

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

TO:	Case Officer: Rachel Richardson
DATE:	30/06/2025
LOCATION:	Land At Old Vicarage Field And The Old Estate Yard, Church Road, Turners Hill, West Sussex, RH10 4PA
SUBJECT:	DM/25/1467 Demolition of existing buildings and the development of 40 dwellings (including affordable housing) with open space, access, parking, drainage, landscaping and other associated works as well as the creation of a new community car park and replacement parking for Lion Lane residents.
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:

The application relates to the delivery up to 40 dwellings to the land to the north of Church Road, Turners Hill. The site layout is considered to be split with the main development area in the south and the "drainage area" comprising a narrow strip of land extending northward. The main development area is located within the identified Mineral Safeguarding Area (MSA) for Brick Clay (Weald Clay) and Building Stone (Ardingly Formation), with the northern "drainage area" strip being in the Building Stone MSA only. The entirety of the site exceeds 3ha and, accordingly, it is necessary to assess the proposal against Policy M9 (b) of the JMLP, which reads as follows:

WSSC Joint Minerals Local Plan (Partial Review March 2021)

Policy M9 (b)

(b) 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 MSAs (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.*

The applicant has provided a Mineral Resource Assessment (MRA) which considers the potential for the prior extraction of the safeguarded mineral resource. The MSA utilises proximal BGS borehole data, as well as on-site trial pits (9) and boreholes (2), to form an understanding of the underlying mineral resource within the main development area only.



The MRA identifies the Building Stone as “extremely weak to very weak” up to a depth in excess of 7.05m across the southern main development area. The assessment of the brick clay is sparse and only suggests that the resource is highly unlikely to be Wadhurst Clay. The northern strip of the application site has been omitted from any formal assessment and is therefore assumed to be similar to the resource underlying the main development area.

The MRA concludes that prior extraction of the safeguarded minerals from the site would not be viable, owing to the poor quality of the underlying resource, restricted site access and proximity to existing residential properties.

While lacking in any particular detail, the MWPA would broadly agree with the conclusions of the MRA, noting the inefficiencies of any potential extraction within the northern “drainage area” strip given this area of the site would retain natural landscape features and not result in the permanent sterilisation of any underlying mineral resource. The main development area is evidenced to yield low quality Building Stone (albeit details of these trial pits have not been provided within the MRA), and the small/irregular site area would be unlikely to yield any significant quantities the underlying Building Stone or Brick Clay (the extraction of the latter of which is considered to be of low priority).

As a result, the MWPA would offer No Objection to the proposed development, subject to the LPA being satisfied that there is an overriding need for the development that outweighs the safeguarding of the mineral resource, and that it has been demonstrated that prior extraction is not practicable or environmentally feasible.

Kind regards,

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