



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

TO:	Case Officer: Alice Johnson
DATE:	22/05/2026
LOCATION:	Land at Station Road, Warnham, West Sussex RH12 3SR
SUBJECT:	DC/26/0585 Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access
RECOMMENDATION:	☐Advice ☒Objection ☐No Objection ☒More Information ☐Consulted in Error ☐No Objection Subject to:

The application site is located close to Weinerberger Brickworks (some 80m to the north-east), and several established Waste Management Facilities, including an allocated waste site located on the Brookhurst Wood Site. It is also located within the mineral safeguarding areas for both brick clay and building stone.

The application should therefore be assessed against Policy W2 (safeguarded Waste Infrastructure) and Policy W10 of the WSSC Waste Local Plan (2014) ('WLP'), and Policies M9 (Safeguarding Minerals) and M10 (Safeguarded Minerals Infrastructure) of the WSSC Joint Minerals Local Plan (partial review 2021) ('JMLP').

Safeguarded Minerals Resources

Policy M9 (b) of the JMLP relates to the safeguarding of mineral resources.

The applicant has submitted a brief Mineral Safeguarding Statement (within the accompanying Planning Statement). It concludes the proposed development would accord with Policy M9 of the JMLP, stating that the need for housing would make an important contribution to Horsham's five-year housing land supply, and that the sites' location adjacent to a railway line, mature woodland, existing residential properties, and sensitive habitats, would render prior mineral extraction neither practicable nor environmentally or economically feasible. It is further noted that the site was 'formerly an earthworks' and 'the site has not been used for mineral extraction for some time'.

No qualitative or quantitative assessment of the underlying mineral resources (nor history for any previous 'earthworks/extraction') has been provided. Therefore, in the absence of evidence to the contrary, it is assumed that mineral sterilisation would occur.

However, in this case the MWPA note activities appear to have been taking place on the land for several years and the enclosed nature of the site (surrounded by woodland) results in a parcel of land of a limited area, proximate to residential/ecological receptors, and as such any substantive mineral extraction would unlikely be practicable or environmentally feasible in this location. Accordingly, subject to an overriding need for housing being established by the Local Planning Authority (LPA), the MWPA would not consider there to be any conflict with JMLP Policy M9.



Safeguarded Minerals and Waste Infrastructure

Minerals infrastructure

Policy M10 of the JMLP relates to the safeguarding of operational and allocated mineral infrastructure. It seeks to ensure development on, or near to, sites hosting permanent minerals infrastructure would not prevent or prejudice its operation. This is echoed by paragraph 200 of the NPPF which require the 'agent of change' to be considered.

Wienerberger Brickworks is safeguarded under Policy M10 as an operational minerals infrastructure site (brickworks). Whilst it is understood that the brickworks are within the ownership of the applicant, no specific assessment of the proposed development's potential to impact on the operation of this existing mineral infrastructure has been provided.

The MWPA therefore request a Mineral Infrastructure Statement (MIS) is provided (drawing upon evidence in supporting assessments, as necessary). In particular, the applicants attention is drawn to paragraph 3.4 of the Minerals and Waste [Safeguarding Guidance](#), which sets out key matters which must be addressed (i.e. to also include consideration of odour, light, dust and other emissions).

It is noted that the submitted Noise Impact Assessment has seemingly considered the potential noise impact of adjacent land uses upon future residents. However, the extent to which the conclusions have specifically considered the brickworks and associated infrastructure (e.g. conveyor belt) is unclear, further mitigation options may be required, and limited evidence of the efficacy of such mitigation have been provided. It is strongly recommended that the LPA seek the views of Environmental Health specialists on these matters.

In the absence of a MIS that demonstrates the proposed development would not prevent or prejudice the operation of safeguarded minerals infrastructure, the MWPA do not consider the applicant has demonstrated compliance with JMLP Policy M10.

Waste Sites

Policy W2 of the WLP relates to the Safeguarding of Waste Management Sites and seeks to ensure development on, or near to, sites hosting existing waste management sites, would not prevent or prejudice their operation. This is echoed by paragraph 200 of the NPPF which require the 'agent of change' to be considered.

The application site is located within close proximity to the Brookhurst Wood Site which contains several established waste uses, including the Brookhurst Wood Landfill Site and ancillary infrastructure/site offices/leachate and gas treatment (ref WSCC/002/24 – now in the final stages of restoration and subject to aftercare requirements); an Aggregate Treatment and Recycling Facility (ref WSCC/003/14/NH) a Mechanical and Biological Treatment Facility (MBT - ref WSCC/025/22); and a Waste Transfer Station (ref WSCC/006/18/NH).

In addition to the above established uses, extant planning permissions also exist for a Energy from Waste (EfW) facility on the site of the current Waste Transfer Station (ref WSCC/015/18/NH allowed on appeal 27 Feb 2020 ref APP/P3800/W/18/3218965 -



implemented through preliminary access and demolition works), and for a large area of hardstanding for the storage of Refuse Derived Fuel (RDF) and Compost Like Outputs (CLO) from the neighbouring MBT (ref WSCC/028/22 - unimplemented to date). For planning purposes, it must be assumed that these developments can come forward.

It is further noted that the parts of the site are allocated for waste uses by Policy W10 of the WLP, and which have yet to come forward. Such allocations are also safeguarded from development that would prejudice their future development by W10 (d) and thus warrant consideration.

The applicant has not provided a specific assessment of the potential impact of the proposal on the operation of existing and allocated waste sites. The MWPA therefore request a Waste Infrastructure Statement (WIS) is provided (accompanied by supporting assessments, as necessary) that considers the above identified waste sites. The applicant's attention is drawn to paragraph 3.4 of the Minerals and Waste [Safeguarding Guidance](#), which sets out key matters which must be addressed (i.e. to include consideration of noise, odour, light, dust and other emissions, evidence of engagement with neighbouring operators etc.).

It is noted that the submitted Noise Impact Assessment has seemingly considered the potential noise impact of adjacent land uses upon future residents. However, the extent to which the conclusions have specifically considered existing and future waste infrastructure is unclear. In particular, it is noted that the development would result in sensitive receptors closer to the future EfW facility. It is strongly recommended that the LPA seek the views of Environmental Health specialists on these matters.

Further comments

In addition to the above, the MWPA would also draw attention to the live planning application DC/25/0151 being considered by the LPA (to which the MWPA have provided detailed comments), which proposes residential development at similar distances to existing and proposed minerals and waste infrastructure, and which is supported by an MIS and noise, dust and odour assessment. It is recommended that these assessments are reviewed for consistency.

Conclusion

The proposed development has the potential to sterilise minerals, however, the extent of minerals affected would be limited, and any substantive prior extraction is considered unlikely practicable or environmentally feasible. Therefore, subject to an overriding need for housing being established by the Local Planning Authority (LPA), the proposal would accord with JMLP Policy M9.

As required by Policy W2 of the WLP, and Policy M10 of the JMLP, development must ensure that existing minerals infrastructure and waste management facilities/sites be safeguarded from inappropriate neighbouring development that could prejudice their operation. The applicant has not provided sufficient assessment of the potential impacts that the proposed development would have on the operation of existing proximate minerals infrastructure or waste sites.

Therefore, the MWPA request **further information** as follows;



- a Mineral Infrastructure Statement (MIS); and
- a Waste Infrastructure Statement (WIS)

all to take into account WSCC Minerals and Waste [Safeguarding Guidance](#).

Until such time as further information has been provided to address the matters addressed in detail above, the MWPA have a **holding objection**.

Please could the MWPA be reconsulted once the applicant has submitted this information.

Kind regards,

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