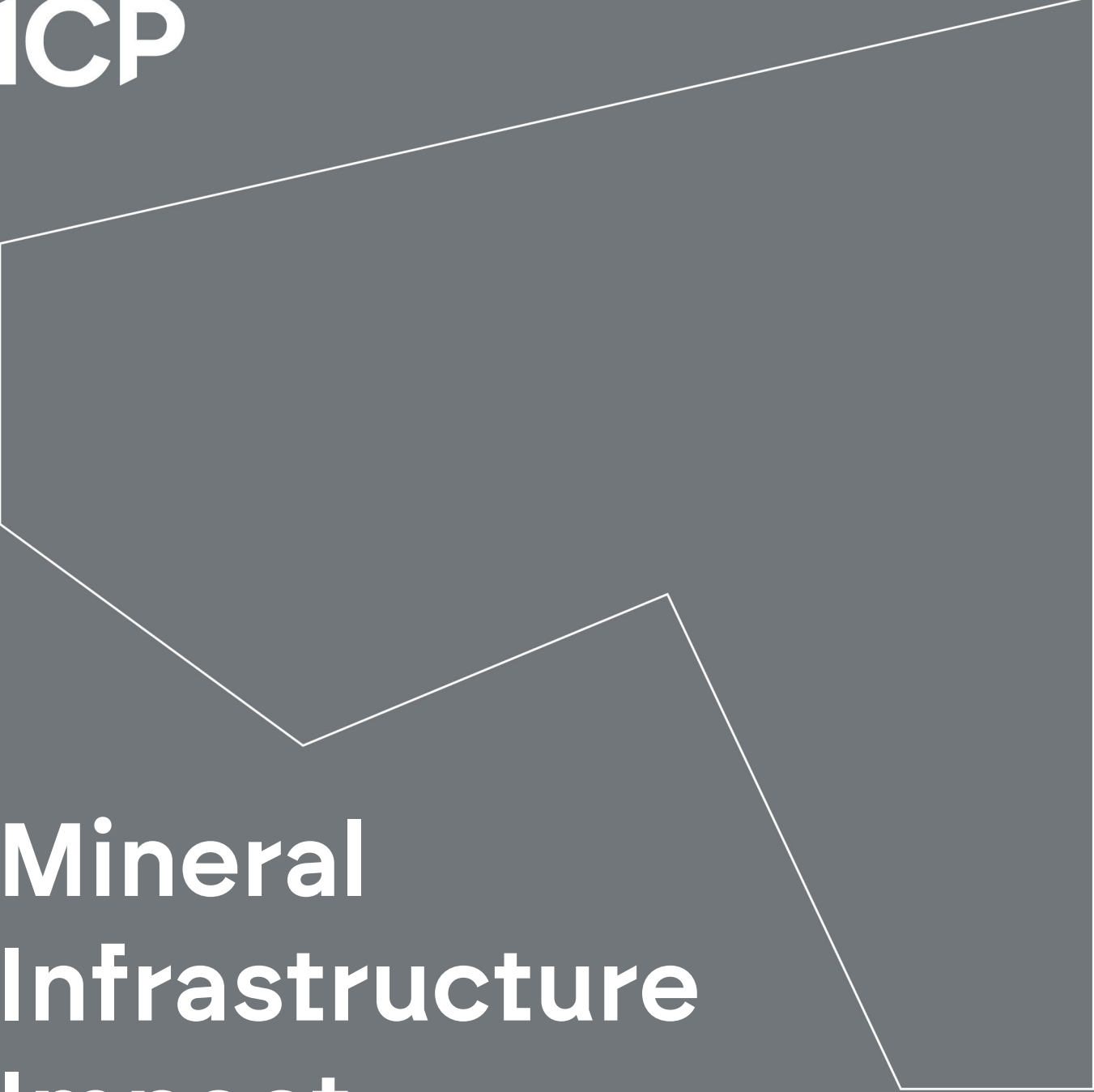




ICP

**Mineral
Infrastructure
Impact
Assessment**

**Land at North Horsham
(Mowbray)**

Document Control Sheet

Project Name: North Horsham MSA
Project Ref: 205
Report Title: Mineral Safeguarding Assessment
Date: July 2026

Originator	Checked	Version	Date Issued	Status
NP	ST	1	July 2026	Final

© IC Planning (IC Planning Ltd). All rights reserved. This document is expressly provided to and solely for the use of our client and must not be quoted from, referred to, used by or distributed to any other party without the prior consent of IC Planning who accept no liability of whatsoever nature for any use by any other party.

Contents

1 Introduction 5

2 Site Description..... 6

3 Minerals Planning Policy..... 9

4 The Mineral Resource 11

5 Minerals Assessment..... 13

6 Conclusion 17

Figures

Site Location Plan Figure 2.1

Wider Masterplan Figure 2.2

Appendices

Site Level Minerals Safeguarding Map Appendix A

Existing Mineral Extraction Constraints Plans Appendix B

1 Introduction

1.1 This Mineral Safeguarding Assessment ('MSA') has been prepared on behalf of Legal and General in support of a planning application made to Horsham District Council (as the Local Planning Authority ('the LPA')) for a mixed use development including offices and industrial/logistics ('the proposal') at Land at North Horsham ('the site').

1.2 The site is within a two-tiered authority area. As noted above, Horsham District Council are the LPA. West Sussex County Council are the upper-tier authority and the Mineral Planning Authority ('MPA').

Structure of this Report

1.3 This MSA will undertake an assessment of the mineral resource expected to lie beneath the site based on information obtained from the British Geological Survey ('BGS'), the West Sussex Joint Minerals Local Plan ('WSJMLP') and relevant background reports including the Local Aggregate Assessment ('LAA').

1.4 The remainder of this assessment is structured as follows:

- Section 2 – **Site Description** – Provides an overview of the site and surrounding area.
- Section 3 – **Planning Policy** - Outlines the relevant national and local planning policies, with particular reference to West Sussex County Council's approach to mineral safeguarding and prior extraction.
- Section 4 – **The Mineral Resource** - Describes the geological context of the site based on BGS mapping, identifies the type and extent of any mineral resources present, and considers their potential economic viability.
- Section 5 – **Assessment** - Evaluates the proposal against applicable policy requirements, including safeguarding criteria, and highlights site-specific constraints that would significantly limit the potential for mineral extraction, thereby reducing potential conflict with the proposal.
- Section 6 – **Conclusion** - Summarises the findings of this assessment and its findings.

2 Site Description

- 2.1 The site comprises a number of parcels of arable farmland and grassland. The site boundary for the planning application has several separate red line boundaries which excludes areas in between that are subject to a separate planning permission.
- 2.2 This is following the granting of outline planning permission for a large mixed use development¹ spanning a wider area to the west of the site which it is understood comprised several phases, many of which now have full planning permission and are under construction.
- 2.3 The site was part of this wider development but it is understood that the permission relating directly to this phase has lapsed. It is now the intention to reinstate this permission with the full planning application that is now presented to the LPA.
- 2.4 Consequently, whilst the surrounding area, particularly to the north, at present appears relatively rural, the aforementioned background context is important to note in terms of the assessment that will follow in this MSA.
- 2.5 The A264 runs by the site to the south, with the northern edge of Horsham beyond this. The nearest dwellings are approximately 150m-200m away in this direction. There are also several more isolated rural dwellings approximately 100m to the north of the northern part of the site.
- 2.6 Channel Brook runs directly passed the northern edge of the site. There is also a railway line which runs directly through the south western part of the site.
- 2.7 The Site Location Plan is provided in Figure 2.1 below. The wider masterplan from the aforementioned wider development to the west is provided in Figure 2.2 below for context.

¹ DC/16/1677 - Outline planning application with all matters reserved except access for a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m2), retail, community centre, leisure facilities, education facilities, public open space, landscaping and related infrastructure – Granted 01.03.2018

Figure 2.1 – Site Location Plan

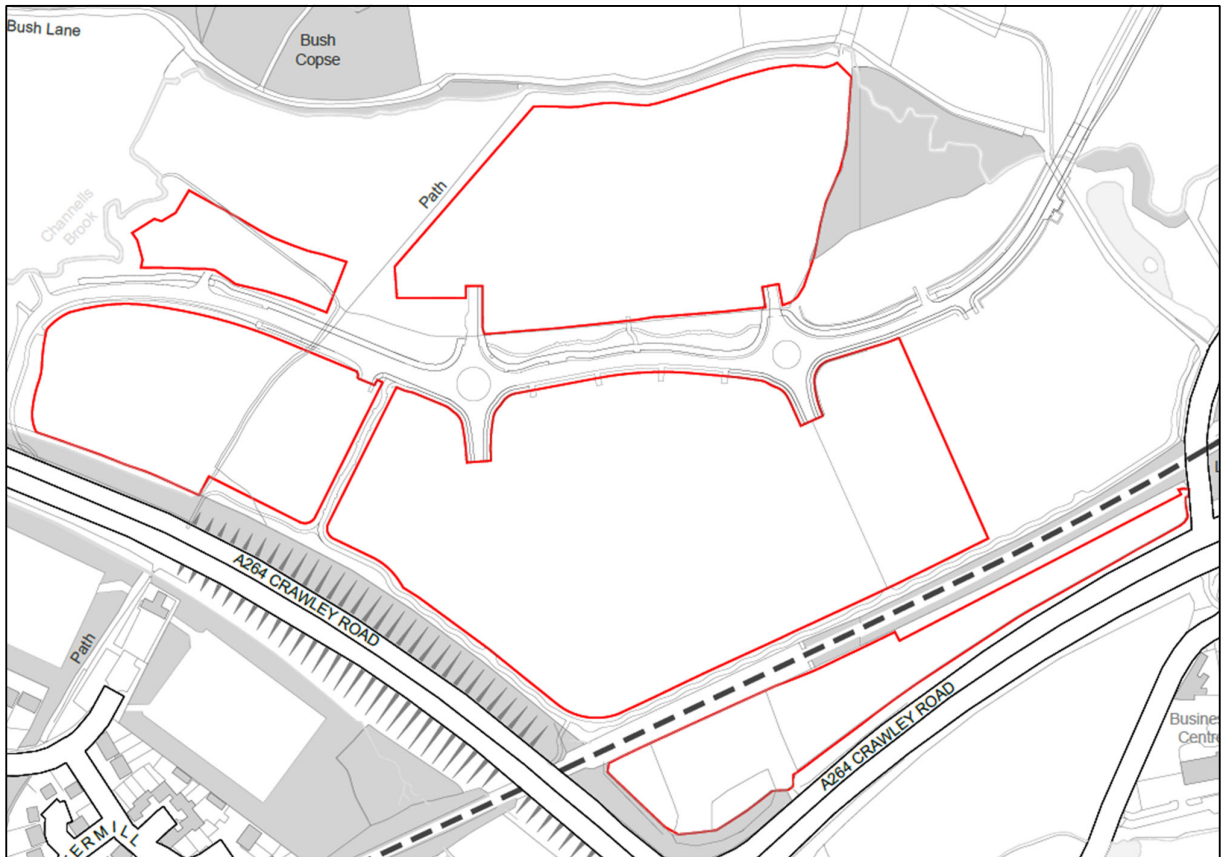
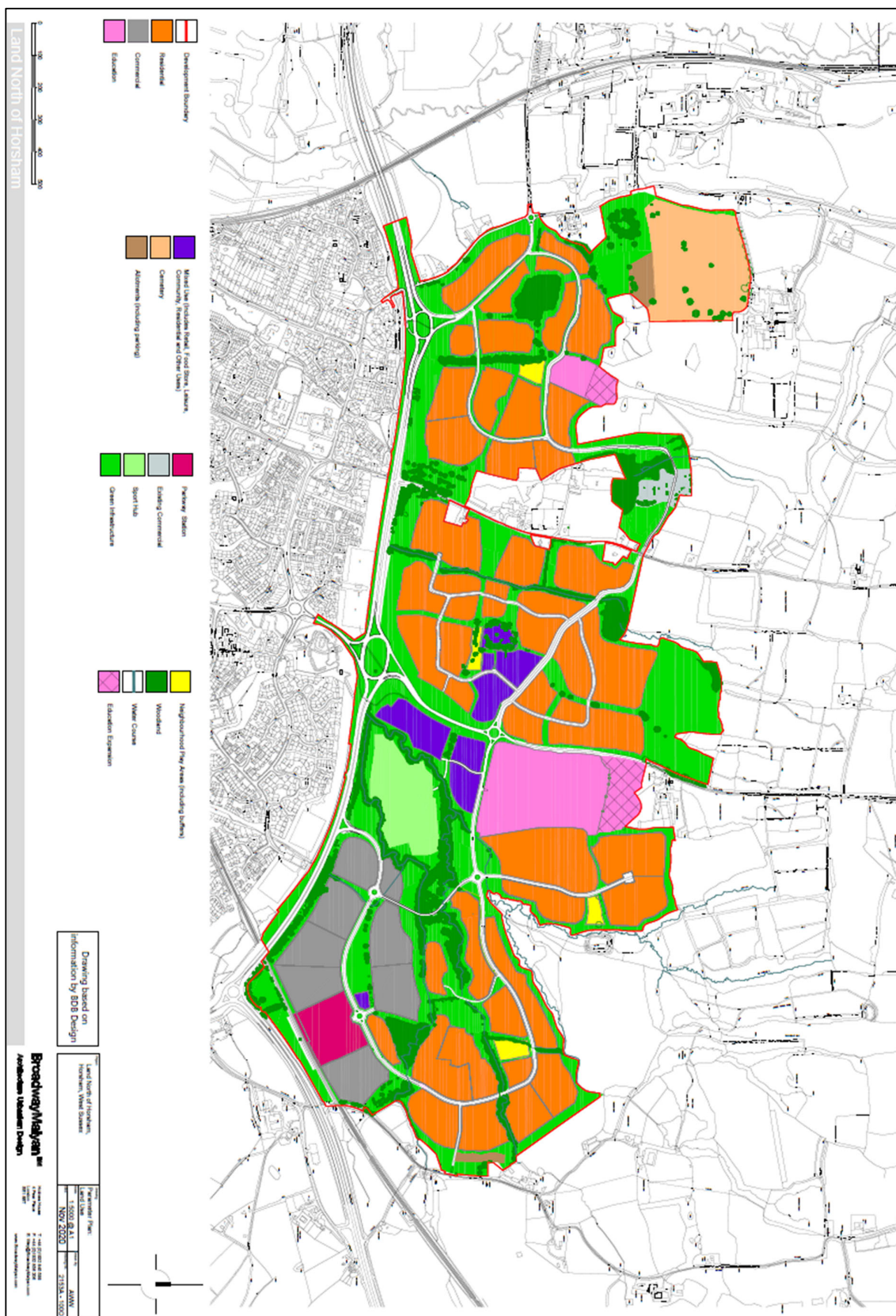


Figure 2.2 – Wider Masterplan



3 Minerals Planning Policy

- 3.1 The following section sets out the relevant national and local planning policies that are applicable to safeguarding mineral resources that are affected by the proposed scheme.

National Planning Policy Framework (NPPF) – December 2024

- 3.2 Chapter 17 of the NPPF, entitled “Facilitating the sustainable use of minerals”, provides several policy details covering a wide range of matters relating to mineral planning. These requirements are relevant not only to the determination of planning applications, but also to the preparation of local plans, minerals local plans, and other development plan documents. Paragraph 222 outlines the overall policy approach to mineral supply, recognising that mineral resources are finite and limited:

222. It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.

- 3.3 Following this overarching policy position statement, the NPPF then outlines the specific measures that mineral planning policies should cover in paragraph 223. These measures provide a framework for both day-to-day decision-making and the strategic preparation of plans, ensuring that mineral resources are identified, protected, and used responsibly over the plan period. In relation to the safeguarding of mineral resources, the following clarification is made in subsection c) of paragraph 223:

223(c). [Mineral Planning Authorities] safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked).

- 3.4 The prescribed approach to mineral safeguarding is further explained within paragraph 225, which states:

225. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

- 3.5 National planning policy is clear that any potentially viable mineral working should not be needlessly sterilised by permanent alternative development. These provisions apply both in plan preparation, where the spatial distribution of development must take account of mineral safeguarding, and in development management, where proposals are tested against safeguarding policies. The NPPF therefore sets out the broad principles against which local minerals policies must be framed, ensuring that long-term access to mineral resources is protected for future generations.

West Sussex Joint Minerals Local Plan (July 2018 & Updated March 2021)

- 3.6 West Sussex County Council have a joint Minerals Local Plan alongside the South Downs National Park Authority. This was adopted in July 2018 with formal revisions relating to a Soft Sand Review adopted in March 2021.
- 3.7 The WSJMLP seeks to safeguard mineral deposits in the county to ensure a sustainable supply. Policy M9 states (as material):

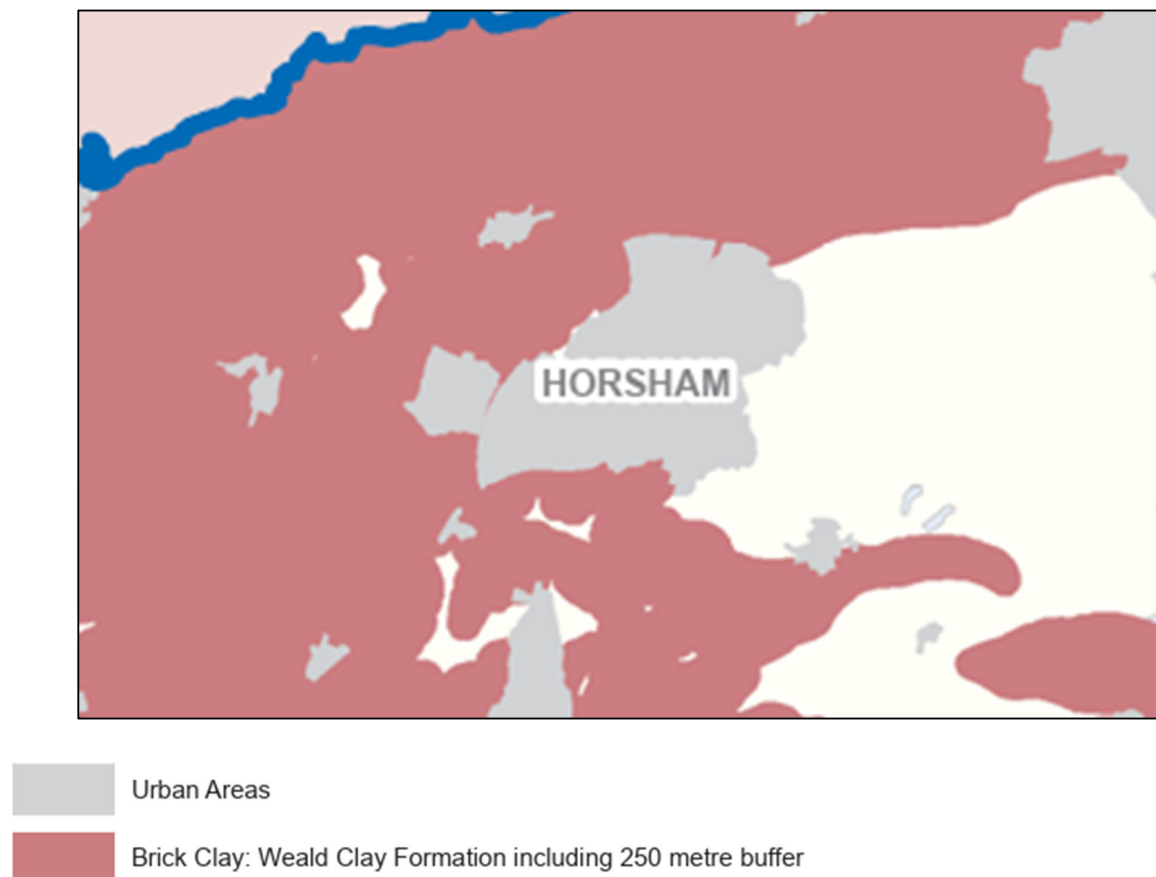
“Soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone resources and chalk reserves are safeguarded against sterilisation. Proposals for non-mineral development within the Minerals Safeguarded Areas (as shown on maps in Appendix E) will not be permitted 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.”*

4 The Mineral Resource

- 4.1 The WSJMLP is accompanied by a series of maps showing the safeguarded areas for each type of mineral deposit. These are produced at a county level, however, it is clear that the area surrounding Horsham to the north is entirely safeguarded for brick clay: weald clay formation. This high level map is reproduced at Figure 4.1 below. A site level plan is provided in Appendix 1 of this MSA.

Figure 4.1 – WSJMLP Brick Clay Resource Mineral Safeguarding Map



- 4.2 Brick clay and specifically the Weald Clay Formation is the most widespread resource across West Sussex with the majority of the northern half of the county safeguarded for this mineral.
- 4.3 The British Geological Survey² notes that Weald Clay Formation are “*Dark grey thinly-bedded mudstones (shales) and mudstones with subordinate siltstones, fine- to medium-grained sandstones,*

² <https://webapps.bgs.ac.uk/lexicon/lexicon.cfm?pub=WC>

including calcareous sandstone (e.g. Horsham Stone Member), shelly limestones (the so called "Paludina Limestones") and clay ironstones."

- 4.4 The WSJMLP is subject to monitoring with the latest Monitoring Report covering the 2023/24 period. This states that at the time of writing there were three active brickworks in the county, two of which have at least 25 years' worth of reserves. It goes on to outline that for the 10 year period up to 2023, the average brick clay reserve remaining on sites with planning permission was 15.9mt, with annual sales 0.31mt. It is therefore clear that the county has an ample supply of brick clay reserves at existing sites with planning permission.

5 Minerals Assessment

5.1 This section of the MSA assesses the existing site constraints by way of environmental factors and surrounding land uses to ascertain the possibility of prior extraction of the mineral resource beneath the site before the proposal is brought forward in line with the requirements of policy M9 of the WSJMLP.

5.2 Policy M9 allows for non-mineral development on safeguarded land in the event that *“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”*.

Existing Environmental Constraints

5.3 The following section of this report highlights features in and around the site that would represent a significant constraint to any potential mineral extraction. It is important to review the existing constraints so that the level of sterilisation which would be associated with the proposal can be fully understood.

5.4 Mineral extraction will result in impacts upon amenity (e.g. dust, noise, vibration and visual impact). As such, the degree to which the site is already effectively sterilised by existing receptors needs to be considered when establishing mineral sterilisation which would occur as a result of the proposal.

5.5 This section of the report is accompanied by drawing ICP/NH/003 which is included in Appendix B that has broadly highlighted the extent to which the mineral resources found on-site are already effectively sterilised. The following details and associated standoff distances from any possible mineral extraction scheme have been used:

- 250m from any residential property in all directions
- Any woodlands 15m and 10m from any hedgerows
- 20m from any roads
- 20m from stream
- 50m from the rail line
- 10m from any public rights of way

-
- 5.6 It is accepted that there are no statutory standoffs required for mineral developments. The above-mentioned distances are based on experience of the author's involvement with multiple mineral extraction sites nationwide.
- 5.7 In relation to the 250m distance from residential properties, this distance has been used as within that range it is more likely that the effects of noise, air quality and vibration will need to be significantly controlled and mitigated to avoid having unacceptable impacts.
- 5.8 The logic of using the 250m standoff distance is consistent with the approach outlined within West Sussex Councils Mineral Safeguarding guidance. The safeguarding guidance uses the 250m distance as a buffer zone around safeguarded minerals sites and infrastructure. Any non-minerals development that is proposed within this 250m buffer zone needs to be assessed to ensure that it will not introduce a new receptor, or receptors, that could impinge upon the operation of that site.
- 5.9 The SPD advises that unacceptable levels of dust, noise, lighting and vibration could be experienced by receptors within that 250m distance. This is used to ensure that new non-mineral related development brought forward within the 250m buffer zone does not result in any additional mitigation being placed upon minerals operators as they would introduce new sensitive receptors. This approach is consistent with the "agent of change" principle which is outlined in the NPPF.
- 5.10 A typical mineral extraction operation would involve a range of activities and infrastructure. These can include:
- Screening and sorting of extracted materials using elevated conveyors and hoppers;
 - Frequent movements of wheeled or tracked loading shovels;
 - Crushing of any oversized material (although this is generally not required at a sand and gravel quarry);
 - Washing of excavated minerals as part of the screening process;
 - Large-scale soil stripping and removal using tracked bulldozers and excavators;
 - Infilling of worked areas with imported materials to achieve required platform levels;
 - Frequent on-site haulage by articulated dump trucks;
 - Regular HGV movements to transport extracted minerals off-site and bring in infill materials; and

- The creation of large water treatment lagoons to manage and discharge surface or groundwater from the excavations.
- 5.11 These activities, with their associated noise, dust, vibration, traffic, and visual impacts, underline why a 250m standoff is considered necessary to protect sensitive receptors such as residential development.
- 5.12 It is accepted that residential receptors can be located within 250m of an active minerals operation and equally that there can be receptors beyond 250m that do experience unacceptable amenity impacts. For the purposes of this assessment, the 250m distance provides a robust indication of an acceptable proximity to a residential receptor.
- 5.13 The standoff distances noted for the hedgerows and woodlands are based on general working practices and would vary based on each section of vegetation. For the purposes of this assessment, the distance indicated on the plan is from the tree or hedgerow to any potential extraction. Ancillary mineral extraction features such as soil mounds, fencing and drainage channels would be accommodated within that distance.
- 5.14 The presence of the public highway can also constrain development. Excavation areas generally have to standoff from the public highway to ensure that the roads remain geotechnically stable and they do not present a risk to road users if a vehicle was to leave the carriageway. Typically, a 20m standoff from the public highway is observed.
- 5.15 ICP/NH/003 has mapped all of these existing constraints onto a plan for the site to provide an indication of the potential existing mineral sterilisation. There are existing dwellings within 250m to both the north and south of the site which would sterilise a lot of the mineral deposits within the site and make their extraction impractical.
- 5.16 Furthermore, as outlined above, there are also dwellings to be constructed as part of the wider masterplan for the large development that the site is effectively a part of which has planning permission that has begun to be implemented. The dwellings that will be to the north of the site will also be within 250m of most of the site which further makes their extraction impractical in the medium-long term once these dwellings are constructed.
- 5.17 In addition, the location of the railway which cuts through the south eastern part of the site and the A264 to the south of the site also would mean that large parts of the site are effectively sterilised and mineral extraction could not occur without a detrimental effect.

5.18 Finally, there are also treelines and hedgerows which traverse the site that would also in effect sterilise large parts of the site when the buffer outlined above is applied.

5.19 On the basis of the above, it is considered that there are considerable constraints that would make prior extraction of the mineral deposits within the site impractical or unfeasible. The very small amount of mineral deposits that are not sterilised would not be a viable amount to extract prior to the proposal taking place.

The Need for the Development

5.20 In addition to demonstrating that prior extraction is unfeasible, policy M9 of the WSJMLP also requires it to be demonstrated that the need for the development outweighs the safeguarding of the mineral within the site.

5.21 As outlined in Section 4 of this MSA, the reserves of brick clay within West Sussex are considerable and the latest Monitoring Report outlines that the county has an ample supply of brick clay reserves at existing sites with planning permission. Consequently, there is no requirement to safeguard the mineral deposits within the site in the context of the wider supply in the county.

5.22 In contrast, the proposal will provide invaluable employment generating development as part of a wider strategic allocation in the LPAs development plan. It is therefore clear that the LPA recognise the importance of the proposal as part of this wider allocation, which has also previously been granted planning permission, although it has partially lapsed.

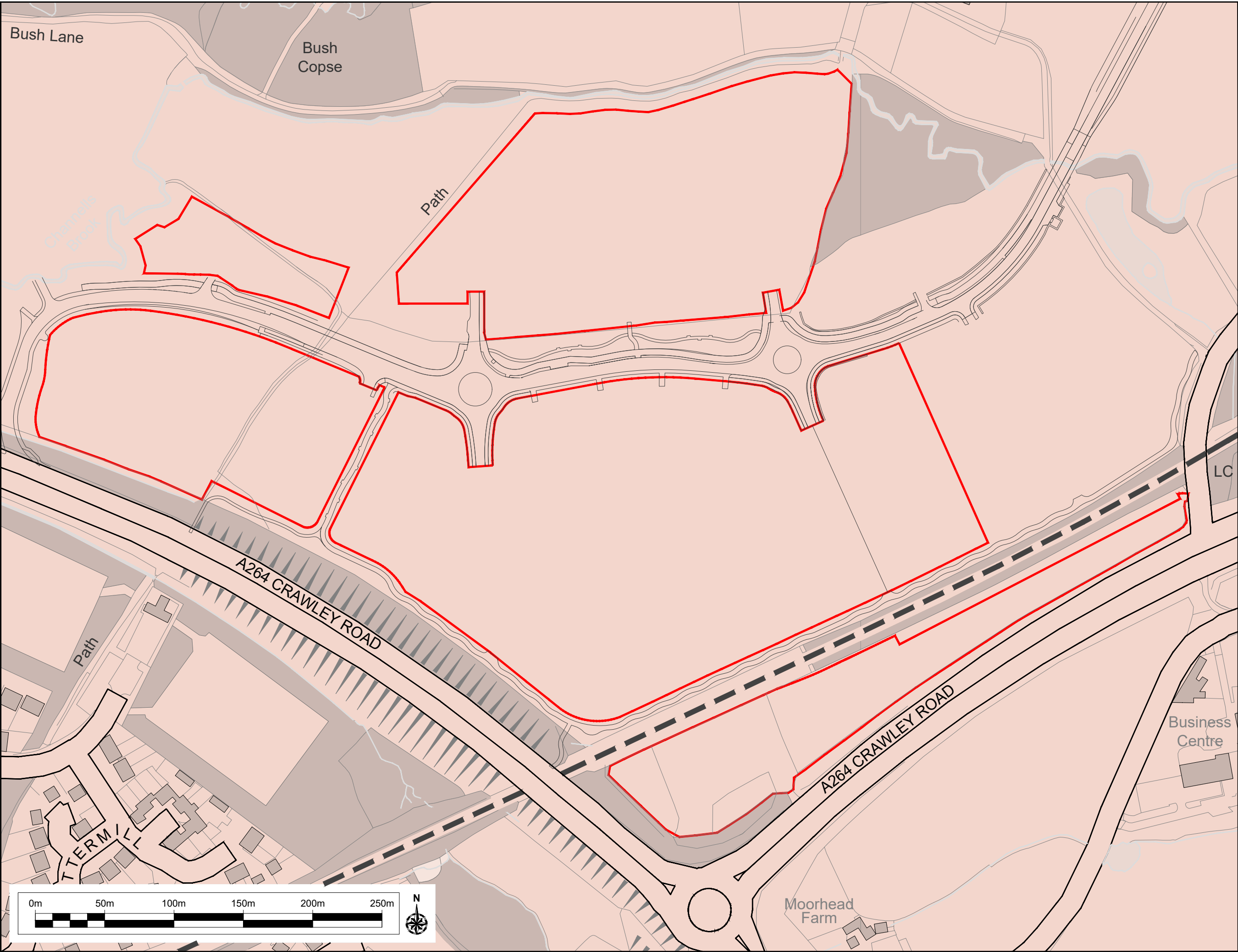
5.23 On this basis, it is considered that the need for the development demonstrably outweighs the need to safeguard the minerals within the site.

6 Conclusion

- 6.1 This Mineral Safeguarding Assessment accompanies an application for a development comprising a mixed use development including offices and industrial/logistics at Land at North Horsham.
- 6.2 The site is safeguarded for Brick Clay: Weald Clay Formation , which are the most widespread mineral resources in West Sussex with the latest Monitoring Report outlining that the county has an ample supply of brick clay reserves at existing sites with planning permission.
- 6.3 Existing site constraints have been assessed which demonstrates that the entirety of the site is already sterilised owing to the proximity of residential dwellings, transport infrastructure and landscaping.
- 6.4 Policy M9 of the WSJMLP allows for non-mineral development on safeguarded land when it has been demonstrated that prior extraction would be impractical and the need for the development outweighs the significance of safeguarding the mineral resource within the site.
- 6.5 Given the facts outlined above make it clear that there is no requirement to safeguard the minerals within the site in the context of the wider supply in West Sussex and that prior extraction would be impractical in any event, it is considered that the proposal is acceptable when assessed against policy M9 of the WSJMLP.
- 6.6 As a result, the mineral safeguarding designation should not preclude the proposal on this occasion.

Appendix A

Site Level Minerals Safeguarding Map



LEGEND

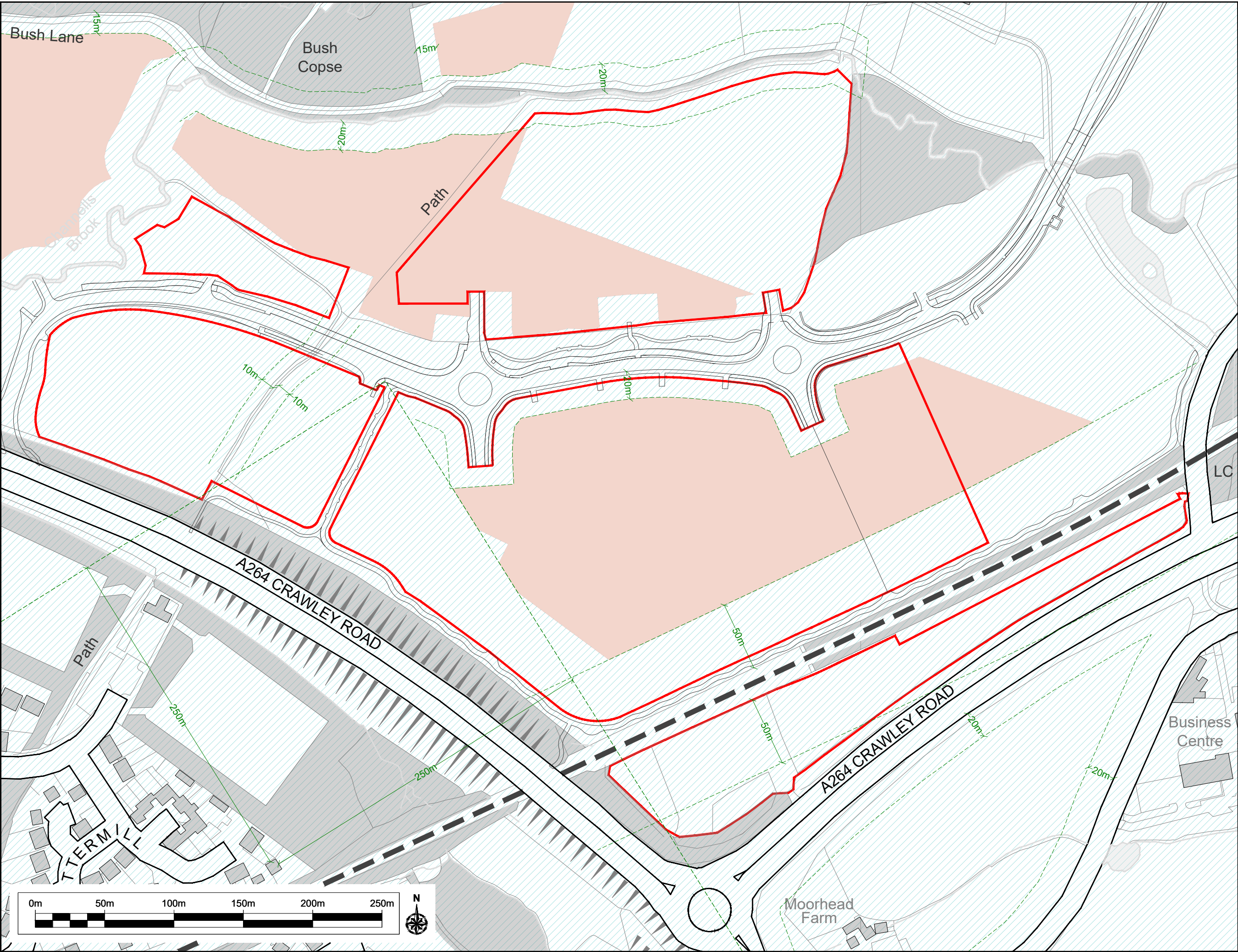

SITE BOUNDARY


BRICK CLAY

Rev	Date	Details	Chkd
IC Planning Ltd Portland House - Block D New Bridge Street West Newcastle upon Tyne NE1 8AL Tel: 01910548 0570  Delivering beyond boundaries Web: www.icplanning.co.uk			
Date	Scale	Drawn by	Checked by
17/07/2026	1:2500 @ A3	GTB	ST
Drawing Status WORKING DRAWING			
Project Title NORTH HORSHAM			
Drawing Title MINERAL SAFEGUARDING PLAN			
Drawing Number ICP/NH/002			Rev -

Appendix B

Existing Mineral Extraction Constraints Plans



LEGEND

- SITE BOUNDARY
- BRICK CLAY
- MINERALS SAFEGUARDING AREAS ALREADY STERILISED
- TYPICAL STERILISED STAND OFF

NOTE

MINERALS SAFEGUARDING AREAS ALREADY STERILISED BY EXISTING LANDSCAPE FEATURES

- 250m from any residential property in all directions
- Any woodlands 15m and 10m from any hedgerows
- 20m from any roads
- 20m from stream
- 50m from the rail line
- 10m from any public rights of way

Rev					Date	Details	Chkd			
IC Planning Ltd					Portland House - Block D	New Bridge Street West	Newcastle upon Tyne	NE1 8AL	Tel: 01910548 0570	Web: www.icplanning.co.uk
Date	Scale	Drawn by	Checked by	Approved by						
17/07/2026	1:2500 @ A3	GTB	ST	ST						
Drawing Status										
WORKING DRAWING										
Project Title										
NORTH HORSHAM										
Drawing Title										
EXISTING MINERAL EXTRACTION CONSTRAINTS PLAN										
Drawing Number										Rev
ICP/NH/003										-