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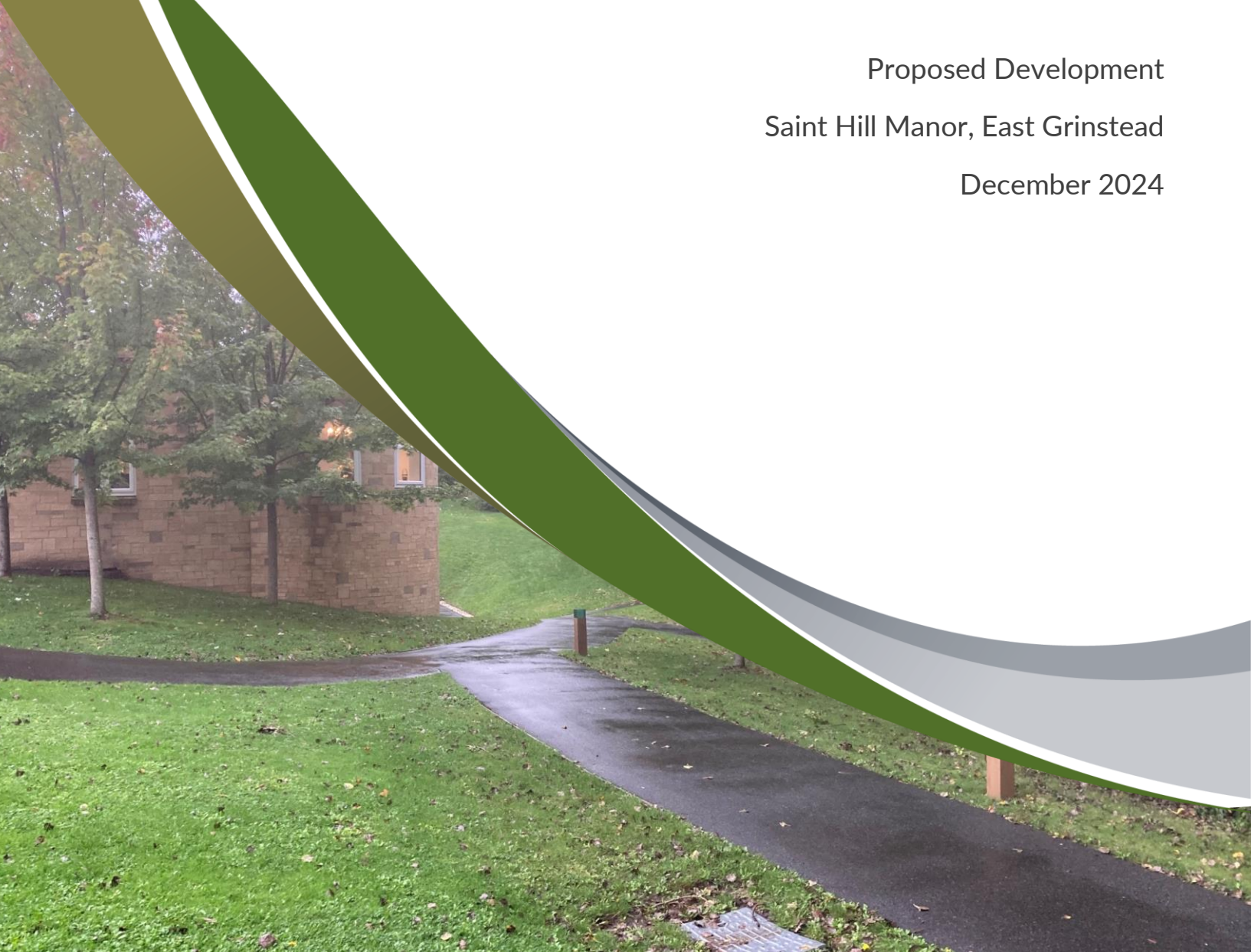
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Minerals Safeguarding Assessment

Proposed Development

Saint Hill Manor, East Grinstead

December 2024



Project Details

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Document history and status

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Appendix A Proposed Development Drawings

Limitations

Soiltechnics disclaims any responsibility to our Client and others in respect of any matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence in accordance with the terms of our contract, taking account of the resources, investigations and testing devoted to it by agreement with our Client. This report is confidential to our Client and Soiltechnics accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.



1 Overview

1.1 Brief

- 1.1.1 This report has been prepared following instructions received the Client, Carnegie Group.
- 1.1.2 The brief was to undertake a Minerals Safeguarding Assessment for the site to support the planning process for a proposed development.
- 1.1.3 This report is limited to the brief as set out above. A Ground Investigation Report has also been prepared for the scheme by Soiltechnics and was issued under reference STW6679-R01-Rev_B in December 2024.

1.2 Proposed Development

- 1.2.1 It is understood that the proposed development comprises several different aspects. They are summarised below.
 - Juhring Field – This field is located at the northern extent of the site and will comprise the construction of a permanent asphalt surfaced car park with a toilet block in the west and a new road providing access to an events field to the southwest.
 - Area 1 – This area comprises Hobbs Field which is used for events and was occupied by temporary tent structures at the time of investigation. It is understood that proposals include an access road and turning circle to connect the field with the proposed Juhring Field carpark to the north. A crane pad, washroom, substation and backup generator are also proposed to the southeast of the area.
 - Area 2 – This area consists of the existing castle buildings. There are two proposed extensions to the castle, one to the west and one to the north. The extensions are understood to include basements.
 - Area 3 – This area is located in the southeast of the site and proposed development includes two washrooms.
- 1.2.2 The report is based on the project proposals and information outlined above; should the scheme change then it will be necessary to review the conclusions and recommendations presented in this report. Drawings showing the proposed development areas are presented in Appendix A.
- 1.2.3 The two key areas of development most likely to affect mineral resources are the car park and the castle extensions. The small wash blocks and temporary crane base are minor in nature and not specifically considered, but are covered in the overarching conclusions.

1.3 Site Context

- 1.3.1 The site is Saint Hill Manor, an estate ~1.2km southwest of East Grinstead which lies within an Area of Outstanding Natural Beauty (AONB). The manor itself is Grade II listed but there are more modern buildings on the site such as the Castle which are not thought to be listed.
- 1.3.2 The site is accessed from Saint Hill Road which lies adjacent to the site's northeastern boundary. The nearest Lorry Route Network is ~4km to the north (A22) on the other side of East Grinstead.

2 Minerals Safeguarding

2.1 Legislative Framework

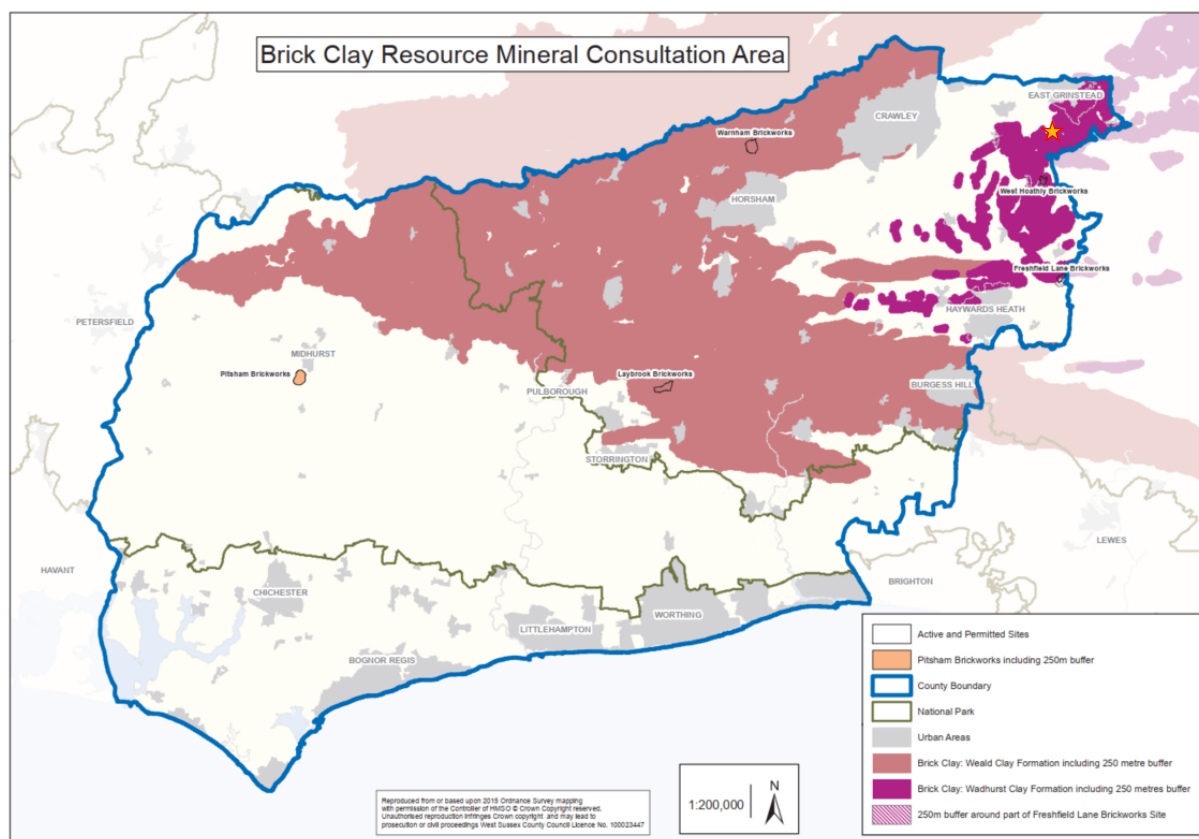
2.1.1 The West Sussex Joint Minerals Local Plan was published in 2018 and subject to a 5-year assessment in 2023. This document has been used alongside the Minerals and Waste Safeguarding Guidance (2020) to inform this Minerals Safeguarding Assessment.

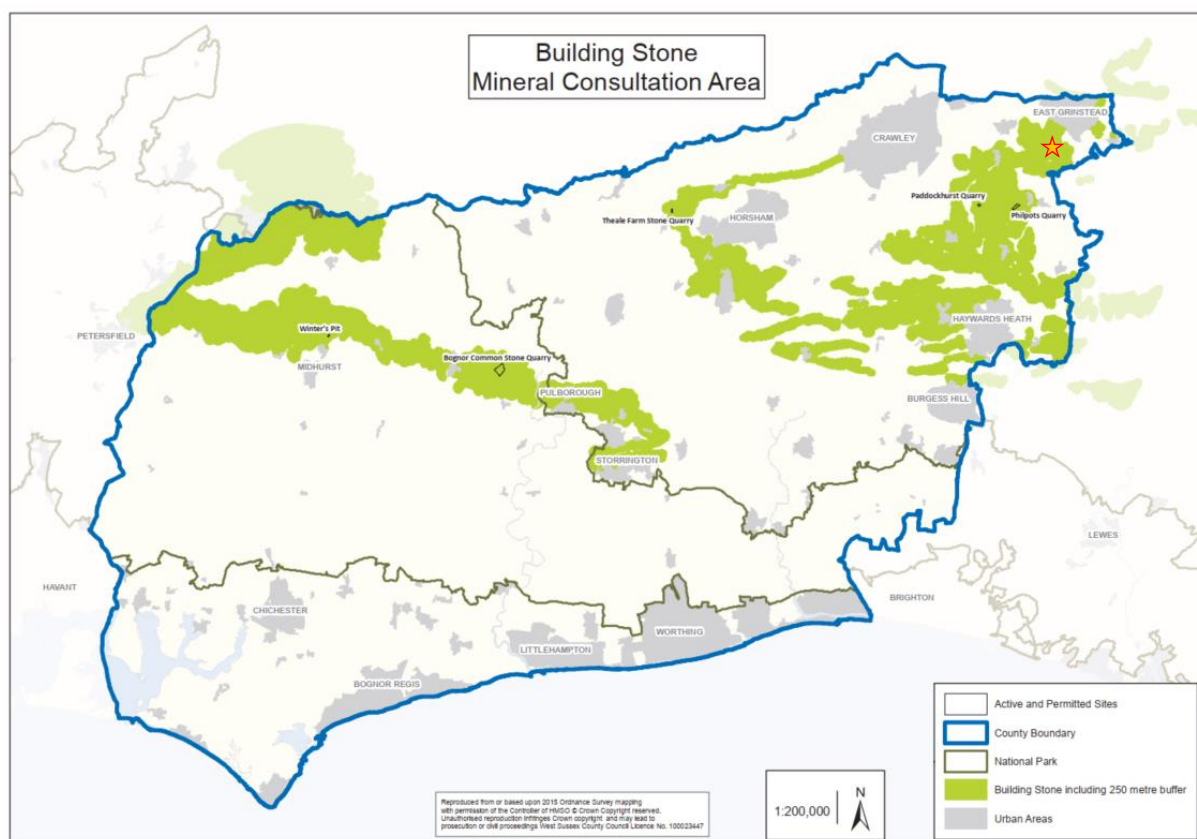
2.1.2 The Local Plan sets out 13 Strategic Objectives which are listed below.

- Strategic Objective 1: To promote the prudent and efficient production and use of minerals and to ensure a steady and adequate supply, having regard to the market demand and constraints on supply in the Plan area.
- Strategic Objective 2: To maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources; in particular to reduce reliance on land-won aggregates.
- Strategic Objective 3: To make provision for soft sand, silica sand and sharp sand and gravel, to meet the identified need, from outside the South Downs National Park, where possible; and only allow development within the national park in exceptional circumstances and where it is in the public interest
- Strategic Objective 4: To protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via the ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley, and Ardingly.
- Strategic Objective 5: To safeguard potential economically viable mineral resources from sterilisation. It should be noted that the West Sussex Waste Local Plan specifically recognises the need for waste development to avoid sterilisation of minerals resources and includes Strategic Objective 11 which is: “To conserve and safeguard the County’s important mineral resources”.
- Strategic Objective 6: To protect, and where possible enhance, the health and amenity of residents, businesses, and visitors.
- Strategic Objective 7: To conserve and enhance the landscape and townscape character of West Sussex and the special qualities of the South Downs National Park and the local distinctiveness and character of the High Weald AONB and Chichester Harbour AONB and the settings of all protected landscapes.
- Strategic Objective 8: To protect and, where possible, enhance the natural and historic environment and resources of West Sussex.
- Strategic Objective 9: To minimise the risk to people and property from flooding; to safeguard water resources, including aquifers and surface waters, from contamination; to ensure the quality and quantity of the water environment is conserved and enhanced.
- Strategic Objective 10: To maximise the use of rail and water transport for the movement of minerals and to minimise lorry movements and the use of local roads for minerals.
- Strategic Objective 11: To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development, whilst recognising the national commitment to maintain and enhance energy security in the UK.
- Strategic Objective 12: To ensure high quality mitigation and restoration to appropriate afteruses.
- Strategic Objective 13: To minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change.

2.2 Potentially Affected Mineral Resources

- 2.2.1 The key minerals covered by the Local Plan are Brick Clay, Soft Sand, Sharp sand/Gravel, Chalk and Building Stone.
- 2.2.2 The site lies within a 'Brick Clay Resource Mineral Safeguarding Area' associated with the Wadhurst Clay Formation and in an area 'Building Stone Mineral Safeguarding Area' associated with the Ardingly/Lower Tunbridge Wells Sandstone.
- 2.2.3 The relevant maps are presented below with the approximate site location indicated with a star.





2.2.4 It is noted that the cumulative areas of development are understood to be <3ha. With reference to Table 1 of the Minerals and Waste Safeguarding Guidance it is understood that this would not require consultation with the Mineral Planning Authority on the subject of building stone, but would require consultation in respect of Wadhurst Clay.

Table 1: Thresholds

Location of Proposed Non-Mineral Development	Residential Applications: When to Consult MPA	Non-Residential Applications: When to Consult MPA
Within 250m of existing, permitted and allocated mineral sites	All applications	All applications
Within the sharp sand and gravel MCA	All applications for 10 dwellings or more or on 0.5ha or more – subject to the exceptions below	All applications for 1,000sqm or more or on 1ha or more – subject to the exceptions below
Within the soft sand (including potential silica sand) MCA	All applications for 10 dwellings or more or on 0.5ha or more – subject to the exceptions below	All applications for 1,000sqm or more or on 1ha or more – subject to the exceptions below
Within the Wadhurst clay MCA	All applications for 10 dwellings or more or on 0.5ha or more – subject to the exceptions below	All applications for 1,000sqm or more or on 1ha or more – subject to the exceptions below
Within the Weald clay MCA	All applications for non-mineral development on 3ha or more – subject to the exceptions below	All applications for non-mineral development on 3ha or more – subject to the exceptions below
Within the building stone MCA	All applications for non-mineral development on 3ha or more – subject to the exceptions below	All applications for non-mineral development on 3ha or more – subject to the exceptions below

2.2.5 To ensure suitable prudence, this report will assess both mineral resources.

3 Brick Clay

3.1.1 The Local Plan states that clay extraction for the purposes of brickmaking, tiles and pipes has a long-established history in the central and northeastern parts of the County.

3.1.2 While the plan states there are five active clay sites in West Sussex, West Hoathly Brickworks has since ceased production and is being decommissioned. The most recent Annual Monitoring Report (AMR) confirms there are currently 4, as tabulated below.

Table 3: List of Active Brickworks in West Sussex and Clay Type

SDNP / WSCC	Brickworks	Clay Type	Product
SDNP	Pitsham Brickworks	Gault Formation	Handmade bricks, chimneys, tiles (independent works)
WSCC	Warnham/ Langhurstwood Quarry	Weald Clay Formation	Commercial bricks
WSCC	Laybrook Brickworks	Weald Clay Formation	Commercial bricks
WSCC	Freshfield Lane Brickworks	Wadhurst Clay; East Grinstead Clay; Tunbridge Wells Sandstone	Commercial bricks

Note: Some information may be based on estimates therefore updated reserve data should be provided in support of any planning applications.

3.1.3 Brickworks are typically located close to (often adjacent) to the source of clay used at the brickworks and their ongoing operation is linked to the availability of clay at those sources. The nearest existing brickworks is Freshfield Lane Brickworks, some 10km to the south.

3.1.4 National policy requires Minerals Planning Authorities to provide for a 25-year stock of permitted reserves and it is understood from the AMR that 2 of the 4 sites have this reserve.

3.1.5 The strategy to increase reserves is to primarily support extensions of existing sites. Where proposals for extraction at new non-allocated sites are made they are assessed against policy M5 which states that sites should:

- help maintain a stock of permitted reserves of at least 25 years of permitted clay reserves for individual brickworks; and the clay required for appropriate blending for manufacture of bricks is no longer available adjacent to the brick making factory.
- be within an existing sand and gravel quarry and the extraction of clay would be ancillary to the extraction of sand and gravel.
- be located outside the High Weald AONB/South Downs National Park unless there are exceptional circumstances and that it is in the public interest
- be extensions of time and and/or physical extensions to existing clay pits or, where this is not possible, they should be sited as close as possible to the site where the clay will be used
- be sites where if transportation by rail or water is not practicable or viable, the proposal is well-related to the Lorry Route Network.

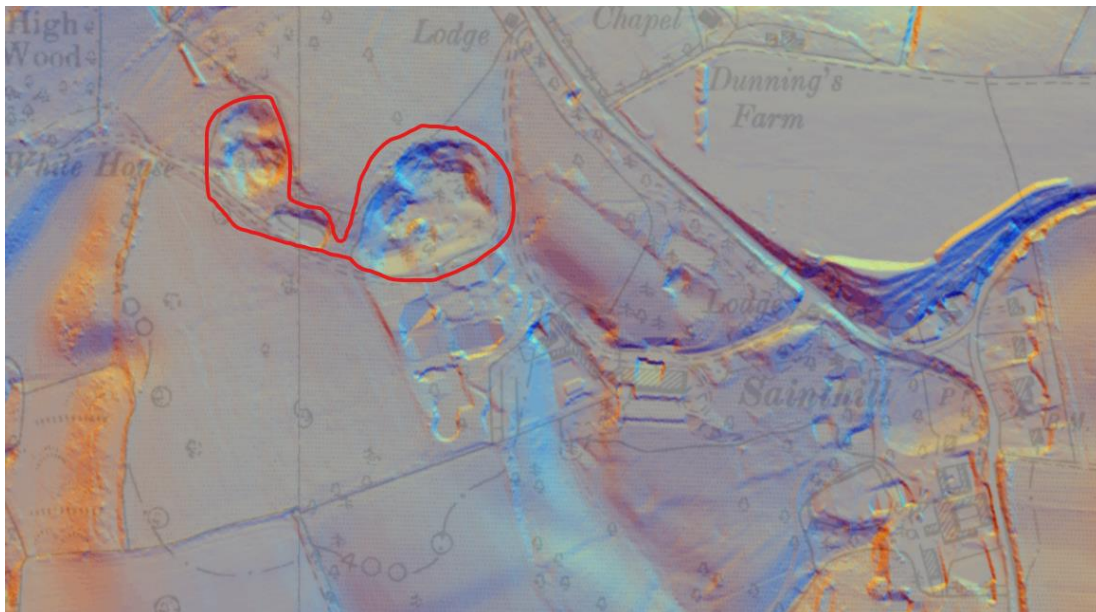
3.1.6 The site is not close to an existing brickworks, it is not within an existing sand and gravel quarry, it is within the High Weald AONB and is not considered to be well related to the Lorry Route Network. Furthermore, the site features a Grade II listed building and estate and a brick earth quarry would be detrimental to the setting.

3.1.7 When assessed against the strategic objectives, extraction of brick earth would not accord with Strategic Objective 7, Strategic Objective 8 or Strategic Objective 10.

3.1.8 Accordingly, even if active commercial extraction of brick earth was proposed it would not be considered appropriate on this site.

4 Building Stone

- 4.1.1 Ardingly Stone is a sandstone within the lower Tunbridge Wells strata.
- 4.1.2 According to the recent AMR there were 4 active stone extraction sites, three of which are for building stone. It is understood that there is no requirement for authorities to make provision for the production of sandstone as it is generally a small-scale industry which provides local stone of distinctive character.
- 4.1.3 The plan further states that 'evidence suggests there is no need to allocate any additional sites (or extensions to existing sites) for stone and the strategy is therefore to meet projected demand for sandstone from existing permitted quarries'.
- 4.1.4 It is therefore concluded that given the nature of the site (set out in Section 3) and the lack of need for new commercial stone extraction, that future commercial extraction is not credible.
- 4.1.5 This being said, the NPPF does however state that local planning authorities should safeguard mineral resource of local and national importance (paragraph 143, NPPF) and 'consider how to meet demand for small-scale extraction of building stone ... for the repair of heritage assets' (paragraph 144, NPPF).
- 4.1.6 The listed Saint Hill Manor, located on site, is built from what is assumed to be locally extracted sandstone. There are visible depressions on lidar imagery of the site (below) which are likely to be the extraction, although this is not confirmed.



- 4.1.7 With reference to the West Sussex Building Stone Atlas, Ardingly Sandstone is noted to weather evenly and although it is soft when freshly quarried, it hardens over time. A tough surface skin (caused by weathering where salts accumulate and harden on the surface of the rock) develops on naturally-exposed stone surfaces. Given this durability and the considering that the manor is inhabited and maintained, the likelihood of significant future restoration requiring a large amount of replacement stone is considered to be low, but cannot be wholly discounted. In the event that the manor requires future restoration it may be necessary to source new stone to match.

- 4.1.8 This being said, even when required for the purposes of restoration there are restrictions for even small scale extractions, set out in Policy M6. The requirements are summarised below.
- Proposals will be permitted for extraction of building stone, including extensions of time and physical extensions to existing sites, provided that:
 - they are needed to provide suitable local building stone necessary for restoration work associated with the maintenance of historic buildings and structures and new build projects;
 - the stone cannot be reasonably sourced from existing permitted quarries;
 - they are located outside the High Weald AONB/South Downs National Park unless there are exceptional circumstances
 - where transportation by rail or water is not practicable or viable, the proposal is well-related to the Lorry Route Network.
- 4.1.9 The site itself is within the AONB and any extraction activities would likely be considered to be detrimental to the setting of the listed building such to outweigh the desire for having an exact stone match. Philpots Quarry, ~4km to the southwest is understood to be in full scale production of Ardingly Sandstone and it is likely that this would be suitably similar for any restoration.
- 4.1.10 If the stone is not suitable and an extraction MUST be considered onsite the most suitable extraction locations would be considered. The proposed car park is overlain by Grinstead Clay with competent sandstone potentially at 4m+.
- 4.1.11 In areas to the south, the rock head is expected to be ~2-3m and there are undeveloped fields which would be more appropriate for stone extraction.
- 4.1.12 The development adjacent to the castle will comprise basement excavation which may comprise excavation through sandstone. Based on borehole records this is likely to be weathered and thinly bedded, and thus not suitable as building stone. The developments would essentially 'sterilise' access to sandstone below the footprint of the buildings. However, in addition to the reasons set out above even if extraction was approved it would not be appropriate in such close proximity to an existing building. Further, the extensions are relatively modest in area, compared to the site as a whole and the loss of extraction potential is considered to be insignificant.

5 Conclusion

- 5.1.1 The local plan states that ‘Unless the [Minerals Resourcing Assessment] MRA can prove that there is no economically viable resource present, sterilisation will occur. The MRA will then need to address points (ii) and (iii) of Policy M9 to determine whether it is appropriate or practicable to extract the mineral prior to the development taking place or whether the overriding need for the development outweighs the safeguarding of the minerals and it has been demonstrated that prior extraction is not practicable or feasible’.
- 5.1.2 The site has been assessed as being unsuitable for commercial mineral extraction owing to its location within the High Weald AONB, the presence of a Grade II Listed Building and the remoteness from the Lorry Route Network.
- 5.1.3 While there *may* be brick earth present it is not considered to be viable for extraction and thus the car park development is not considered to cause sterilisation.
- 5.1.4 Construction of the proposed extensions to the castle and small toilet blocks could arguably result in sterilisation for small scale extraction of building stone for restoration purposes. However, as has been set out above, neither prior nor future extraction of sandstone in these areas is considered either practical or feasible.
- 5.1.5 The crane base will comprise compacted aggregates to provide a suitable platform and will not change the site materially from the grass areas adjacent. Therefore no sterilisation is considered to occur.
- 5.1.6 Accordingly, the proposed development is not considered to be detrimental to mineral safeguarding.