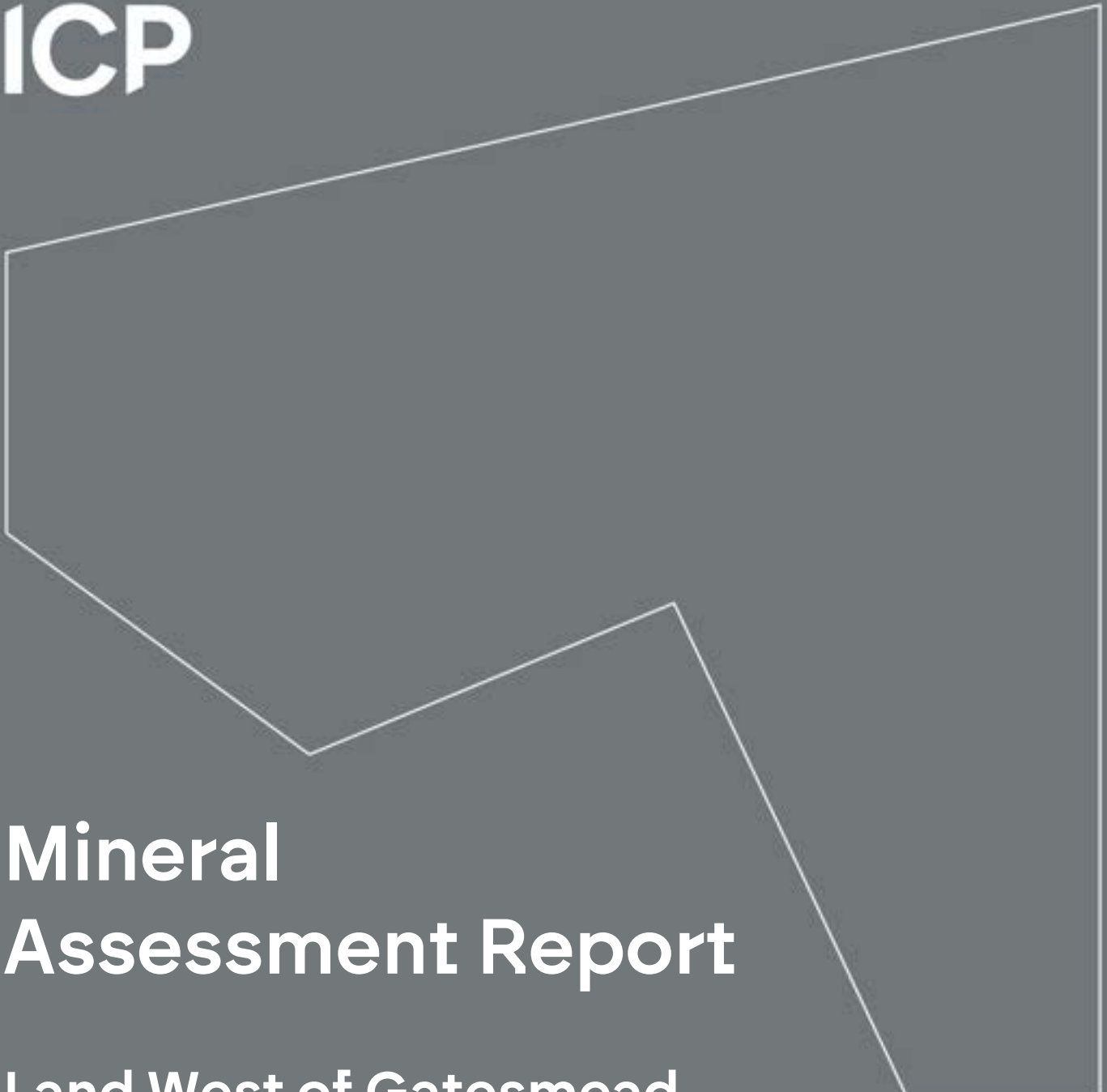




ICP

Mineral Assessment Report

Land West of Gatesmead,
Haywards Heath

April 2026

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1 Executive Summary

- 1.1 This Mineral Assessment Report has been undertaken to assess the impact of the proposal on the mineral resources that are present beneath the site.
- 1.2 The site is primarily safeguarded for brick clay, a widely available resources across most of West Sussex and one which the WSJMLP identifies as having in excess of 25 years' worth of supply across the county. There is a very small portion of the site that is also safeguarded for building stone. Similarly, the WSJMLP outlines that the demand for building stone will be met by existing quarries over the course of the plan period. As a result, it is considered the loss of the mineral resources beneath the site will not undermine the long-term supply of minerals across the county.
- 1.3 In addition, it has also been demonstrated that the entirety of the mineral resources within the site are already sterilised by existing site constraints, in particular the dwellings immediately to the east of the site and around 50m to the west. Mineral extraction on the site would therefore not be practical or viable owing to the potential detrimental impact it would have on the residential amenity of these existing residents. Consequently, the mineral resources beneath the site could not be extracted in any event, irrespective of the proposal.
- 1.4 On this basis it is considered that the mineral safeguarding designations within the site should not preclude the proposal.

2 Introduction

- 2.1 This Mineral Assessment Report ('MAR') has been prepared on behalf of Crest Nicholson Operations Ltd ('the applicant') in support of a full planning application for 49 new homes together with open space and associated infrastructure ('the proposal') on land West of Gatesmead, Haywards Heath ('the site').
- 2.2 The site is circa 4.5 hectares and lies within the county of West Sussex which is a two-tiered authority area. West Sussex County Council ('WSCC') is the Minerals Planning Authority ('MPA'). The site lies within the Mid Sussex district and consequently Mid Sussex District Council ('MSDC') is the Local Planning Authority ('LPA').

Structure of this Report

- 2.3 This MAR has been prepared following a review of the available information produced by the British Geological Survey ('BGS'), the WSCC Minerals Local Plan and supporting background papers and relevant existing planning application information.
- 2.4 The purpose is to provide an initial understanding of mineral resource considerations and to identify any existing constraints on the site that would mean that mineral extraction on the site would not be practical or feasible.
- 2.5 The remainder of this assessment is structured as follows:
- Section 2 – **Planning Policy** - Outlines the relevant national and local planning policies, with particular reference to WSCC's approach to mineral safeguarding and prior extraction.
 - Section 3 – **The Mineral Resource** - Describes the geological context of the site based on BGS mapping, identifies the type and extent of any mineral resources present, and considers their potential economic viability.
 - Section 4 – **Planning Policy Assessment** - Evaluates the proposal against applicable policy requirements, including safeguarding criteria, and highlights site-specific constraints—such as environmental designations, surrounding land uses, and infrastructure—that would significantly limit the potential for mineral extraction, thereby reducing potential conflict with the proposed housing scheme.

- Section 5 – **Conclusion** - Summarises the findings of this high-level review, setting out why the presence of safeguarded minerals should not preclude the proposal when all material considerations are taken into account.

3 Minerals Planning Policy

- 3.1 The following section sets out the relevant national and local planning policies that are applicable to safeguarding mineral resources that are affected by the proposed scheme.

National Planning Policy Framework (NPPF) – December 2024

- 3.2 Chapter 17 of the NPPF, entitled “Facilitating the sustainable use of minerals”, provides several policy details covering a wide range of matters relating to mineral planning. These requirements are relevant not only to the determination of planning applications, but also to the preparation of local plans, minerals local plans, and other development plan documents. Paragraph 222 outlines the overall policy approach to mineral supply, recognising that mineral resources are finite and limited:

222. It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.

- 3.3 Following this overarching policy position statement, the NPPF then outlines the specific measures that mineral planning policies should cover in paragraph 223. These measures provide a framework for both day-to-day decision-making and the strategic preparation of plans, ensuring that mineral resources are identified, protected, and used responsibly over the plan period. In relation to the safeguarding of mineral resources, the following clarification is made in subsection c) of paragraph 223:

223(c). [Mineral Planning Authorities] safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked).

- 3.4 The prescribed approach to mineral safeguarding is further explained within paragraph 225, which states:

225. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

- 3.5 National planning policy is clear that any potentially viable mineral working should not be needlessly sterilised by permanent alternative development. These provisions apply both in plan preparation, where the spatial distribution of development must take account of mineral safeguarding, and in development management, where proposals are tested against safeguarding policies. The NPPF therefore sets out the broad principles against which local minerals policies must be framed, ensuring that long-term access to mineral resources is protected for future generations.

West Sussex Joint Minerals Local Plan

- 3.6 The West Sussex Joint Minerals Local Plan ('WSJMLP') was adopted in July 2020 and formally updated in March 2021 following a Soft Sand Review. It sets out a vision and strategic objectives for sustainable minerals development, development management policies to ensure mineral development does not cause unacceptable harm to the environment, economy or communities and finally four site allocations to ensure the need for minerals is met across the county over the plan period.
- 3.7 Policy M9 of the WSJMLP is particularly relevant in this instance as it relates to non-mineral development on safeguarded land. It states (as material):

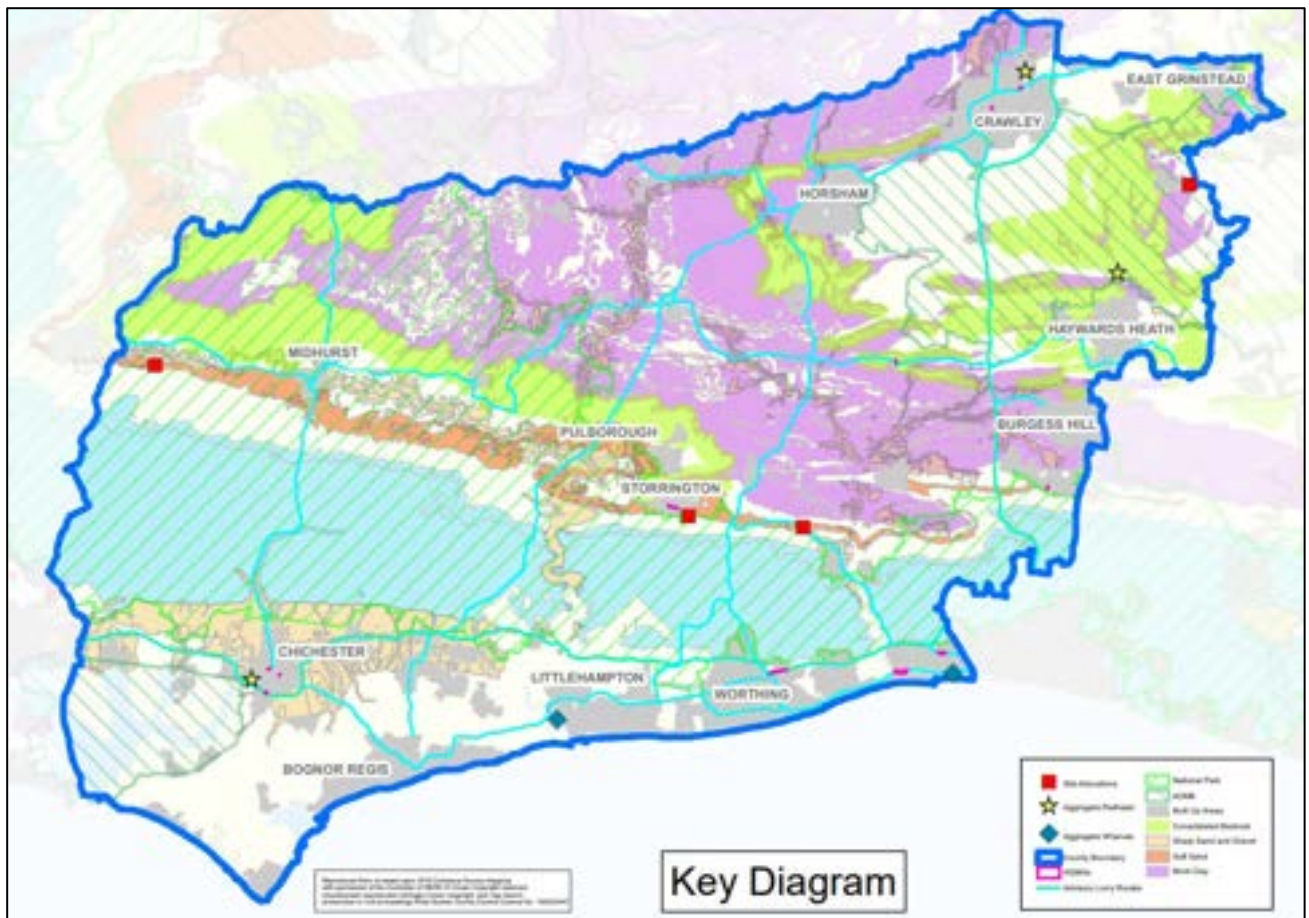
"Proposals for non-mineral development within the Minerals Safeguarded Areas (as shown on maps in Appendix E) will not be permitted unless:

- (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."*

4 The Mineral Resource

- 4.1 The adopted WSJMLP is accompanied by a series of maps which identify the areas safeguarded owing to the mineral resources present. The countywide West Sussex Mineral Safeguarding Map is provided in Appendix 1 of this report. Furthermore, a plan has been prepared which shows the safeguarded areas as a site level which is shown in Appendix 2.
- 4.2 The site is primarily safeguarded for brick clay, with a small part of the northernmost extent safeguarded for building stone. An extract from the West Sussex Mineral Safeguarding Map is shown at Figure 4.1 below. This shows that the majority of the northern part of West Sussex is safeguarded for brick clay (area coloured purple) and therefore it is clear that it is a widely available mineral resource. Building stone is less widespread but nonetheless there are still large parts of the northern half of the county that are safeguarded for this mineral type.

Figure 4.1 – West Sussex Mineral Safeguarding Map



Brick Clay Deposits in West Sussex

- 4.3 The WSJMLP states that West Sussex contains regionally important brick-making raw materials. This brick clay is split into two different resources, the Weald and the Wadhurst (which is found beneath the site) formations.
- 4.4 The WSJMLP states that there are five active brickworks within West Sussex, with their own supplies of clay, which have a total permitted reserve of 18.7mt. Three of these active brickworks have in excess of 25 years of clay reserves, one has 24 years and the brickworks at West Hoathly have less than 10 years' reserves (2016 data). In order to maintain an adequate supply of the clay, the WSJMLP sets out that the strategy is to allocate an extension to the West Hoathly brickworks.
- 4.5 The implementation of the WSJMLP is subject to annual monitoring reports which updates the mineral extraction and supply data referenced within the plan. The most recent monitoring report that is publicly accessible covers the 2022/23 period.
- 4.6 The 2022/23 monitoring report states that the total permitted reserves of brick clay (it does not distinguish between different clay formations) has reduced since the adoption of the WSJMLP. The 2022/23 figures state that there is a total permitted reserve of 12.8mt across five sites (four active and one inactive). The monitoring report notes that brick clay supply is not subject to an apportionment figure but still has an important role to play in West Sussex and the wider economy.
- 4.7 The monitoring report notes that Paragraph 220 of the NPPF states that MPAs should plan for maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment. For brick clay reserves should be at least 25 years. There are estimated to be two brickworks in West Sussex with at least 25 years of reserves. Therefore, on that basis the supply of brick clay in West Sussex complies with the NPPF requirements.

Building Stone in West Sussex

- 4.8 The WSJMLP outlines the fact 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."*
- 4.9 It goes on to state that *"The 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.” On this basis it is clear that there is an adequate supply of building stone around the county that is extracted from existing quarries.

Summary

- 4.10 The site is safeguarded for both brick clay and building stone. The WSJMLP is clear that both of these resources are widespread and there exists adequate provision elsewhere at existing facilities to meet the demand for both. Consequently, the proposal will not undermine WSCC’s ability to meet the supply of minerals across the plan period as required by the NPPF.

5 Minerals Assessment

- 5.1 This section considers the existing constraints that are likely to affect the potential to recover minerals from the application site.
- 5.2 Policy M9 of the WSJMP establishes the criteria under which non-mineral development may be permitted within a Mineral Safeguarding Area, including where constraints mean prior extraction is not feasible or viable. Applying this policy framework allows the identification of relevant site-specific limitations and helps to form a reasoned view on whether the safeguarded minerals beneath the site can or should be worked in advance of development.
- 5.3 This section of the report should be read alongside the drawings included in Appendix B which show the areas of the site safeguarded for both brick clay and building stone as well as the extent of these areas which are effectively already sterilised from existing site constraints.

Existing Environmental Constraints

- 5.4 The following section of this report highlights features in and around the site that would represent a significant constraint to any potential mineral extraction. It is important to review the existing constraints so that the level of sterilisation which would already exists on the site can be understood.
- 5.5 Mineral extraction will result in impacts upon amenity (e.g. dust, noise, vibration and visual impact). As such, the degree to which the site is already effectively sterilised by existing receptors needs to be considered when establishing mineral sterilisation which would occur as a result of the proposal.
- 5.6 This section of the report is accompanied by Drawing ref: ICP/OWL/002 (Appendix B) that has broadly highlighted the extent to which the mineral resources found on-site are already effectively sterilised. The following details and associated standoff distances from any possible mineral extraction scheme have been used:
- Residential properties – 250m standoff in all direction;
 - Hedgerows – 10m standoff;
 - Woodlands – 15m standoff;
 - Roads – 20m standoff;

- 5.7 It is accepted that there are no statutory standoffs required for mineral developments. The above-mentioned distances are based on experience of the author's involvement with multiple mineral extraction sites nationwide.
- 5.8 In relation to the 250m distance from residential properties, this distance has been used as within that range it is more likely that the effects of noise, air quality and vibration will need to be significantly controlled and mitigated to avoid having unacceptable impacts.
- 5.9 The logic of using the 250m standoff distance is consistent with the approach outlined within West Sussex Councils Mineral Safeguarding guidance. The safeguarding guidance uses the 250m distance as a buffer zone around safeguarded minerals sites and infrastructure. Any non-minerals development that is proposed within this 250m buffer zone needs to be assessed to ensure that it will not introduce a new receptor, or receptors, that could impinge upon the operation of that site.
- 5.10 The SPD advises that unacceptable levels of dust, noise, lighting and vibration could be experienced by receptors within that 250m distance. This distance is used to ensure that new non-mineral related development brought forward within the 250m buffer zone does not result in any additional mitigation being placed upon minerals operators as they would introduce new sensitive receptors. This approach is consistent with the “agent of change” principle which is outlined in the NPPF¹.
- 5.11 These activities, with their associated noise, dust, vibration, traffic, and visual impacts, underline why a 250m standoff is considered necessary to protect sensitive receptors such as residential development.
- 5.12 It is accepted that residential receptors can be located within 250m of an active minerals operation and equally that there can be receptors beyond 250m that do experience unacceptable amenity impacts. For the purposes of this assessment, the 250m distance provides a robust indication of an acceptable proximity to a residential receptor.
- 5.13 The standoff distances noted for the hedgerows and woodlands are based on general working practices and would vary based on each section of vegetation. For the purposes of this assessment, the distance indicated on the plan is from the tree or hedgerow to any potential extraction. Ancillary mineral extraction features such as soil mounds, fencing and drainage channels would be accommodated within that distance.

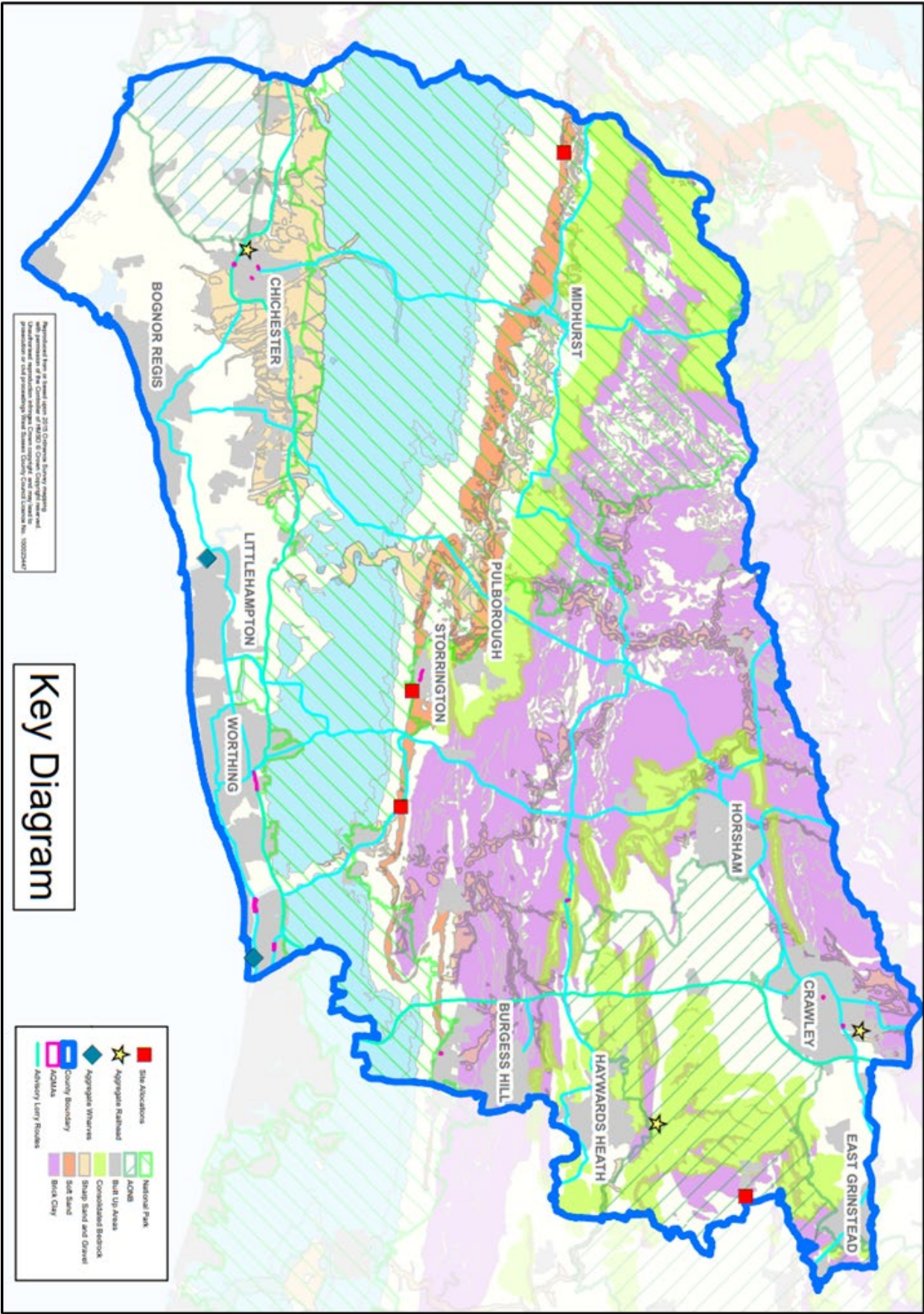
¹ Paragraph 200

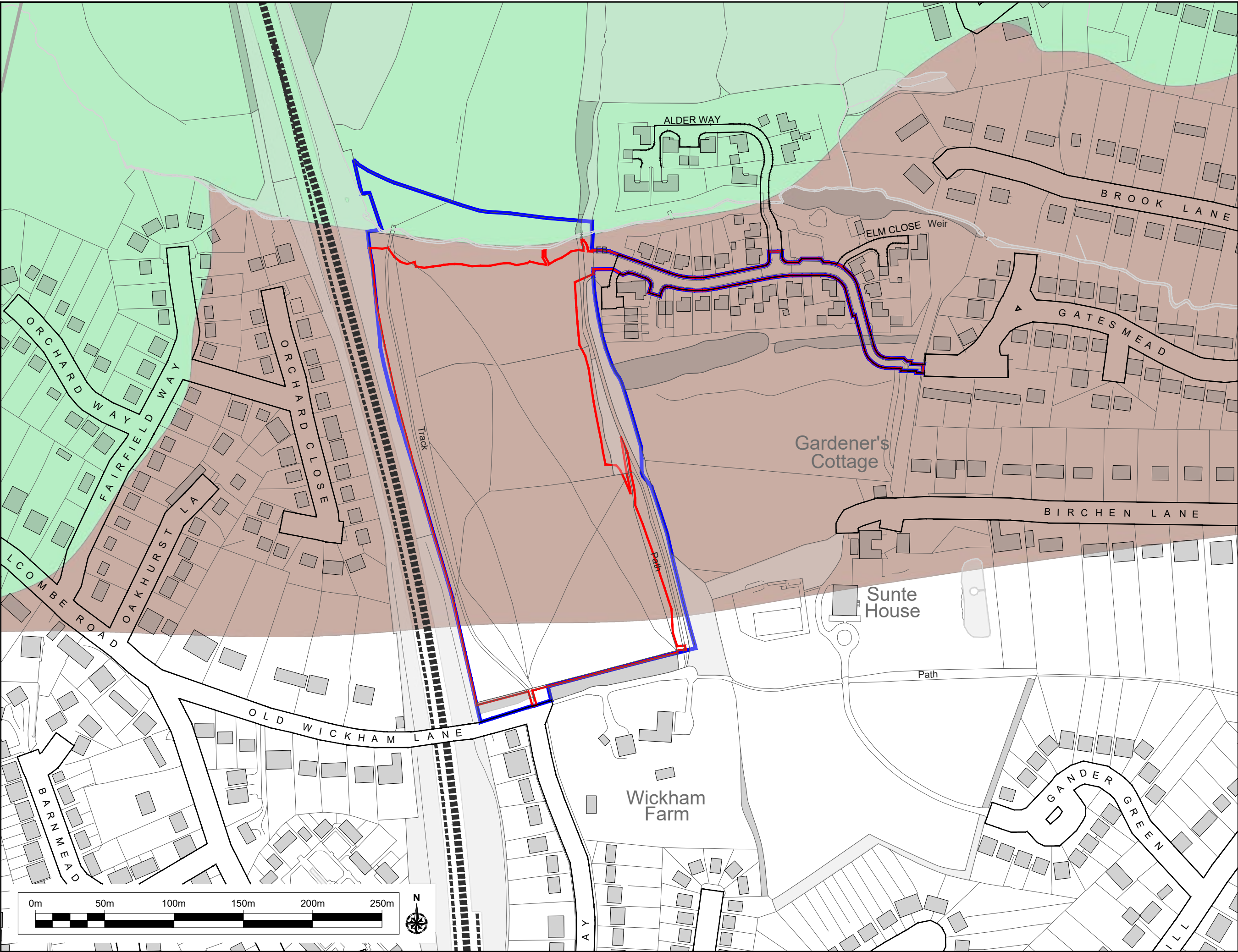
- 5.14 The presence of the public highway can also constrain development. Excavation areas generally have to stand off from the public highway to ensure that the roads remain geotechnically stable and they do not present a risk to road users if a vehicle was to leave the carriageway. Typically, a 20m stand off from
- 5.15 Drawing ICP/OWL/002 has mapped all of these existing constraints onto a plan for the site to provide an indication of the potential existing mineral sterilisation. The residential properties on Orchard Close approximately 50m to the west of the western boundary of the site as well as those located immediately to the east of the eastern boundary on Gatesmead effectively sterilise the entirety of the site.
- 5.16 As a result, it would not be practical to extract any of the mineral resources within the site without leading to a potentially detrimental impact on the residential amenity of the existing residents that surround the site. Consequently, any future proposal for a mineral development on the site would be in direct conflict with the development management policies outlined in the WSJMLP.

6 Conclusion

- 6.1 This Mineral Assessment Report has been undertaken to assess the impact of the proposal on the mineral resources that are present beneath the site.
- 6.2 The site is primarily safeguarded for brick clay, a widely available resources across most of West Sussex and one which the WSJMLP identifies as having in excess of 25 years' worth of supply across the county. There is a very small portion of the site that is also safeguarded for building stone. Similarly, the WSJMLP outlines that the demand for building stone will be met by existing quarries over the course of the plan period. As a result, it is considered the loss of the mineral resources beneath the site will not undermine the long-term supply of minerals across the county.
- 6.3 In addition, it has also been demonstrated that the entirety of the mineral resources within the site are already sterilised by existing site constraints, in particular the dwellings immediately to the east of the site and around 50m to the west. Mineral extraction on the site would therefore not be practical or viable owing to the potential detrimental impact it would have on the residential amenity of these existing residents. Consequently, the mineral resources beneath the site could not be extracted in any event, irrespective of the proposal.
- 6.4 On this basis it is considered that the mineral safeguarding designations within the site should not preclude the proposal.

Appendix A
West Sussex Minerals Safeguarding Area Map

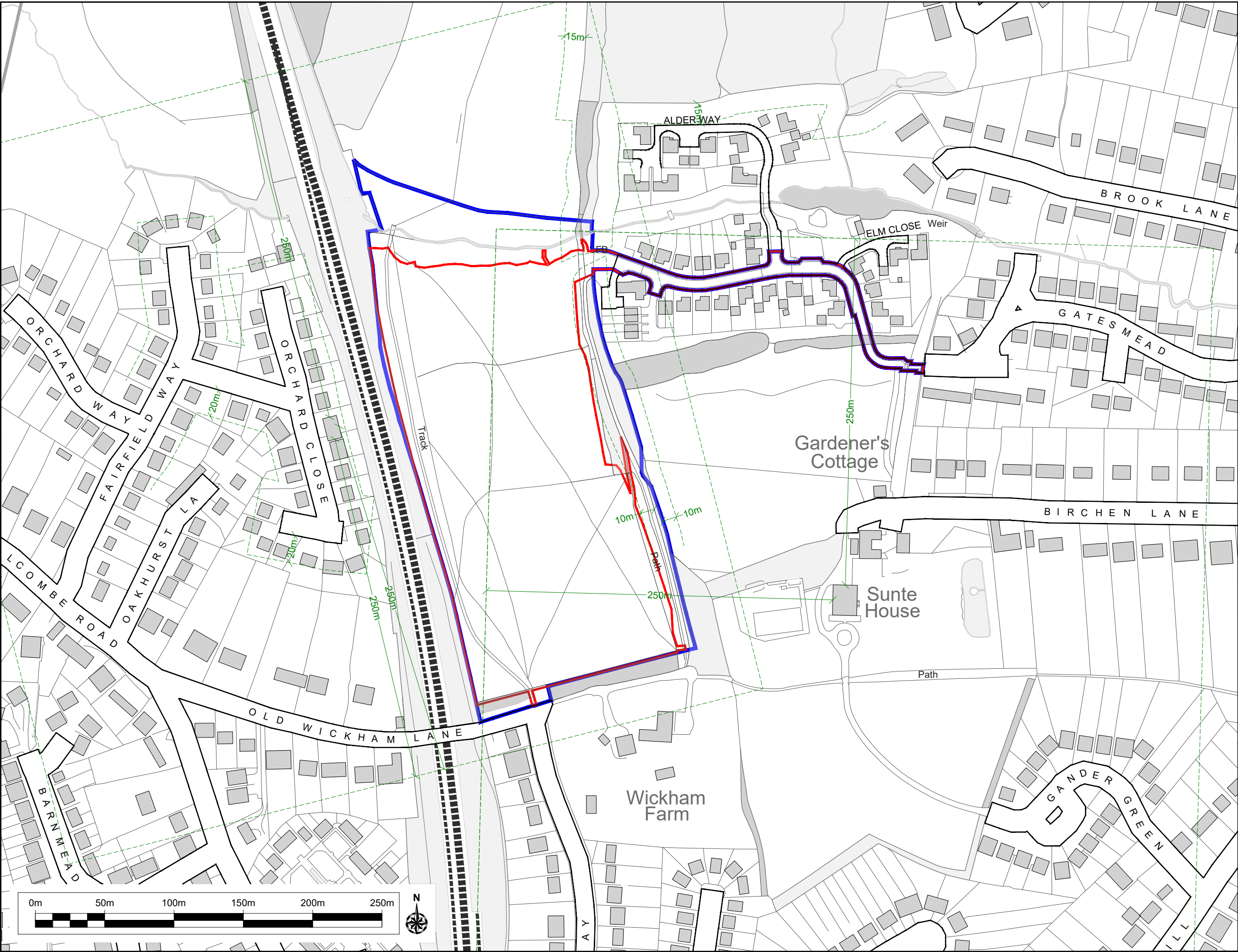




LEGEND

- OWNERSHIP BOUNDARY
- APPROXIMATE SITE BOUNDARY
- BRICK CLAY
- BUILDING STONE

Rev	Date	Details			Chkd
IC Planning Ltd Portland House - Block D New Bridge Street West Newcastle upon Tyne NE1 8AL Tel: 01910548 0570			ICP  <i>Defining beyond boundaries</i>		
			Web: www.icplanning.co.uk		
Date	Scale	Drawn	Checked	Approved	
15/04/2026	1:2500 @ A3	by GTB	by NP	by NP	
Drawing Status					
WORKING DRAWING					
Project Title OLD WHICKHAM LANE HAYWARDS HEATH					
Drawing Title MINERAL SAFEGUARDING PLAN					
Drawing Number ICP/OWL/001				Rev -	



- LEGEND**
- OWNERSHIP BOUNDARY
 - APPROXIMATE SITE BOUNDARY
 - BRICK CLAY
 - BUILDING STONE
 - TYPICAL STERILISED STAND OFF

NOTE

MINERALS SAFEGUARDING AREAS ALREADY STERILISED BY EXISTING LANDSCAPE FEATURES

- 250m from any residential property in all directions
- Any woodlands 15m and 10m from any hedgerows
- 20m from any roads

Rev					Date	Details		Chkd	
IC Planning Ltd Portland House - Block D New Bridge Street West Newcastle upon Tyne NE1 8AL Tel: 01910548 0570						ICP  <i>Defining Beyond Boundaries</i> Web: www.icplanning.co.uk			
Date		Scale		Drawn by		Checked by		Approved by	
15/04/2026		1:2500 @ A3		GTB		NP		NP	
Drawing Status									
WORKING DRAWING									
Project Title OLD WHICKHAM LANE HAYWARDS HEATH									
Drawing Title EXISTING MINERAL EXTRACTION CONSTRAINTS PLAN									
Drawing Number ICP/OWL/002								Rev -	