

**WSSC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority**

TO:	Horsham District Council Case Officer: Nicola Pettifer
DATE:	13/02/2025
LOCATION:	Land To The West of Ashington C of E School, Park Lane, Ashington, West Sussex
SUBJECT:	DC/24/0406 - Demolition of existing buildings and erection of 180 dwellings, all-weather sport pitch, sports pavilion and allotments; with associated access, landscaping, open space and infrastructure (amended plans)
RECOMMENDATION:	☒ Advice ☐ Objection ☐ Modification ☒ No Objection ☐ More Information ☐ Refusal

West Sussex Joint Minerals Local Plan, July 2018 (Partial review March 2021)

The site is within the identified brick clay Mineral Safeguarding Area. Policy M9 of the JMLP notes 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 submitted Mineral Resource Assessment (MRA) provides a comprehensive breakdown of the potential viability of the prior extraction of the underlying mineral resource at the site. The report evidences preliminary investigative techniques (including 5 boreholes and 15 trial pits) and, when accounting for buffer zones, identifies a potentially extractable surface area of some 36,500m² for brick clay across two areas underlying the site. It is noted that there is no volumetric assessment or figure provided on the total amount of mineral that would inevitably be sterilised should prior extraction not be undertaken at the site.

The report concludes that the prior extraction of these resources would neither be; economically practicable, owing to the material and transport costs associated with the backfill of the site as well as the relative abundance of the resource across the County, or; environmentally feasible, given the potential impacts of prior extraction and associated transport would impose upon nearby neighbouring amenity (including the Ashington C of E School) and landscape features, albeit the MRA provides little evidence to substantiate



the extent to which nearby residential properties would act as a constraint to temporary mineral extraction (e.g. compared to the construction of the residential development).

Notwithstanding the overriding need for the non-mineral development, to which the MRA suggests would outweigh the prior extraction of the safeguarded resource, this will ultimately be for the LPA to determine. The MWPA is broadly satisfied with the conclusions of the MRA and it is accepted that Weald Brick clay is abundant within the wider area. Given the limited extractable size/depth of the site for clay extraction, when accounting for environmental factors, the sites locality on the edge of the built-up-area, and acknowledging that some part of the site may constitute previously developed land, the safeguarding of the brick clay resource in this particular instance is considered a low priority.

Therefore, in accordance with Policy M9 (iii), it will be for the determining authority to establish whether there is an 'overriding' need for the development, sufficient to outweigh safeguarding of the mineral. On balance, provided a need for housing in this location can be adequately demonstrated, in this case the County Planning Authority would offer **no objection** to the proposals.

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).

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