

[REDACTED]

From: [REDACTED]
Sent: 27 June 2026 17:00
To: [REDACTED]
Cc: Nicola.Pettifer [REDACTED]
Subject: RE: Request for an Environmental Impact Assessment (EIA) Screening Direction, Horsham Application DC/26/0530

Dear Emma

I write to provide further evidence for consideration by the Secretary of State during the ongoing Environmental Impact Assessment (EIA) screening direction review relating to the proposed Hornbrook Farm residential development.

Subsequent investigation has established that the Hornbrook Farm site lies within a designated Brick Clay Mineral Safeguarding Area and is underlain by the Weald Clay Formation, a recognised and safeguarded source of brick-making clay.

This matter does not appear to have been addressed within the submitted planning application documentation.

National planning policy recognises that mineral resources are finite and can only be worked where they naturally occur. Accordingly, Policy M9 of the West Sussex Joint Minerals Local Plan safeguards important mineral resources from needless sterilisation by non-mineral development.

The purpose of safeguarding is to ensure that potentially valuable mineral resources are not permanently lost without proper assessment. Once permanent built development is constructed, any underlying mineral resource becomes effectively sterilised and inaccessible for future extraction.

Despite the site's confirmed safeguarded status, the application documents do not appear to include a Mineral Resource Assessment, a mineral safeguarding assessment, or any evaluation of the consequences of permanently sterilising the underlying brick clay resource. Nor does the documentation appear to consider whether prior extraction is practicable or whether the proposed development satisfies the tests set out within the statutory minerals planning framework.

The omission is significant. The proposal seeks permission for up to 180 dwellings together with associated infrastructure. If permitted, this development would permanently sterilise a safeguarded mineral resource across a substantial area of land.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The West Sussex Joint Minerals Local Plan forms part of that statutory Development Plan.

In the absence of any apparent assessment of mineral safeguarding issues, serious questions arise as to whether the proposal has been properly assessed against Policy M9 and whether the environmental baseline relied upon by the applicant can be regarded as complete.

This omission is directly relevant to the EIA screening determination. Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which requires consideration of the use of natural resources and the environmental sensitivity of the geographical area concerned.

A development proposal cannot adequately assess, mitigate or justify impacts upon a safeguarded mineral resource that has not first been identified and evaluated. The apparent omission of mineral safeguarding considerations therefore represents a material deficiency in the environmental baseline and creates a realistic possibility that significant environmental effects have not been properly identified or assessed.

I respectfully submit that this matter materially strengthens the case for a full Environmental Impact Assessment in order to establish a robust environmental baseline and to assess the likely significant effects arising from the permanent sterilisation of a safeguarded mineral resource.

I therefore request that the Secretary of State takes this additional evidence fully into account when determining the current EIA screening direction review.

Yours faithfully,



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