



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

Our ref: AN/2020/130892/01-L01
Your ref: S/090/01590/20
Date: 01 October 2020

Dear Chris

**Determination of whether or not prior approval is required for the siting and appearance of the proposed pole to the maximum height of 25m to be installed on a new pad foundation and associated works
Butlins Funcoast World, Roman Bank, Ingoldmells, Skegness, PE25 1NJ**

Thank you for referring the above application, which was received on 16 September 2020.

In the absence of a flood risk assessment (FRA), we request that your authority refuses prior approval.

The application site lies within Flood Zone 3 defined by the Environment Agency Flood Map as having a high probability of flooding. Paragraph 103, footnote 20 of the National Planning Policy Framework (NPPF) requires applicants for planning permission to submit an FRA when development is proposed in such locations.

An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development is unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of prior approval.

If your authority deems that the proposed development is 'essential infrastructure' which has to be located in a flood risk area for operational reasons and that needs to remain operational in times of flood, then an FRA must be submitted in support of the proposal to demonstrate that the proposal will remain operational during a 0.1% event (2115 scenario) and that appropriate mitigation measures/flood resilient construction techniques have been incorporated into the development. In this case we would expect water sensitive equipment to be placed a minimum height of 4.6m AODN (1.8m above ground level) in order to remain operational during a 0.1% event (2115 scenario).

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

Environment Agency
Nene House Pytchley Lodge Road, Kettering, Northamptonshire, NN15 6JQ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

Yours faithfully

Jennifer Moffatt
Sustainable Places Planning Adviser

Direct dial 02030 253488

Direct e-mail jennifer.moffatt@environment-agency.gov.uk