

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

Our ref: AN/2022/132934/02-L01
Your ref: S/090/00494/22
Date: 19 July 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 referring the revised Flood Risk Assessment (FRA), prepared by Martin Baker dated May 2022, which we have now reviewed.

We note that section 5.3 of the FRA states that "*the proposed development is classified as More Vulnerable since the proposed temporary building meets the description below: Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan*". However, it is our view that as the proposed pods will be occupied at the times of year when tidal flood risk is at its highest, together with the vulnerable nature of the pods (akin to that of a caravan), this proposal should be classified as 'highly vulnerable'. As such it is our view that when judged against the National Planning Policy Framework, this development is not appropriate within flood zone 3.

In addition to this, the submitted FRA does not adequately demonstrate how people will be kept safe from the identified flood hazards or consider how a range of flooding events (including extreme events) will affect people and property.

The FRA includes the Environment Agency's Hazard Mapping, however it does not utilise the information to assess the flood risk or demonstrate how people will be kept safe. 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% and a 0.1% chance of occurring in any one year for the present day scenario.

It is therefore our view that the only reliable mitigation in these circumstances is the use of a seasonable occupancy restriction to ensure such vulnerable structures would not be occupied during winter months when tidal flood risk is at its highest. The seasonal restriction we request aligns with that included in the East Lindsey Local Plan, Policy SP19(7).

Flood Warning and Evacuation Plan

We note that the application is supported by a flood warning and evacuation plan included within the FRA. We consider that warning and emergency response is fundamental to managing flood risk for this development.

The Environment Agency does not comment on or approve the adequacy of proposed flood emergency response procedures accompanying development proposals. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. The Planning Practice Guidance (PPG) (Flood Risk and Coastal Change section, paragraphs 056-058) provides information on producing an evacuation plan for development and the role of the local authority in ensuring these are appropriate.

In circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development. We recommend you consult with relevant Emergency Planners to determine whether the proposals are safe in accordance with the guiding principles of the PPG prior to determining this application. However, we would also draw your attention to the conclusions of the recent decision issued by the Secretary of State relating to extending the caravan open season at three sites (your refs: N/084/00587/20, N/110/00906/20 & S/090/00770/20) along the East Coast, i.e. that there is significant uncertainty about the effectiveness and reliability of FWEPs to manage flood risk during winter months.

Notwithstanding the above, we are mindful of other material considerations that will need to be balanced during the determination of this application, such as any 'fallback' position relating to existing permission for the site, which appears to permit camping and touring caravans without a seasonal occupancy restriction; as well as occupants already being resident on the site although they are being displaced from one area of the holiday park to another for a temporary period.

Accordingly, if the Council is minded to grant permission for this temporary use (and issue a time limited permission following which all pods will be removed from the site), we would not pursue our objection via the call-in procedure.

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

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