

**From:** John Slater Planning  
**Sent:** 03 November 2017 16:25  
**To:** Maximillian Meyer  
**Cc:** Cheryl Poole  
**Subject:** Re: For the attention of Mr Slater - Hodsons Mill Ltd  
**Importance:** High

Dear Mr Mayer

I refer to your email dated 1st November that was passed to me by Cheryl Poole.

In these matters I have to be guided by the advice of the Secretary of State that the development can be shown to be safe for the lifetime of the development and allowing for climatic changes. At the end of the day it is going to be for the LPA to be satisfied as to arrangements with the benefit of a site specific flood risk assessment when considering a planning application. My consideration is centred on whether it is appropriate for the plan to be allocating its largest residential allocation in an area of flood, when there are other sites which are not at risk which may be available. However I also am aware that the guidance does allow proposals in areas of high risk, where there are regeneration benefits but that is subject to the need for the development to remain safe.

Whilst we can be pre occupied by the question of the depth of water and the capability of emergency vehicles to proceed through it, ( and I note that the emails describe the depth of water being approximately 1m when your evidence was that it is likely to be 1.13m in the 1 in 100 year event - the difference may or may not be significant). However the missing information is what will be flood velocity along the path the emergency services are expected to use and whether it is likely to be route prone to debris etc. We do not, I believe, have that information.

You will recall that it was your proposal that the route from the north should be the site's evacuation route. I have to have regard to the fact that some residents may be less mobile and need to be evacuated as they may not be able to walk out under their own steam. I am also conscious that district nurses or other carers would need to be able to reach their clients who were not capable of being evacuated with their equipment and supplies.

It therefore seems to me that if a safe route which allow vehicles to evacuate all residents but particularly the less mobile from the development, without putting the lives of rescuers at risk, would be an inherently safer and more satisfactory solution than relying on specialist emergency vehicles venturing into deep flood water which is travelling at an unknown velocity, during an emergency situation.

I note that you say in the final paragraph you are still actively pursuing alternative vehicular access and I suggest that you continue with these efforts and let me know the outcome and I can then reach my conclusions and write my report with my recommendations without too much further delay.

I will also ask that Cheryl Poole ensures that this correspondence is copied to all parties at the hearing and put on the respective websites.

Kind regards  
John Slater BA(Hons) DMS MRTPI  
John Slater Planning Ltd

**From:** Maximillian Meyer  
**Sent:** 01 November 2017 13:22  
**To:** Cheryl Poole  
**Subject:** For the attention of Mr Slater - Hodsons Mill Ltd

Dear Mr Slater,

At the oral hearing of 28th September, you invited representatives of Hodsons Mill Ltd to provide you with confirmation, by the 30th November, that an alternative access would be available for Ambulances & Fire Service, during a worst case return storm event. It was made clear that without such assurance you expected it would be difficult to consider confirming the allocation of the Hodsons Mill site in the Neighbourhood Plan. This was based on an assumption that revised modelled flood levels of approximately 1m maximum on the access to Northbridge St. must inevitably prevent the proper provision of emergency cover, particularly by the Ambulance Service.

Our Project Manager, Mr Barwick, has since contacted the regional Ambulance body, SECAMB, to establish the specifications of the Resilience and Contingency team, responsible for preparedness in such situations, this would require an alternative access. In the course of our enquiries, it became clear that the Emergency Services considered they could gain access with at least part of their fleet (when flood levels at the entrance were at the 1m depth identified in Hodsons Mill's last submissions) under Multi-Agency Contingency Planning that would be in force during a storm event of that magnitude. The exact nature of the response would be a product of the triaging of actual calls upon the combined services at that time - but that would of course apply to cover County wide and not specifically to any requirements at Hodsons Mill.

The Fire Service confirm "front line" Appliances would not be able to access the site, as a direct consequence of ESFRS Operational guidance not to take an Appliance to a location where flooddepth is more than hub height. As a result Appliances are not fitted with high level intakes, and hence able to exploit their potential wading capability. In consequence, many occupied areas, not simply Hodsons Mill, would not be accessible to Appliances in a major flooding event, but no unacceptable risk consequence is identified in the relevant preparedness planning. Contingency & Resilience plans essentially assumes safe service will be maintained with a combination of more capable vehicles on fleet, different working methods and utilising other resources under Multi-Agency co-operation.

We are therefore inevitably only unable to deliver an entirely positive answer to your strategic spatial planning preference to prove Fire Service providers can access with **all** vehicles in every situation, simply because the Emergency Services own Statutory Contingency and Resilience Planning response is based on different procurement and operational solutions to deliver their Planned objectives of safe outcomes for Residents in extreme events.

I attach below the emails received from SECAMB (Regional Ambulance Authority) and East Sussex Fire & Rescue Service for your information.

Hodsons Mill are actively seeking to deliver satisfactory arrangements for an alternative vehicular access for Emergency Vehicles, as set out in the post hearing notes and have various options still open and being negotiated. However, in the light of Emergency Services confirming they can already gain access to a standard considered adequate for existing Emergency Planning, I would appreciate your guidance if the issue of alternative access remains a requirement and needs to be addressed further.

Yours Sincerely

Maximilian Meyer

SECAMB:

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Hi John

Thanks for speaking with me this morning.

As discussed, I can confirm that we have a range of vehicle capabilities that we could use during a flooding situation, which could cope with that depth of water. As you indicated, these would be deployed based on clinical and operational need of the given situation.

Clearly we would not be able to guarantee that every asset would be available all the time, however, they do would work alongside other organisation with similar assets to provide a response should it be required. This does help to mitigate the risks associated with this.

Apologies that I'm not able to comment on all your questions, however, I hope this information is useful.

Regards

**Steve Carpenter | Senior Contingency Planning & Resilience Manager | South East Coast Ambulance Service NHS Foundation Trust**

**From:** Chris Stamp  
**Sent:** 04 October 2017 17:37  
**To:** John S Barwick < **Cc:** Steve Carpenter; Walter Meyer; Maximillian Meyer; Sue Orchard  
**Subject:** RE: Ambulance access, Hodsons Mill, Northbridge St, Robertsbridge

Hi John,

Thanks you for your enquire and I will ask Steve by reply of this mail to provide the information you require

Please let me know if you need anything further.

Sue please place on the action list for Steve.

**Chris Stamp**  
**Resillience and Specialist Operations Manager**  
**South East Coast Ambulance Service NHS Foundation Trust**

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**From:** John S Barwick  
**Sent:** 03 October 2017 17:48  
**To:** Chris Stamp  
**Cc:** Steve Carpenter; Walter Meyer; Maximillian Meyer  
**Subject:** Ambulance access, Hodsons Mill, Northbridge St, Robertsbridge

Dear Mr Stamp,

Many thanks for speaking with me earlier at what must be a busy time.

As explained, I act for the owners of this site who are in the process of securing permission for approximately 98 residential units with some ancillary commercial uses. This site is identified in the draft Neighbourhood Plan by Robertsbridge and Salehurst Council as their preferred site for meeting identified housing need in the area. The site, in common with other areas of Robertsbridge, is on a flood plain subject to existing defences adequate for a 75 year return period storm.

In the event of a 100 year return period storm, with climate change surcharge, studies show these would overtop; resulting in the existing access road flooding to a design depth of approximately 1m. All of the proposed units have pedestrian escape routes that would remain dry in worst case scenarios and services are suitably

hardened, the issue is purely vehicular access. The access is a low point and once past that, substantial “dry” areas would be accessible to vehicles to park and load.

The Neighbourhood Plan is currently being considered by an Inspector. In the course of his recent hearing he expressed concern that Emergency Services, but most particularly the Ambulance Service, would not be able to drive onto site during a 100 year storm event. On the basis of that belief he has tasked Hodsons Mill Ltd to explore providing an alternative access across neighbouring fields and woodland on the higher ground to the north. Because this crosses predominantly agricultural land, skirts woodland and adjacent areas of outstanding natural beauty, and is intended for very infrequent use, any solution here is itself not without problems. We envisage an acceptable alternative can be provided in “grasscrete” or similar geotextile soil reinforcing system, adequate to support a standard Ambulance which I understand weighs about 5 tonne gross, but are not convinced of the actual need for this solution.

I have of course looked at SECAMB’s comprehensive Resilience and Contingency Plans and it seems clear that in the event of a 100 year event storm these would be adopted anyway and with that follows an assumption of the deployment of specialist vehicles on the SECAMB fleet and possible availability of additional specialist transport through the multi -agency co-operation envisaged in such circumstances. I was grateful for your confirmation SECAMB already has on fleet ambulance vehicles which can wade 1m or better.

As we discussed I am hoping to be able to reassure the Inspector that his concerns are unfounded and would be immensely grateful if you could;

a) Confirm that the Ambulance Service currently has vehicles capable of accessing the site when the entrance is flooded to a depth of 1m. If it is the case that in the event of there being a 100 year event storm Contingency Planning would already be in place and even greater logistic support for the service (albeit on a triage basis) can be fairly assumed, it would be helpful to reference that in your reply.

If in consequence you conclude that an alternative route is not required by the Service, and felt able to make such a statement, that would obviously help put the matter beyond doubt.

b) Should the Inspector insist on an alternative route, confirm a geotextile reinforced grass surface track, with a clear track width of 2.75m and rated for vehicles of 5 tonne or more, through to Northbridge Street (at a point closer to the A21), and with appropriate signage, would be acceptable in principle. Obviously if you feel an alternative access is required and have any specific preferences for materials and/or design please let me know.

Please feel free to call me should you need to discuss this further.

Yours Sincerely

John Barwick

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**ESFRS:**

Dear Mr Barwick

Firstly thank you for contacting ESFRS with your consultation with reference to the above proposed development.

In answer to your queries please see responses below.

**a) Confirm if ESFRS believes it has adequate capability to access the site when the entrance is flooded to a depth of 1m.**

Although ESFRS do have certain vehicles as part of their fleet that could access the site through a 1m depth of flood water these are specialist appliances i.e. Landrovers and a Unimog. Our front line appliances that would be required to deal with a potential fire situation on the proposed development do not have this capability and therefore would not be able to pass through flood water to a depth of 1m.

**b) Should the Inspector insist on an alternative route, confirm a geotextile reinforced grass surface track, with a clear track width of 2.75m , through to Northbridge Street (at a point closer to the A21), and with appropriate signage, would be acceptable in principle. Obviously if you feel an alternative access is required and have any specific preferences for materials and/or design please let me know.**

**Can you also confirm the maximum all up weight we should allow for a fire tender if specifying a support system, and the minimum clear height required.**

Table 20 on page 111 of Approved Document B Vol 2 B5 of the Building Regulations 2010 outlines the access route specifications in relation to Fire Service access. They state that a pumping appliance requires

Minimum distance between kerbs = 3.7m

Minimum width of gateways = 3.1m

Minimum turning circle between kerbs = 16.8m

Minimum turning circle between walls = 19.2m

Minimum clearance height = 3.7m

Minimum carrying weight = 12.5 tonnes

However, appliance specifications vary greatly between Services and our standard paragraphs sent out in our access consultations state that we (ESFRS) would require ".....**The minimum carrying**

**capacities should be increased to 17 tonnes for pumping appliances and 20 tonnes for high reach appliances with 27 tonnes for bridges or similar structures”**

I hope this assists you. I would have to add that flood water of any depth over the current wading capacities of our appliances would restrict access to many areas of East Sussex should a 100 year return storm event occur. I would also suggest that the probability of a combination of two such events occurring simultaneously would be statistically highly unlikely and should be considered. Would this be reasonable to ask for these additional measure based on this reason alone? This is obviously and ultimately a decision for the examiner to make.

If I can be of any further assistance please do not hesitate to get in touch.

Kind regards

Dan

**Dan Channon**

Business Safety Hub Manager  
East Business Safety  
Bohemia Road Fire Station  
Hastings  
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