



WSCC CONSULTATION RESPONSE: County Planning – Minerals & Waste Planning Authority

TO:	Case Officer: Jason Hawkes
DATE:	25/09/2025
LOCATION:	Land West of Ifield, Charlwood Road, Ifield, West Sussex
SUBJECT:	DC/25/1312 Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.
RECOMMENDATION:	<input type="checkbox"/> Advice <input type="checkbox"/> More Information <input type="checkbox"/> Objection <input type="checkbox"/> Consulted in Error <input type="checkbox"/> No Objection <input checked="" type="checkbox"/> No Objection Subject to:

The application site comprises an area of 171.6ha to the west of Charlwood Road, Ifield, the entirety of which is located within the Brick Clay (Weald Clay) Mineral Safeguarding Area. Policy M9 (b) of the Joint Minerals Local Plan (2018, partial review 2021) states that proposals for non-mineral development within these areas will not be permitted unless:

- (i) "Mineral sterilisation will not occur; or
- (ii) *It is appropriate and practicable to extract the mineral prior to the development taking place, having regards to the other policies in this Plan; or*
- (iii) *the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible."*



The applicant has provided a Mineral Resource Assessment (MRA) as part of their application submission. The MRA confirms the presence of the safeguarded mineral resource across the site through the use of BGS geological survey data, and broadly concludes that the prior extraction of the mineral resource across the site would not be feasible owing to the size and location of the site; the abundance of the mineral resource across the county; potentially excessive costs associated with potential processing of the material on site in the event that prior extraction is attempted; the cost of geotechnical mitigation potentially required following extraction; the ecological/hydrological impacts on the site and on nearby sensitive receptors (noting BNG requirements and the retention of on-site habitat/ecology, which would prohibit large areas from extraction), and; the potential increase in bird hazard risk at nearby Gatwick Airport should mineral extraction occur.

It is understood that the application site is not allocated for housing development within the current iteration of the Local Plan (Horsham District Planning Framework 2015), however, the site has been considered as part of the emerging Horsham District Local Plan 2023 – 2040 under Strategic Policy HA2 (Land West of Ifield). The emerging plan recognises the importance of delivering new housing scheme without the unnecessary sterilisation of mineral resources.

The submitted MRA makes clear that the proposed development would not be suitable for the extraction of the mineral resource prior to the development taking place, owing to the constraints outlined above. That said, the sterilisation of the mineral resource will inevitably occur should the land be developed, as proposed.

Broadly speaking, the MWPA is satisfied with the submitted MRA in that, while the development as proposed would result in the sterilisation of a significant, albeit undetermined, amount of Weald Clay, the abundance of the mineral resource throughout the county and current permitted reserves at brick works across the county (as identified within the most recent 2023-2024 AMR) suggests that the priority of the safeguarded resource at this stage is considered to be 'low'. Further, when combined with the irregular site layout and on-site constraints to mineral extraction, it is appreciated that full prior extraction would likely disrupt the feasibility of the non-mineral development to a significant degree.

Therefore, the MWPA would offer No Objection to the proposed development from a mineral safeguarding perspective, subject to the LPA being satisfied that there is an overriding need for the non-mineral development that would outweigh the safeguarded resource.

West Sussex Waste Local Plan (April 2014)

The decision maker should be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Kind regards,

Edward Anderson (Planner)

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