Site: Elreg House 58 Rosslyn Road Shoreham-by-Sea, West Sussex
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Approved by: Jason Morgans
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1.0 Discussion

1.1 This technical note has been prepared by Motion in response to WSP's statement dated 18th March 2025.

1.2 WSP's statement maintains their objection to the Flood Risk Assessment (FRA) and Flood Warning and Evacuation Plan (FWEP) produced in support of the proposed development at Elreg House, 58 Rosslyn Road, Shoreham-By-Sea.

1.3 Upon review of WSP's 18th March 2025 statement, they have not referenced Motion's technical note TN01 dated 4th February 2025 or discussed the information within it. TN01 provided a full review of the newly released Risk of Flooding from Surface Water (RoFSW) map (dated January 2025), and this review revealed that the new RoFSW map removed the areas and levels of flood risk that formed the basis of WSP's objection. Instead, WSP's 18th March statement continues to refer to the original FRA and the levels of flood risk exhibited in the old, now superseded RoFSW. It also extensively discusses paragraphs of the NPPF that, in the light of TN01 and the updated RoFSW, is no longer relevant. As such, WSP's 18th March 2025 statement and maintained objection is incorrect and based upon outdated flood risk information and refers to an FRA that has been advanced upon through the information provided in TN01.

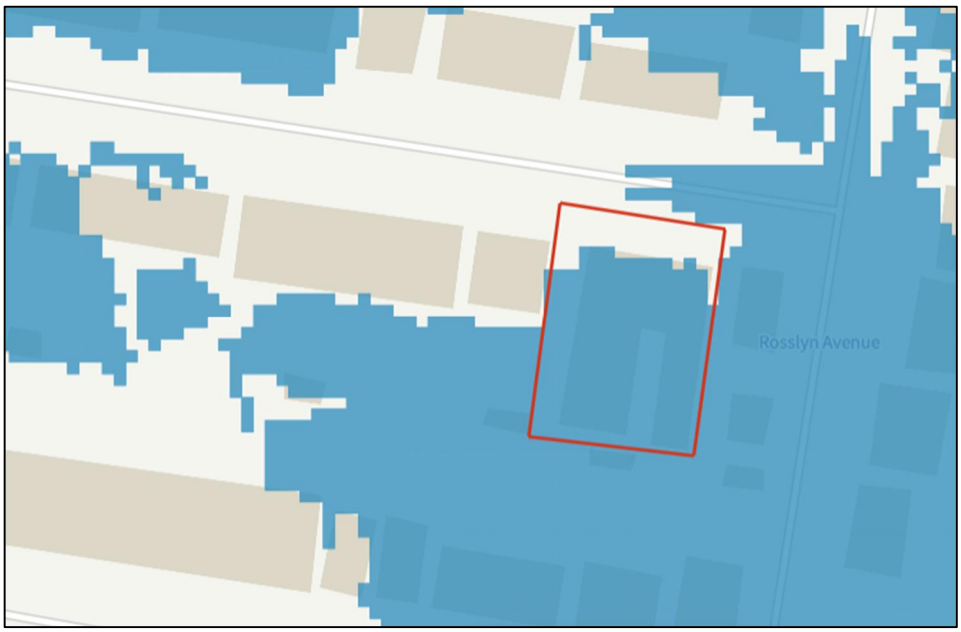
1.4 For ease of reference, this technical note will present the updated surface water flood risk information that WSP have failed to address. Figure 1.1, below, shows that the updated RoFSW provide Elreg house with clear unimpeded access to Rosslyn Road in the 1 in 100-year (design) surface water flood risk event.

Figure 1.1 – 1 in 100-year (design) surface water flood risk at Elreg House based upon updated January 2025 RoFSW map



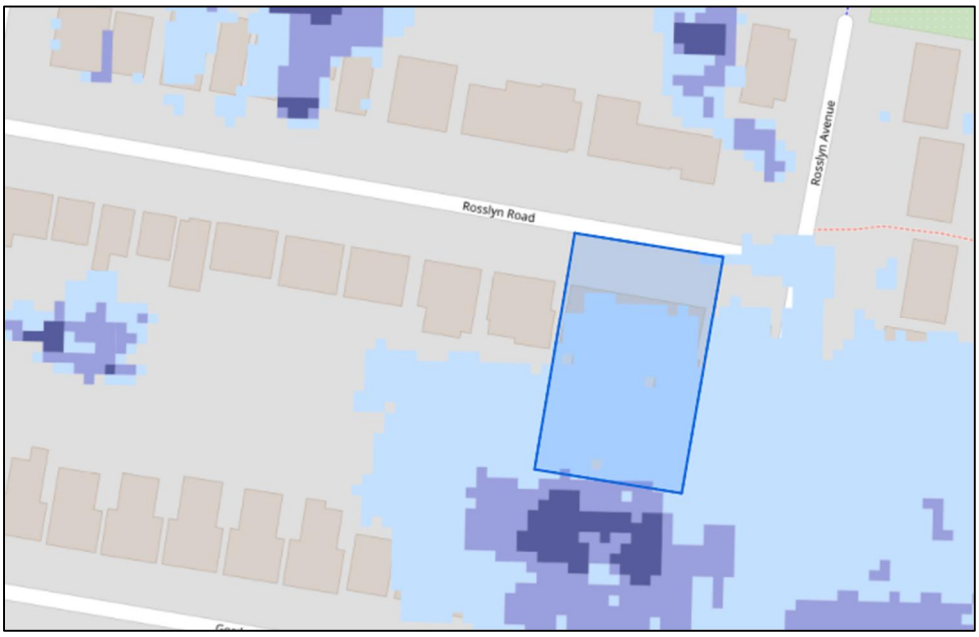
1.5 Advancing upon Figure 1.1, if the 1 in 1,000-year surface water outline is referenced, this also shows that Elreg house has clear unimpeded access to Rosslyn Road in the 1 in 1,000-year (low risk) surface water flood risk event. This is shown in Figure 1.2, below.

Figure 2.1 – 1 in 1,000-year (low risk) surface water flood risk at Elreg House based upon updated January 2025 RoFSW map



1.6 Finally, and to fully demonstrate that WSP's maintained objection is unfounded, the data behind the updated January 2025 RoFSW has been scrutinised for flood depths. Surface water flood depths of only 200mm or less are only present to the rear of Elreg House and this in the 1 in 1,000-year (low risk) flood event. There is no flooding to the front of the property, even in the 1 in 1,000-year surface water flood event. This is shown in Figure 1.3, below.

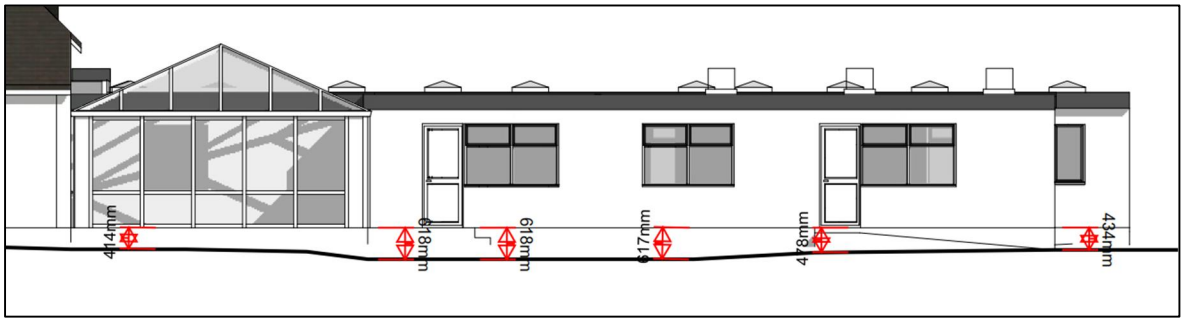
Figure 1.3 – Flood depths 200mm or less in the 1 in 1,000-year surface water flood event



1.7 With this in mind, there is clear demonstration of safe access and egress from Eleg House and, on this basis, we would ask the Planning Inspectorate to disregard WSP's 18th March 2025 statement, as it does not respond to the latest flood risk information prepared by the appellant, nor is it based upon the latest RoFSW mapping. Therefore, their maintained objection is incorrect and based upon superseded and outdated information.

1.8 A final point that should be covered is that the flood depths shown in Figure 1.3 are not sufficient to ingress to the property. Figure 2.1 shows that in the 1 in 1,000-year flood event, surface water flood depths to the rear of the property would be 200mm or less. The FRA discussed that the FFL's are approximately a minimum of 414mm above ground levels at the rear of the property. This is shown in the scaled measurements in Figure 1.4, below.

Figure 1.4 – FFL's elevation above ground levels to rear of Elreg House



1.9 We would also like to add that because WSP have not acknowledged the content within Motion's technical note TN01, or responded to the information therein, they have also not made an attempt to discuss the implications of Standard 38 of the National Minimum Standards for Care Homes for Older People.

1.10 WSP's objection is based upon the provision of safe access and egress routes. The updated RoFSW information discussed in TN01 has proven that this can be provided from Elreg House because the levels of surface water flood risk have been reduced around Elreg House in the updated modelling. However, Standard 38 of the National Minimum Standards for Care Homes for Older People adds another element to the discussion of safe access and egress, which must be taken into account.

1.11 To reiterate the information provided by Motion in TN01, Standard 38 of the National Minimum Standards for Care Homes for Older People requires the registered manager ensures so far as is reasonably practicable the health, safety and welfare of service users and staff. It also requires care homes to work with local authorities and emergency services to be prepared to take any appropriate action required to safeguard the home and its residents in an emergency event (fire, flooding, etc.)

1.12 With that in mind, WSP's objection suggests that vulnerable residents would have to make their own way, or be chaperoned by staff, through deep and hazardous floodwater. This clearly wouldn't be the case. Any evacuation would certainly involve the local authorities and qualified emergency responders from the emergency services. They would carefully manage the situation and not allow residents to be placed at risk.

1.13 Therefore, WSP's suggestion that care home residents would have to independently negotiate 30cm – 90cm flood depths and high flood hazards is incorrect. This is especially true because the flood depths and hazards put forward by WSP are inaccurate because the RoFSW mapping that has been presented in TN01 and above shows that there is no flooding to the front of Elreg House where safe access and egress would be achieved.

2.0 Summary

2.1 WSP's maintained objection and the information within their statement dated 18th March 2025 does not reference current information or the latest information provided by the appellant. The information provided by Motion in TN01 and this technical note, which advance upon the original Flood Risk Assessment and Flood Warning and Evacuation Plan, show that the updated RoFSW mapping place Elreg house and the route that would be used for access and egress is not at risk of flooding up to and including the 1 in 1,000-year event.

As such, safe (and dry) access and egress can be achieved and the basis for WSP's maintained objection is unfounded and should be disregarded in the appeal.