



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

TO:	Case Officer: Stuart Malcolm		
DATE:	10/11/2025		
LOCATION:	Land At Coombe Farm, London Road, Sayers Common, West Sussex		
SUBJECT:	DM/25/2661 Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.		
RECOMMENDATION:	<input type="checkbox"/> Advice	<input type="checkbox"/> More Information	
	<input type="checkbox"/> Objection	<input type="checkbox"/> Consulted in Error	
	<input type="checkbox"/> No Objection	<input checked="" type="checkbox"/> No Objection Subject to:	

Planning permission is sought for 210 dwellings around the land at Coombe Farm, between the A23 and B2118. The application site occupies a 13.4ha plot and is located entirely within the Brick Clay (Weald Clay) Mineral Safeguarding Area (MSA). Policy M9 (b) of the Joint Minerals Local Plan (2018, partial review 2021) states 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 applicant has not provided a specific Mineral Resource Assessment for the site or referred to Policy M9 (b). The submitted planning statement includes a brief note on the safeguarded mineral resource which acknowledges the presence of the mineral resource at the site, albeit no evidence of quality or quantity has been provided.

The note identifies the relative abundance of Brick Clay across the County and concludes that, irrespective of the market demand, the extraction of minerals from the site would be unacceptable in principle, owing to the proximity of the application site to nearby residential land-uses and the potential amenity impacts that would arise from the extraction process. No evidence has been provided to demonstrate how the temporary extraction of the mineral resource would impact nearby residential receptors beyond that caused by the temporary construction phase/permanent siting of the non-mineral development.



While the development as proposed would result in the sterilisation of a significant, albeit undetermined, amount of Weald Clay, the abundance of the mineral resource throughout the county and current permitted reserves at brick works across the county (as identified within the most recent 2023-2024 AMR) suggests that the priority of the safeguarded resource at this stage is considered to be 'low'.

It is noted that the site benefits from a draft allocation under DPSC5 (Draft Mid Sussex District Plan 2021-2039). Given the irregular site layout and on-site constraints to mineral extraction (including retention of important landscape features such as Coombe Wood to the west), it is likely that full prior extraction of the mineral resource in this location may prejudice the delivery of the non-mineral development, albeit this should be for the applicant to demonstrate as necessary and for the LPA consider within the planning balance when coming to a decision.

Therefore, the MWPA would offer No Objection to the proposed development from a mineral safeguarding perspective, subject to the LPA being satisfied that there is an overriding need for the non-mineral development that would outweigh the safeguarded resource and that it has been demonstrated that prior extraction is not practicable or environmentally feasible (Policy M9 b) iii)).

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).

Kind regards,

Edward Anderson (Planner)

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