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Caroline Grist
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14 June 2026

Dear Ms Grist,

Re: Objection to Planning Application DM/26/1315

Land West of Gatesmead, Wickham Way, Haywards Heath

Proposed 49 new homes together with open space and associated infrastructure

1. Summary

Save Wickham Fields objects to application DM/26/1315 on the grounds of surface water drainage and flood risk. This objection does not rest on assertion: it is drawn from the applicant's own submitted Flood Risk Assessment and Detailed Drainage Strategy, from the Environment Agency's published flood-risk data, and from the statutory consultee responses already on the planning register.

The substance of the objection is that **the application is not, on the current evidence, capable of being safely determined**. The applicant's own reports confirm that the site cannot drain by infiltration; the submitted drainage design is shown by the applicant's own calculations to fail in the design storm; the flood evidence relies on an out-of-date model that the Environment Agency itself has flagged; no Sequential Test against surface-water flooding has been provided; and the statutory sewerage undertaker has confirmed it cannot yet assess the proposed foul connection. We respectfully ask that the application be **refused, or alternatively deferred** until this evidence base is completed and independently verified by the Lead Local Flood Authority.

We would note at the outset that the strength of local concern on this issue is already evident on the register: of the representations submitted, a substantial number raise flooding, surface water and drainage directly, several from residents on the roads that already experience surface-water problems on this side of the town. We do not repeat that testimony here; this submission is intended to set out the technical and policy case that underpins it.

2. Site hydrology and the receiving watercourse

The application site falls from the railway line on its western boundary eastward across the fields. Surface water from the site drains, via the watercourse adjacent to public right of way HAH/47BCU at the northern edge of the site, into the **West Common Stream / Scrase Bridge Stream** system.

This is a material point of context that the assessment of the application must engage with: the receiving watercourse is an **Environment Agency Flood Alert Area** — reference **065WAF440, "Scrase Bridge Stream and West Common Stream at Haywards Heath and Lindfield."** The Environment Agency's published data records that this watercourse already places properties at flood risk downstream, including on Hickmans Lane, Blackthorns and Meadow Drive. The watercourse into which this development proposes to discharge its surface water is therefore one that **already floods, and is already monitored by the Environment Agency for that reason**.

The field presently functions as undeveloped grassland that absorbs and attenuates rainfall before it reaches that watercourse. The proposal removes that function across the developed area and replaces it with hard,

impermeable surfaces. The central question for the drainage assessment is therefore whether the proposed scheme can manage the resulting run-off without increasing flood risk elsewhere, as required by Policy DP42 and the NPPF. On the applicant's own evidence, it cannot be shown to do so.

3. The site cannot drain by infiltration — the scheme relies wholly on discharge

The applicant's Detailed Drainage Strategy reports the results of BRE 365 infiltration testing carried out on 17–18 July 2025. The conclusion is unequivocal and is the applicant's own:

"The test show that infiltration was not possible and therefore the use of infiltration-based SuDS features (e.g. soakaways, infiltration basins or permeable paving) is not feasible for this scheme."

The significance of this is that **none of the surface water can be returned to the ground**. Every additional volume generated by the development must instead be stored and then discharged to the watercourse. The scheme increases the impermeable area of the site by **+39.51%**, and proposes to control discharge at **10.1 litres per second** into the adjacent northern watercourse.

The development therefore concentrates and pipes run-off — which the undeveloped field currently absorbs across its whole area — into a single controlled discharge to a watercourse already designated by the Environment Agency as at flood risk. This is precisely the circumstance in which the adequacy of the attenuation design must be demonstrated beyond doubt. It has not been.

4. The submitted drainage design is not shown to work

The applicant's own hydraulic calculations do not demonstrate that the proposed drainage system performs adequately in the design storm. The Detailed Drainage Strategy states:

"The water rises in the pond to a depth of 1.377m during the 1 in 100 years + 45%cc storm event... The half drain down time in the calculations appears to fail in some of the porous paving."

A drainage system whose **half-drain-down time is acknowledged to fail** is, by definition, a system that does not empty quickly enough to be ready for a subsequent rainfall event — the realistic winter condition on a catchment that the applicant's own ground investigation confirms cannot infiltrate. This is an admission, in the applicant's own document, that the design does not reliably perform.

The long-term operation of the proposed SuDS features (the attenuation basin, controls and porous surfaces) is, further, dependent on continued maintenance by a private management company for the lifetime of the development. The application provides no mechanism that gives the Council confidence this maintenance will be delivered in perpetuity, and the consequences of its failure fall on third parties downstream.

5. The flood evidence is out of date and incomplete

Three deficiencies in the flood evidence base should be addressed before any determination:

- **The fluvial flood model is out of date.** The Flood Risk Assessment relies on a hydraulic model dated **2009**. The Environment Agency's own data, included in the applicant's appendices, carries an explicit warning that the climate-change allowances it contains are *"not up to date"* and that further assessment using current allowances is required. The Environment Agency's published climate-change allowances were revised in **May 2025**; an assessment that does not apply the current allowances cannot be relied upon to demonstrate flood resilience over the lifetime of the development.

- **No Sequential Test against surface-water flooding has been provided.** The NPPF (2024) requires the application of the Sequential Test against **all sources of flooding, including surface water**, not solely fluvial flood-zone status. The site's location in Flood Zone 1 addresses river flooding only; it does not address the surface-water run-off that this development generates, which is the principal flood-risk concern here.
- **The Lead Local Flood Authority has not concluded its assessment.** West Sussex County Council, as the statutory Lead Local Flood Authority, is the body charged with scrutinising the surface-water drainage strategy. Its substantive consultee response should be before the Council, and given full weight, before any decision is taken.

6. Foul drainage is unresolved — the statutory consultation is incomplete

The statutory sewerage undertaker has confirmed that it cannot presently assess the proposed foul drainage. In its consultee correspondence dated **10 June 2026**, Southern Water states that it is *"unable to locate"* the applicant's proposed point of connection on its mapping, and requests the manhole reference *"to allow me to progress this planning consultation."*

This is compounded by an internal contradiction in the applicant's own Detailed Drainage Strategy, which describes the foul rising main as discharging to a manhole *"adjacent to Gatesmead"* in one section and *"adjacent to Eastmans Field"* in another. The proposed foul connection is therefore neither verifiable by the statutory undertaker nor internally consistent within the applicant's own submission.

It cannot, in our submission, be appropriate to determine an application while the statutory sewerage undertaker remains unable — through the applicant's own omission — to assess a matter as fundamental as the foul drainage connection and the capacity of the receiving network.

7. Conflict with the development plan and national policy

For the reasons above, the application conflicts with:

- **Mid Sussex District Plan Policy DP41 (Sustainable Drainage Systems)** — which requires that development incorporate sustainable drainage and that surface-water run-off be managed so as not to increase flood risk. The applicant's own evidence shows infiltration is not possible and that the proposed system's drain-down fails in the design storm.
- **Mid Sussex District Plan Policy DP42 (Flood Risk and Drainage)** — which requires that development not increase flood risk elsewhere. Discharge of concentrated run-off into a watercourse already at recognised flood risk, on an out-of-date evidence base and without a surface-water Sequential Test, does not meet this requirement.
- **The National Planning Policy Framework (2024)** — in particular the requirements to apply the Sequential Test against all sources of flooding, to ensure development is safe for its lifetime taking account of current climate-change allowances, and to avoid increasing flood risk elsewhere.

8. Conclusion and requested action

The applicant's own reports establish that the site cannot drain by infiltration and that the proposed drainage design does not reliably perform in the design storm; the flood evidence relies on a model the Environment Agency has itself flagged as out of date; no surface-water Sequential Test has been provided; and the statutory sewerage undertaker cannot yet assess the foul connection. The receiving watercourse is one the Environment Agency already monitors for flood risk.

On this basis Save Wickham Fields respectfully requests that the Council:

- 1 Refuse** the application on flood-risk and drainage grounds; or, in the alternative,
- 2 Defer** determination until: (a) a surface-water drainage assessment is provided that demonstrates the design performs without failure; (b) the flood assessment is updated to the current (post-May 2025) Environment Agency climate-change allowances and a Sequential Test against surface-water flooding is undertaken; (c) the substantive consultee responses of the Lead Local Flood Authority (West Sussex County Council) and Southern Water are received and given full weight; and (d) the drainage evidence is independently verified.

We would be grateful if this objection could be reported to the Planning Committee, and ask to be notified of the decision.

Appendix — document references

All application documents are available on the Mid Sussex District Council planning register under reference DM/26/1315.

- **Detailed Drainage Strategy** (Ridge & Partners LLP) — infiltration test conclusion; +39.51% impermeable area; 10.1 l/s controlled discharge; 1.377m pond depth and half-drain-down failure; foul connection wording. (*Register, DM/26/1315 — Detailed Drainage Strategy, Parts 1 and 3.*)
- **Flood Risk Assessment** (Ridge & Partners LLP) — 2009 model reliance; Environment Agency climate-change "not up to date" correspondence. (*Register, DM/26/1315 — Flood Risk Assessment, Parts 1 and 2.*)
- **Southern Water consultee response**, dated 10 June 2026 — "unable to locate" the proposed point of connection. (*Register, DM/26/1315 — Consultation response, Southern Water.*)
- **Environment Agency Flood Alert Area 065WAF440** — "Scrase Bridge Stream and West Common Stream at Haywards Heath and Lindfield." (*check-for-flooding.service.gov.uk/target-area/065WAF440*)
- **Environment Agency, "Flood risk assessments: climate change allowances"** — revised May 2025. (*gov.uk/guidance/flood-risk-assessments-climate-change-allowances*)
- **Mid Sussex District Plan (2014–2031)** — Policies DP41 (Sustainable Drainage Systems) and DP42 (Flood Risk and Drainage).
- **West Sussex County Council** — Public Rights of Way (PROW HAH/47BCU); Lead Local Flood Authority.

Yours sincerely,

[REDACTED]
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