WSCC CONSULTATION RESPONSE 2:
County Planning – Minerals & Waste Planning Authority

TO:	Horsham District Council Case Officer: Matthew Porter
DATE:	15/05/2025
LOCATION:	Old Clayton, Boarding Kennels, Storrington Road, Washington, West Sussex, RH20 4AG
SUBJECT:	| DISC/25/0050 | Approval of Details Reserved by Conditions 6 (mineral extraction) and 13 (contamination remediation) to approved application DC/23/0701 (Demolition and erection of 60-bed care home (Class C2) and 8 No. age restricted bungalows (Class C3) with associated access and works).
RECOMMENDATION:	☐ Advice ☐ Objection ☐ Modification ☑ No Objection ☐ More Information ☐ Refusal

The MWPA were consulted on the discharge of conditions application and had previously requested (MWPA response date 17/03/2025) that the applicant provide a more detailed assessment of the potential quantity of the underlying mineral resource (Folkstone Formation, soft sand) and provide further evidence to support the conclusions of the original report i.e. that the incidental extraction of the mineral resource alongside the non-mineral development would not be environmentally feasible or economically practicable.

For reference, condition 6 reads as follows:

6. Pre-Commencement Condition: Prior to the commencement of development, detailed ground investigations shall be undertaken to determine if the site is suitable for incidental mineral extraction of the safeguarded mineral resource. The results of these investigations should be submitted to and approved in writing by the Local Planning Authority. If it is determined that incidental mineral extraction within the site is practical, then a scheme to secure the incidental extraction of mineral resource shall also be submitted to be approved by the Local Planning Authority.

   Reason: The incidental extraction of the mineral is in accordance with Policy M9 of the West Sussex Joint Minerals Local Plan and the National Planning Policy Framework

The applicant has provided a revised report (Minerals Supporting Statement, prepared by Ground and Water Limited, dated 22 April 2025) which includes an assessment of the quantity of the underlying soft sand. This is estimated to be approximately 249,750m^3 across the 1.35ha site, beneath an approximate 20,250m^3 of overburden. It is noted that the quantity identified represents the full extent of the mineral resource underlying the

site down to a depth of ~20m and covers the entire site (including previously developed land).

The report also identifies environmental constraints across the site that would limit the full incidental extraction of the mineral resource, including sloping terrain and retaining walls along the northern and western site boundaries and proximal residential receptors to the north, south and west.

Further, the report concludes that there would be limited opportunities for incidental extraction given the proposed groundworks required to bring forward the non-mineral development would comprise piled foundations. While these would be to a depth of ~10m for the care home, the diameter of the pilings would not yield any economically significant quantities of the safeguarded resource (calculated at approximately 2.4m^3 per pile). Groundworks in relation to the bungalows are not expected to exceed a depth of ~1m-~1.5m and so would not encounter the safeguarded mineral resource.

Crucially, the report identifies that, where encountered, the limited quantities of sand of the Folkestone Formation extracted during foundation installation/excavation could be segregated and re-used on-site to increase the sustainability of the development.

At this stage, the MWPA is satisfied that the applicant has addressed the comments raised in our previous consultation response, and the understanding of the underlying mineral resource is better understood as a result. The applicant has suggested that some limited quantities of the safeguarded resource could be extracted alongside the landscaping/excavations/footings required to bring forward the development.

Therefore, the MWPA is satisfied that it has been demonstrated that the full prior extraction of the mineral resource from the site prior to the commencement of the development would not be environmentally feasible or economically practicable. Consideration toward the incidental extraction of soft sand, as required by the condition, has been demonstrated to be achievable, and would be ancillary to the development given the nominal quantities that are unlikely to be of any significant economic value.

In the interest of sustainable development, the MWPA would encourage the reuse of this mineral within the development, as suggested by the applicant in their Minerals Supporting Statement. Therefore, the MWPA would offer no objection to the discharge of this condition or deem it necessary to consider any further assessment of the incidental use of the resource.

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