTRODUCTION This statement has been prepared following guidance of the Commission for Architecture and the Built Environment (CABE) and has been supplied to record the process undertaken in the preparation of the accompanying submission.

1.0 DESIGN PROCESS

1.1 BACKGROUND

Butlin's is a chain of holiday resorts founded by Sir William Heygate Edmund Colborne 'Billy' Butlin to provide affordable holidays for all with Entertainment at its heart, the Skegness report officially opened to guests on the 11 April 1936. The resort is owned, occupied, and operated by the Bourne Leisure Group in partnership with Blackstone Capital Partners and Blackstone Real Estate Partners, and operates under the Butlins Brand. Bourne Leisure employs more than 16,000 team members, hosts 25,000 holiday homeowners, and attracts 4.5 million guests to its 56 sites across the UK every year.

The submitted application is associated with Butlin's sectoral role as a major UK entertainment holiday resort attracting between 10, 000 and 12,000 persons a week, and a temporary performance venue today named Studio 36 commemorating Sir Billy Butlins first resort which opened here in Skegness, in 1936. Studio 36 - the venue, was consented on a temporary term basis of 3 years from date of permission by the East Lindsey District Council, decision notice reference S/090/02215/20 dated 26 January 2021, and it operates harmoniously within the limits of planning and licence conditions, with no reported complaints within the consented term too date.

1.2 DESCRIPTION OF PROPOSED DEVELOPMENT

Erection of Single Storey extension providing Dressing Room and Wardrobe space.

1.3 THE REASON FOR THIS APPLICATION

The global pandemic of 2020 imposed severe health and wellbeing restrictions on the resorts operational processes including the use of indoor spaces, limiting occupation numbers, and enforcing wide spacing for sound reason of public health. The temporary venue was installed as a reaction to these demands, it was well conceived and extremely well implemented, its success has overwhelmed the leadership and continues with every performance, to 'wow' its guests. Ever influenced however by expectation, Butlin's must constantly evolve to secure interest, and to drive new sales. This places the stage and performance teams under constant pressure to excel and they can only achieve this if they are well supported. This application would therefore seek the planning authorities consent for extension of the Studio 36 venue, with the purpose of creating new operational and guest service facilities.

1.4 LOCATION OF SITE

The two proposed extensions would be attached to the North & East Elevations of the Studio 36 performance venue in the positions shown here as red blocks directed by black arrows, both extensions would stand on existing firm level MOT1 hardcore surfaces adjoining the existing venue, without influencing consented or conditioned features of the pre-existing venue structure.

The attached image is provided by Google mapping, and is presented with a Northerly Orientation, the existing venue is shown with a red boundary and the proposed extension is shown as a red block, the layout must be read in conjunction with the attached location plans and detailed layout plan.



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1.5 SUPPORTING INFORMATION ABOUT BUTLINS

The resort comprises approximately 138 acres (55.587 Ha) of land which is separated into East and West collections of buildings and operations by the A52 Roman Bank, which passes between Skegness to the South and Ingoldmells to the North. The resorts westernmost boundary is defined by Back Lane, and the easternmost boundary is defined by a pedestrian promenade which adjoins the North Sea. The resort takes its vehicle and main pedestrian access from Roman Bank to the North, the boundaries adjoins Sealands Holiday Home Park, and to the south, the Seaways Holiday Park. There is a pedestrian entrance into the resort through the eastern boundary with the promenade however, this is operated on a day pass basis allowing guests to and from the promenade. The resort operates its Entertainment operation from the eastern land block, and its own caravan park from the western land block.

The site is relatively flat and level and lies within a flood Zone 3 behind long standing and functional sea defences. The resort has an internal piped drainage network comprising separated foul and water disposals, the foul water system is stored and pumped into the main drainage system operated by the Anglian Water under the eye of the Lincolnshire County Council as LLFA.

The site has two formal entrance points for vehicle and pedestrians, these are located along the central boundary with Roman Bank in each case, one serves the eastern land block, and one serves the western land block. Each site has an internal road network which allows free passage of vehicles, the Eastern network affords circulation for operator's vehicles along with those guest access to two drive through check in arrangements, which lead into multiple main car parks, which are located according to residential layouts. The road network serving the caravan park affords access to private parking associated with each van base, there are in the region of 2400 parking spaces on the site to service the resorts 1850 units of holiday accommodation. The resort is comprised of a large number of detached residential and commercial structures which vary widely in height, the central feature of the resort is the Skyline pavilion, which is the iconic leisure and entertainment heart of the resort, its illuminated tensile covering and support poles reach high into the sky. The site does not lie in a conservation area however, there is a Grade II listed building within the resort, positioned centrally along the easternmost boundary.

The resort is positioned 3.5km from Skegness town centre and is also connected to the town centre and wider afield by local bus routes from which collection points are positioned immediately adjoining each of the resort's pedestrian entrance points. Stagecoach Group, provide service links weekly and daily, including connections to Skegness where Coach and Train services extend across the UK.

In addition to providing holidays and short breaks, Butlins welcomes day visitors to the resort, using an individual or family pass for which part day or return, armed, and emergency service discounts are offered. Butlins is a significant local employer offering career path training and apprenticeships by working closely with Lincolnshire training providers including First College, the resort attracts visitors in their hundreds of thousands per year to Skegness and Ingoldmells, its supply chain includes local service and suppliers, and a significant secondary spend may be derived by association also, thorough positive community support including the resorts associations with local sporting, training, and charitable trusts.

Construction works would be limited in their physical form, comprising mostly ground works including the placement of a concrete floor and the installation of Utility Services for toilet and electrical utility storage rooms, all of which are controlled by and pre-existing within the resort's networks.

1.6 PLANNING ANALYSIS

Principal of development:

The proposal includes the placement of two extension onto the side walls of a pre-consented performance venue; the space shall not independently generate noise and because it will be attached to an existing structure its floor levels shall be matched and levelled to afford safe and convenient transition for all users. The structure shall be erected using an aluminium portalised frame matching the existing building which shall be seated on spreader plates and secured to the ground using helical ties. The walls and the roof shall match the host structure, in relation to materials and also in relation to colours, and doorset shall be inserted to ensure safe transition between the venue and the extended space also, to ensure that means of escape in case of fire from the performance venue is not compromised.

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The structure shall be compliant with Building Regulations, and this shall be demonstrated before the extended parts of the venue are first occupied. The structure shall sit on a gravel mat which was installed when the host venue was erected, and it shall be concealed from public spaces outside of the site entirely by the host building.

Character and Appearance:

The extension structure shall be coloured to match the host structure and shall utilise all existing materials for walls, roof, and doors so that it appears to be an originally constructed part of the building. The structure shall be serviced by relevant utilities using underground duct and pipework's with services taken from the existing site networks. The structure shall be clad using a Kingspan Fixed panel System in grey tones and shall include a roof using white PVC fabric secured across aluminium rafters. The structures shall match the existing building exactly.

Amenity:

The building, including the extensions will continue to sit within a mature holiday resort and shall be used solely for the purposes of affording facilities for dressing and wardrobe, bar servery, male & toilets including equality facilities, and storage purposes associated with the studio 36 venue.

The proposal will reduce necessity for team and guests to travel long un-covered distances from elsewhere on the resort, to reach essential servicing spaces. This will reduce the visibility of the performance from the audience before and after the performance on stage. Storage facilities for the back of house team, particularly the stage and productions crew will serve to reduce the operational clutter apparent in 'back of house' areas, which result in obstructions and hazards. All such concerns shall be fully averted by the implementation of the proposed scheme.

Highway Safety and car parking:

The proposed extensions shall each be placed on existing MOT1 gravel surfaces adjoining an existing performance venue and shall not influence existing highway and parking arrangements within the held title. The implementation of the proposed extensions shall provide essential supporting facilities for pre-existing team, and it shall not have cause to materially alter then number of persons accessing or travelling around the site, the proposal shall enhance the service operation and shall directly influence guest experience.

There shall be no change to the vehicle access positions on site, and there shall be no increase in the amount of accommodation provided or to the number of guests entering the site therefore, there shall be no increase in the traffic generation associated with the proposed development, the structure shall not be visible from the A52 Roman bank and there shall be no highway safety matters generated by the implementation of the proposal.

Flood risk:

The site is located within Flood Zone 3 behind existing mature functional sea defences, the resort communicates openly with the Environment Agency regarding matters of risk to the site as a whole in such manner as dictated by its lawful responsibilities, the applicants submission S/090/02215/20 included a Flooding Risk Assessment because it was a new development on open space within the resort, the works included below ground surcharge storage and run off attenuation to ensure that the existing network was not overloaded, the system is fully operational with no flooding events arising.

The proposal represents a Minor development (extension) in a less vulnerable use group (assembly and leisure) applied to a building licenced on a temporary basis, the development is considered to be acceptable from a flood risk vulnerability perspective as defined by the Environment Agency and will not increase the likelihood on the land or elsewhere because of its minor nature. The applicant has operated the premises for a period of 6 months, and they have determined that supplementary accommodation for the purpose proposed is essential for safe and efficient ongoing use as the resort moves into winter seasons, the applicant has trialled purpose use of adjoining buildings, and this has highlighted operational constraints which the proposed extensions will overcome.

The proposal will have a finished floor level matching the existing structure allowing level transition for operation and egress purposes, removing un-necessary hazards. The applicant will follow standing advise published by the environment agency, including placement of services above 1200mm minimising loss and enhancing efficient recovery. The placement will not have an adverse effect on any watercourse, floodplain or upon flood defences, it will not impede access to flood defence and management facilities and will not have a significant effect on any localised flood storage capacities.

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Lighting:

All new lighting provided for safe operation and use of the proposed spaces internally and externally, shall be LED lighting in accordance with the Bourne Leisure business model of reducing energy use across its brands. Internal lighting levels shall afford safe operation and use using LED fittings, and external lighting shall be limited to maintained LED bulkhead affording safe use of pavements and emergency lighting outside final exit points ensuring persons escaping may pass to a safe place away from the building.

Equalities Act 2010:

The proposal will include level access between existing premises and external open spaces, and this is considered to embody the protected characteristics of age, disability, pregnancy and maternity, race, religion or belief, sexual orientation, gender re-assignment, marriage, and civil partnership.

Human Rights Act:

The planning authority is minded to consider and take account for any implications which may arise from the Human Rights Act 1988, more specifically articles 1 and 8. The writer does not consider in this case that the proposal will unduly interfere with any local resident's rights and freedoms.

Assessment & Involvement – Conflicts & Resolution:

The information gathered by involving relevant stakeholders has provided clear advice on the acceptable form of development for the proposed site, and this is supported by historical consents already achieved on the site. The applicant has followed best practice in accordance with the Local Authorities guidance for Community Involvement.

Suitability & Density:

The proposed scheme provides a carefully thought-out theme to enhance an extant form of development operated successfully and without impact or injury on the site. The final proposal has been the culmination of positive preliminary discussions with the relevant consultees, including a Building Control Body and other parties responsible for control of development features. Adjustments to the layout of the premises shall see the implementation of new systems including LED lighting and electrical space heating.

Landscaping & Security:

External landscaping proposals are shown on the submitted drawings, the soft landscape shall continue to utilise species pre-evident on the site placed in such manner that would complement the existing installations, there shall be no new use of fencing or other physical construction above ground, the outside spaces around the studio 36 venue shall be retained open affording safe movement and circulation, also safe observation for personal safety and matters of crime and disorder. Guests and the resort team alike are encouraged to act safely and responsibly at all times, to ensure that only happy memories are made.

1.7 Policy Compliance

Planning Policy & Conditions

Section 38(6) Planning & Compulsory Purchase Act 2004, East Lindsey Local Plan 1999 (ELLP) adopted in 1995 and including saved polices 2007, and National Planning Policy framework including (but not restricted to) –

PPS4 - Sustainable Development
Policy T1 – Tourism Strategy
Policy A5 – Quality of Design and Development
Policy A4 – General Amenities
Policy T2 – Main Coastal Holiday Areas – South Coastal Area
PPS25 – Development in Flood Risk

East Midlands Regional Policies 009 Policy 35 Regional management of Flood Risk Policy 42 Regional Priorities for Tourism

<u>National Planning Policy Framework</u> Section 1 – Strong Competitive Economy Section 7 -Good Design Section 10 – Challenges of climate Change, flooding & coastal Change



The proposal falls within Flood Zone 3, which is an area with a high probability of flooding. The minor development proposed shall be confirmed as classified a Less Vulnerable form of development (assembly and leisure) given that they represent operational development at ground storey level with no sleeping, which is an appropriate use within Flood Zone 3 according to Table 3 of the Technical Guidance to the NPPF subject to the exception test being passed, as in this case where the non-residential development proposed is on a brownfield site. The applicant is signed up to the Environment Agencies Flood Line Warnings Direct service and maintains open lines of communication with the Environment Agency in regard to the ongoing matters associated with the operation of the site as a whole.

1.8 CONSULTATION

Pre-application Discussions:

The applicants planning consultant - Walsingham Planning, have carried out pre-application discussions with planning officers at the East Lindsey District Council, the writer and the planning consultants have also reviewed the ELLP 1999, EMRP and Saved Polices in detail, and they are content as *specialist professional consultants*, that the submitted proposal sit's well with the existing form and pattern of development within the resort and the character of the environment, in a manner which will not adversely affect the residential amenity of adjacent properties or guests of the resort. As such the applicant considers that their proposal as submitted, will comply with the published policies of the ELLP, the NPPF, CPA and T&CPA.

Community Engagement:

The writer has examined the environmental impact of the proposal and considers that no adjoining residential property owners within the immediate vicinity are likely to be affected. The applicant believes that the Ingoldmells Parish Council and Lindsey Marsh Drainage Board, in additional to Principal Consultants of the planning authority will have ample opportunity to comment within the context of the standard lawful public consultation process during the Local Planning Authority's formal consideration of the application.

No consultation has been made directly with the Town Council and/or any local elected Member of the Local Authority, due to the limited scope and relatively localised and insignificant impact of the works proposed. Proposals will of course, comply in their respective and applicable parts of the Building Regulations, the resorts Fire and Flood Risk Management plans as agreed and coordinated with the Environment Agency and the Devon & Somerset Fire & Rescue Service as the resorts Primary Fire Authority.

1.9 FLOODING SEQUENTIAL & EXCEPTION TEST

The site lies within Flood Zone 3 behind established and functional Sea Defences. As the proposed development is an extension to a pre-consented and pre-tested assembly and leisure structure, there is not a sequentially preferable or commercially viable alternative site or positions for this development to be located. It would not be in keeping with the function of the resort to locate the proposed accommodation off-site during periods of demand, and there is no difference in the flood rating of different areas of the site or around the site, meaning that no parts of the proposed development could be reasonably located in flood zone 1 as the whole of the site is located within flood zones 2 and 3, the proposal therefore passes the Sequential Test.

The proposal also passes the Exception Test because the development site is a Brownfield land parcel, Butlins plays a significant part in the socio-economic life of Skegness, and the proposal would serve to bolster the resorts maintenance of extant levels of employment. Accordingly, there are wider sustainability benefits to the community that outweigh flood risk. A Flood Risk Assessment (FRA) is included within this report below, and which confirms that the development will be safe for its users without increasing flood risk elsewhere. The extension shall be provided with toilet facilities for male and female performance team members and also of for guests, the drainage system shall be connected to an existing drainage network operating within the site and it shall not represent an increased load as the use of the space is equivalent to the use now ceased in adjoining buildings, because the same staff and guests will use the new accommodation offered by the proposed extension.

There shall be no increased loading.



2.0 ASSESSMENT OF FLOODING HAZARDS

2.1 Development Description and Location

The proposal is within Environment Agency flood risk zone 3 (high probability of Flooding from coastal breaches), and the works forming the basis for this submission will provide improved external amenity associated with an existing consented outside activity use and an existing building with established nature and floor level, within an establish holiday Resort. The premises sit within an assembly and leisure purpose groups and the works shall be categorised as water-compatible minor development according to the Environment Agencies published definitions.

The proposals presented within this submission should be considered as 'water compatible development' in accordance with D.2 PPG25 or otherwise using a pragmatic approach having regard to the scale and nature of the development proposal, as an adaptation to existing extant uses on the site involving no change to vulnerability categories or creating a greater risk to building users.

The site of the proposed play area is determined by the yellow arrow in the image below, the premises which would see adaptation may be noted to sit wholly within zone 3 because of level parameters and variations across the site.



Extract from Flood map for Planning at Gov.uk

2.2 Fluvial and Tidal Flooding

Whilst the site falls within flood zone 3, the proposed works are of limited nature involving materials and alterations which will not cause the existing consented buildings to be placed at a greater risk of fluvial or Tidal flooding. The assembly and leisure use category is a water-compatible use and standing advise of the EA will be followed.

2.3 Drains, Sewers, & Burst Water Mains

It is not considered that incidental flooding arising from drain, sewers, or water bursts will cause the works or existing buildings greater detriment after the works, than before.



2.4 Ground water flooding

It is not considered that incidental flooding arising from ground water will cause the works or existing buildings greater detriment after the works, than before.

2.5 Flooding from land

The Map extract provided below identifies the extent of flooding likely to arise from surface water flooding across the site, the play area, and the section of existing premises both forming the basis for this submission are identified by a red block, the reader will see that that this mapping is identifying no risk based upon historic records and events, and forward knowledge of the likelihood of events.

It is not considered that incidental flooding arising from land run-off will cause the works or existing building greater detriment after the works, than before.





🛑 <u>High</u> 🛑 <u>Medium</u> 🛑 <u>Low</u> 🔿 <u>Very low</u> 🔶 Location you selected

2.6 Flooding from other sources

It is not considered that incidental flooding arising from other sources will cause the works or existing building greater detriment after the works, than before.

3.0 CONCLUSION

It is considered that the development proposed by this submission can be accommodated satisfactorily without causing visual harm to the local visual or economic character of the setting. All relevant details required in terms of materials layout, design, scale, and landscaping are hereby submitted for full approval. The scheme is considered to sit well with the existing form and pattern of development within the resort and the character of the environment, in a manner which will not adversely affect the residential amenity of adjacent properties or guests of the resort.



4.0 PHOTOGRAPHS OF EXISTING PREMISES AND EXISTING EXTERIOR SPACE



4.1 Existing Northeast corner of Studio 36, existing tunnel will be removed to make way for extensions



4.3 Existing east elevation of Studio 36

4.2 Existing north elevation of Studio 36 showing gravel pad on which extension will be placed



4.4 Existing east elevation of Studio 36

END OF REPORT