

Our Ref: 3175/MY/LT20251023

23rd October 2025



Ms Joanne Fisher  
Development Management  
Mid-Sussex District Council  
Oaklands Road  
Haywards Heath  
West Sussex, RH16 1SS

**Via Email:** [joanne.fisher@midsussex.gov.uk](mailto:joanne.fisher@midsussex.gov.uk)

Dear Ms Fisher,

**DEMOLITION OF EXISTING DWELLING AND THE ERECTION OF A CARE HOME (CLASS C2) AND ADDITIONAL CARE UNITS (CLASS C2): HIGHFIELDS, WEST HILL, EAST GRINSTEAD, RH19 4DL. MID-SUSSEX PLANNING REFERENCE: DM/24/3051. FURTHER DRAINAGE RESPONSE**

As you know, we act for Igloo Care Ltd and EQ Care Group in relation to their joint planning application for a care home and related development at Highfields, East Grinstead. We write further in relation to comments made by West Sussex LLFA in their 19<sup>th</sup> September 2025 consultation response.

To confirm, we have today requested that MSDC formally reconsults with the LLFA regarding the following:

1. Letter of Response (NJP Consulting Engineers) – 23<sup>rd</sup> October 2025
2. Advice Letter (Compass Geotechnical Consultants) – 6<sup>th</sup> October 2025
3. Surface Water Drainage Layout (11089-503P Revision B) – 17<sup>th</sup> October 2025
4. Updated Tree Survey and AIA (ARC Arboricultural) – 20<sup>th</sup> October 2025

We also request that you take the following representation into account in respect of drainage matters.

On 22<sup>nd</sup> June 2024, the Council resolved to grant planning permission for ostensibly the same development as now proposed. This was subject to a condition requiring the submission and approval of details of drainage (draft condition 5). This was imposed on the basis that new foul and surface water connections would be made to a combined sewer in West Hill, via the proposed access road. The Council's drainage officer explicitly supported this approach.

Our client's extensive evaluation of utilities mapping and on-site investigations confirms that no combined sewer exists and that the proposed connections would not have been deliverable. The nearest surface water asset is Manhole Ref: 0851, located approximately 100m further up West Hill, opposite the entrance to Brooklands Park. To confirm, Southern Water has given permission in principle for a connection to this asset and has also approved related flow rate (see enclosure (1) for further information).

Post attenuation, it is proposed to route surface pipes around the northern perimeter of the proposed care home and through the woodland embankment to West Hill. This is necessary to sustain gravity flow between the site and the identified asset. The LLFA has queried this, but only in terms of adequate protection to trees and drainage infrastructure, and to ensure adequate maintenance access in future.

In terms of the former, the pipe route sits outside of the RPA of adjacent trees but for a short northward leg, via the embankment, into West Hill; a distance of less than 20m. The updated drainage details include a cross-section showing the pipes encased in concrete and wrapped in root barrier for protection. The Tree Survey and AIA has also been updated, and now identifies an indicative pipe route through the embankment (to be verified on-site during construction), along with a methodology for the protection of trees and roots. The Council's tree officer has been approached in this regard.

A combination of planning conditions (i.e., requiring the submission and approval of all drainage details, and adherence to the submitted Tree Survey and AIA), will ensure the stated methodology is followed.

To confirm, all land within the embankment is within the control of the applicant and within the planning application boundary. That same land would be retained by the care home operator, ensuring unfettered maintenance access to the pipe route.

This leaves just the access road, which drains only 15% of the site area, and where a different approach is proposed in response to much of the road falling below the minimum level for gravity drainage.

Whilst the application site is generally considered inappropriate for infiltration drainage, there are indications that material at lower levels towards West Hill is more appropriate for drainage. Hence, a series of deep soakaways are proposed, collecting surface water from the section of road below the level where gravity drainage is possible. Information supplied by our client's geotechnical consultants indicates that soakaways are viable in this location.

Notwithstanding this, there may be exceedance flows (i.e., events where the soakaway capacity is exceeded). Our client's drainage engineer sought the permission of the highway authority to discharge this to existing stormwater drains located on West Hill; but this was refused. Therefore, as a matter of last resort, it is proposed to reverse pump any exceedance flows back up the access road, via a rising main, and into the principal gravity system. Guidance published by West Sussex County Council indicates this is acceptable where all other options have been exhausted, as is clearly the case here.

To be clear, the development is not reliant on pumping. Rather, this provides a bespoke failsafe should the soakaways be unable to manage the surface water demands of the access road. Justification for this approach is laid out in the revised drainage details and accompanying letter to the LLFA.

As you know, our client has been pressed into submitting extremely detailed proposals (which include the agreement of the drainage undertaker) where previously only very limited information was found acceptable, despite the access road being a detailed component of the preceding planning application. As a matter of consistency, no further submissions should be required and planning conditions are readily capable of ensuring the detailed design of the drainage system follows the principles established here.

The ultimate objective of the LLFA is to confirm that new development does not worsen flood risk elsewhere. We are conscious that the surface water drainage arrangement of the existing dwelling is entirely unmanaged (appears to discharge to the embankment and thence, onto West Hill itself). Whereas, our client's engineer has demonstrated a viable drainage strategy, which attenuates surface water to an **agreed** rate and directed to an **agreed** drainage asset.

The earlier Committee Report confirmed that the objective of Policy DP41 (flood risk and drainage) is to demonstrate that a development is "*safe across its lifetime and [does] not increase the risk of flooding elsewhere*". These policy hurdles have clearly been met, and we would be concerned if any additional issues raised by the LLFA were to cause further delay. Can you please confirm that you agree.

Your sincerely,



**Miles Young**  
**Director**



Encs.