

# OMNIA

## Phase I Minerals Resource Assessment

**Land west of Kings Business Centre, Reeds Lane,  
Sayers Common, Sussex, BN6 9LS**

*Prepared for:  
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## QUALITY ASSURANCE

**Project Number: A12568**

**November 2025**

Geo-Environmental	<b>Minerals Resource Assessment</b>				
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## Executive Summary

<b>Site Address</b>	Land west of King Business Centre, Reeds Lane, Sayers Common, Sussex, BN6 9LS
<b>National Grid Reference</b>	526247 , 118181
<b>Site Area</b>	4.2 ha
<b>Current Site Use</b>	The site is currently undeveloped land with associated mature tree-lined boundaries.
<b>Geology &amp; Hydrogeology</b>	<p>Published geological mapping and local BGS logs indicate that the site is underlain by Topsoil which is further underlain by bedrock strata of the Weald Clay Formation.</p> <p>Local BGS logs suggest that Topsoil is likely to be of an average thickness of 0.40m.</p> <p>Shallow groundwater is anticipated at the site.</p> <p>The site is located within a Minerals Safeguarding Area for brick clay associated with the Weald Clay Formation.</p>

### Summary Statement

With respect to criteria (ii) and (iii) of policy M9 the following conclusions have been drawn:

***ii. It is appropriate and practicable to extract minerals prior to development taking place.***

Prior extraction of the mineral at this site is not considered viable.

Due to the volume of the resource and limited site size it is considered likely that mineral would need to be transported off site to a local established mineral operator for processing and therefore use of the extracted material as an aggregate is considered unlikely.

Furthermore, the likely timescales involved in bulk excavation of the limited mineral resource, subsequent infilling of the site with geotechnically suitable development platforms, and then development of the site as housing, are considered likely to delay the proposed development beyond the scope of the current District Plan (2021-2039) in which the subject is allocated for housing.

***(iii) – It has been demonstrated that prior extraction is not practicable***

This report demonstrates that the potential brick clay resource beneath the site is likely to be uneconomic due to the limited size of the site, and the constraining effect of residential dwellings and a public highway in close proximity which will require the implementation of no-dig buffers which will reduce the potential available resource to approximately 94,050m<sup>3</sup> or 122,265t.

However, whilst the bulk extraction of the underlying mineral resource is not considered to be practicable, in order to prevent total sterilisation of the underlying mineral resource, it is recommended that the re-use of site-won materials for the purposes of construction should be practicable subject to the excavated soils being suitable for the intended use.

Incidental extraction will be possible given the shallow resource depth (overburden thickness estimated at 0.40m) during the preparatory works required for the proposed development such as the formation of foundations and footings or landscaping works associated with the development.

The most likely potential would be to re-use the materials on-site for general fill and selected end uses such as capping material.

The logistics for undertaking the construction works to enable the beneficial re-use during the phased residential development of the site could be set out in a Minerals Recovery Strategy to be agreed with West Sussex County Council as Mineral Planning Authority and secured by planning condition.

**Recommendations**

It is recommended that consideration is given to the incidental re-use of site-won mineral for the purposes of construction under a DoW CoP MMP.

It is recommended that this report is submitted to the Minerals Planning Authority for review as part of the planning application process.

A standalone Minerals Recovery Strategy should be produced and submitted to the Minerals Planning Authority for approval.

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## 1 INTRODUCTION

### 1.1 Background

Omnia have been commissioned by Reside Group to prepare a Phase I Minerals Resource Assessment (MRA) for the site comprising Land at Reeds Lane, Sayers Common, Sussex, BN6 9LS.

A site location plan is presented as Figure 1.0 within Appendix III.

### 1.2 Proposed Development

It is understood that Reside Holdings Ltd are involved with the development of the above site.

It is understood that a planning application is being prepared for submission to Mid Sussex District Council (MSDC) for the following development '*Erection of 80 new residential dwellings (Use Class C3), including affordable housing units, vehicular pedestrian and cycle access (including new footpath links to the east and west of the site along Reeds Lane), landscaping and open space, parking, sustainable drainage and other related works.*' The proposed site layout provided to Omnia for review is presented as Figure 2.0 and indicates that approximately the western 1/3 of the site is proposed to be allocated as Public Open Space.

Policy DPSC6 of the emerging Mid Sussex District Local Plan relates specifically to the subject site, and allocated the site for up to 100no. dwellings. Policy point 9 within Policy DPSC6 sets out a requirement to '*Address impacts associated with the brick clay (Weald) Minerals Safeguarding Area*'.

Local minerals guidance for the site area is covered under the West Sussex Joint Minerals Local Plan (MLP), which covers the period from 2018 to 2033.

A review of the (MLP), which was adopted in July 2018, indicates that the site is located within a minerals safeguarding area for Brick Clay associated with the Weald Clay Formation.

### 1.3 Objectives

This Mineral Resource Assessment (MRA) has been prepared in accordance with the 'Mineral Safeguarding Practice Guidance' (April 2019) produced by the Mineral Products Association and the Planning Officers' Society.

The guidance sets out that developers should provide sufficient information to enable the mineral planning authority (MPA) and local planning authority (LPA) to consider the potential effect of non-exempt development in Mineral Safeguarding areas/Mineral Consultation Areas (MSAs/MCAs) on mineral safeguarding, and the viability of prior extraction of mineral ahead, or in conjunction with, the non-mineral development.

The objectives of the Phase I Minerals Resource Assessment are to:

- Provide details of the geological site setting through review of published geological mapping;

- Provide commentary on the mineral resource underlying the site in the context of the Local Plan;
- Provide a high-level resource assessment taking into account buffers required due to identified site constraints;
- Provide comments on the potential impacts of the proposed development on the underlying mineral deposits; and,
- Provide a high-level assessment of the potential mineral viability.

## 1.4 Sources of Information

Background information was sought from the following sources:

- British Geological Survey Map (Sheet 318/333, Brighton and Worthing, Bedrock and Superficial edition at a scale of 1:50,000, 1996)
- Mid Sussex [Joint Minerals Local Plan](#) (MLP) (2018-2033) Adopted July 2018 [accessed on 13/11/2025]
- Department for Environment, Food and Rural Affairs (DEFRA) MAGIC Map Viewer, <https://magic.defra.gov.uk/MagicMap.aspx> [Accessed 13/11/2025];
- Gov.uk Check the long term flood risk for an area in England, [Check the long term flood risk for an area in England - GOV.UK](#). [Accessed 13/11/2025];
- Hopson, P. M., Bloodworth, A. J., Harrison, D. J Highley D. E. & Holloway, S. 1997. Mineral Resource information for Development Plans: Phase One West Sussex Resources and Constraints. *British Geological Survey Technical Report WF/98/5*
- Hopson, P. M., Bloodworth, A. J., Harrison, D. J Highley D. E. & Holloway, S. 1997. West Sussex Minerals Resources Map at a scale of 1:100,000.
- [Mineral Products Association and Planning Officers' Society \(MPA POS\) Minerals Safeguarding Practice Guidance v1.4 April 2019.](#)

## 1.5 Local Minerals Designation

The West Sussex MLP document forms the minerals strategy for the entirety of the county of West Sussex, including Mid Sussex. The Minerals plan provides a strategy for mineral supply within West Sussex until 2033 and includes designated areas which have been allocated 'Mineral Safeguarding Area' (MSA) Status.

A review of the MSA maps included in the MLP shows that the site is within a MSA for Brick Clay, associated with the Weald Clay Formation.

A review of the published BGS geological map for the area (Sheet 318/333, Brighton and Worthing, Bedrock and Superficial edition at a scale of 1:50,000, 1996) indicates that the site is underlain by bedrock strata of Weald Clay Formation (Mudstone). No superficial deposits are mapped at the site.

Brick Clay is identified in the MLP as being of economic importance in the manufacture of structural products such as bricks, pavers, clay tiles, and clay pipes.

## **1.6 Limitations**

The limitations of this report are presented in Appendix I.

## **1.7 Confidentiality**

Omnia has prepared this report solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed. Should any third party wish to use or rely upon the contents of the report, written approval must be sought from Omnia; a charge may be levied against such approval.

## 2 PLANNING POLICY

Current planning policy calls for a requirement to assess mineral reserves as part of the planning application process. A summary of the relevant planning policy is provided in the following sections.

### 2.1 National Minerals Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Sustainable development is at the heart of the NPPF (Section 2) and requires that Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area, and that local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. The NPPF also states that development proposals that accord with an up-to-date development plan should be approved without delay (Paragraph 11c).

Section 17 of the NPPF sets out the requirements for planning policy to facilitate the sustainable use of minerals.

Paragraphs 210 c), d) & e) of the National Planning Policy Framework (NPPF) requires local authorities to provide planning policies that:

*"c) 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);*

*d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;*

*e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;"*

*(f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;*

### 2.2 Local Minerals Policy

West Sussex County Council is the minerals planning authority for the entirety of the county of West Sussex, as such the West Sussex Joint Minerals Local Plan (MLP), which was adopted in July 2018, is applicable to Mid Sussex District Council. It is recommended that the MLP is read in conjunction with this report.

## 2.2.1 West Sussex Geological Setting

Section 3.3 of the MLP describes the overall geological setting of the West Sussex area, and provides pertinent information regarding minerals of economic importance.

*3.3.1 The Plan area lies largely within the 'Wealden District' described by the British Geological Survey. Beds of deposited material have been pushed into a dome or 'anticline' that has then been eroded. In simple terms, this has led to a sequence of broad zones from the south to the north-east of the Plan area:*

- *brickearth, London Clay, and gravels along the coastal plain;*
- *the chalks of the South Downs;*
- *various beds forming the Upper Greensand, Gault Clay, and Lower Greensand to the north of the chalk downs;*
- *the clay area of the Low Weald; and*
- *a mixed area of sandstones and clays forming part of the High Weald in a triangle between Horsham, East Grinstead, and Burgess Hill.*

*3.3.6 Clay extraction in West Sussex, for the purposes of brickmaking, has a long-established history in the central and north eastern parts of the County. Wealden stock bricks continue to be produced and have a distinctive character. Clay is also used for the production of tiles and pipes, and clay can also be used in the production of cement manufacture, and lining canals and lakes. There are five active clay sites in West Sussex, some of which are small operators, which account for 20-25% of the total in the Country. For more information on these sites see the West Sussex AMR.*

A review of Hopson, et al. (1997) indicates that the Weald Clay contains horizons rich in pyrite, siderite, calcite and shelly fossils which are generally avoided by quarrying operations due to significant quantities of one or more of these substances within the brick clay causing serious problems either in the manufacture or in-service performance of the bricks.

## 2.2.2 Mineral Safeguarding

Section 6.9 of the MLP provides information relating to safeguarding of mineral resources.

*6.9.1 Mineral resources are finite and must be protected to ensure future generations can meet their own needs. Minerals can only be worked where they naturally occur and with increased pressure on land use, resources should not be needlessly sterilised by other forms of development.*

*6.9.2 Sterilisation of mineral resources can occur as a result of surface development directly overlying the mineral resource, or by development that is situated on, or close to, the boundary of a resource. The approach to safeguarding each mineral type may vary according to the geology, supply, and demand for minerals.*

*6.9.3 Based on the BGS assessment of the best available geological knowledge, four mineral resources (sand and gravel, chalk, clay, and sandstone) were considered of economic importance in West Sussex, warranting safeguarding for future generations.*

6.9.4 Non-minerals development may be proposed which is considered so important as to override the need to safeguard a mineral resource. Such development may include that which is of national and/or wider strategic importance. In any event, when assessing proposals, the need for potentially sterilising development will be weighed against the need to avoid sterilisation of the underlying mineral and will take account of the objectives and policies of the development plan as a whole.

6.9.5 The strategic objective that is of particular relevance to the safeguarding of minerals is as follows:

- To safeguard potential economically viable mineral resources from sterilisation.

6.9.6 The plan safeguarding strategy is to ensure that the sand and gravel, chalk, clay and sandstone resources are appropriately safeguarded as described below in order that the potential sterilisation of important minerals is considered alongside other land uses when a planning application is being considered.

6.9.7 The safeguarded areas include a proximal buffer which extends 250m beyond its mapped extent. Defining MSAs does not carry a presumption that any areas within MSAs will ultimately be acceptable for mineral extraction.

#### Brick Clay

6.9.10 West Sussex contains regionally important brick-making raw materials. The most important clay resources that have been included in the brick clay MSA are the Weald and Wadhurst formations. Due to its broader extent and lesser demand the MSA for the Weald formation excludes urban areas. The clay MSA will also include Pitsham brickworks, although the Gault formation clay, which supplies Pitsham brickworks, will not be safeguarded in its entirety because it is only extracted in small quantities and not economically significant.

Within Section 6.9 the following policies are applicable to the site.

#### Policy M9 ‘Safeguarding Minerals’

- (a) Existing minerals extraction sites will be safeguarded against non-mineral development that prejudices their ability to supply minerals in the manner associated with the permitted activities.
- (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 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.

This then further elaborated upon with the following information.

6.9.13 *In order to ensure that consultation takes place between the County and District planning authorities a Mineral Consultation Area (MCA) has been defined. The MCA, which is published separately from the Minerals Local Plan, covers the same area as the MSA but also includes safeguarded minerals infrastructure. The MSA is to be included in District and Borough Council Local Plan Policies Maps. The MCA is a mechanism intended to ensure that consultation takes place between County and district/borough planning authorities in two-tier authority areas when mineral interests could be compromised by non-minerals development, especially in close proximity to a known mineral resource. District and Borough Councils will be required to consult the Authorities on proposals for non-mineral development in the MCA. Further explanation is provided in separate guidance on safeguarding.*

6.9.14 *Where non-mineral development is proposed, developers may be required to carry out investigation work to ascertain whether economically viable mineral resources are present and whether prior extraction is practicable. The results of this work should be reported in a 'Minerals Resource Assessment' that is submitted with any application (for more detail see separate guidance on safeguarding). For the Authorities to raise no objection to the non-mineral development, they will need to be satisfied that either minerals sterilisation will not occur (either because the mineral resources are not economically viable or that an appropriate and practicable level of prior extraction can take place) or because there is an overriding need for the development.*

6.9.15 *Pre-application discussions are encouraged to ensure that minerals safeguarding is considered at the earliest opportunity. Separate guidance has been published that explains further how safeguarding will work in practice.*

6.9.16 *MCAs will also include other infrastructure such as wharves, railheads, hydrocarbon production facilities, concrete batching plants and asphalt plants (see Policy M10). A list of safeguarded facilities is maintained in the Annual Monitoring Report.*

## 2.3 Emerging Local Plan

The subject site is identified within the emerging Local Plan for Sayers Common as DPSC6. The draft policy for DPSC6 allocates the site for up to 100no. dwellings. Policy 9 relating to DPSC6 states a requirement to 'address impacts associated with the brick clay (Weald) Minerals Safeguarding Area'.

### 3 SITE SETTING

#### 3.1 Site Details

*Table 3- Site Details*

Site Address	Land west of King Business Centre, Reeds Lane, Sayers Common, West Sussex, BN6 9LS
National Grid Reference	526247 , 118181
Site Area	4.2 ha

All acronyms used within this report are defined in the Glossary presented in Appendix II.

A site location plan is presented as Figure 1.0 within Appendix III.

#### 3.2 Current Site Use

##### 3.2.1 Site Description

The area of investigation is located immediately west of the existing built area of Sayers Common and is an approximately rectangular shaped parcel of land that covers an area of approximately 4.2 ha.

The site is located immediately west of a mixed-use development comprising residential properties in the north and the King Business Centre in the south. Further west is a plot of undeveloped land occupied by the Avtrade Global Headquarters with commercial/light industrial units located to the north of the Avtrade HQ buildings.

From information provided to Omnia, the site is understood to comprise an area of undeveloped land of assumed agricultural use with access via Reeds Lane in the southeastern corner of the site.

The southern, western, and northern boundaries were marked by mature deciduous trees, and the eastern boundary was marked by an active residential development to the east.

A site visit has not been undertaken as part of this Mineral Resource assessment.

#### 3.3 Surrounding Area

The surrounding land uses are summarised in Table 3-1 below:

*Table 3-1 Surrounding Land Use*

Direction	Land Use
North	Woodland and agricultural land
East	Residential developments and Sayers Common
South	Reeds Lane and agricultural land
West	Agricultural land and commercial/light industrial units

## 4 GEOLOGICAL SETTING

### 4.1 Geology and Hydrogeology

The published British Geological Survey Map (Sheet 318/333, Brighton and Worthing, Bedrock and Superficial edition at a scale of 1:50,000, 1996) indicates that the site is underlain by the following geological sequence:

*Table 4-1 Published Geological Sequence*

Geological Unit	Formation Name	Description	Aquifer Classification
Superficial	None recorded		
Bedrock	Weald Clay Formation	Mudstone	Unproductive Strata

Bedrock geology presented as Figure 3.0 in Appendix III.

The British Geological Survey Map for the subject site records no data for Artificial or Made Ground on the proposed site.

Review of the environmental database indicates that the site is not located within a groundwater Source Protection Zone (SPZ).

Based on local topography, it is considered that shallow groundwater, if present on site, will likely follow local topography and flow northwest.

#### 4.1.1 Groundwater and Surface Water Flooding

Based on data available from the government flood risk summary website, the site is not considered to be at risk of groundwater flooding.

The site is designated as being at very low risk of surface water flooding.

### 4.2 Borehole Logs

#### 4.2.1 Historical BGS Borehole Logs

A review of the [BGS GeolIndex](#) indicates that there are no historical borehole records within 250m of the subject site and as such the search has been extended to a 1km radius of the site with the strata encountered summarised in Table 4-3. BGS borehole locations within a 1km radius of the site presented as Figure 4.0.

*Table 4-3 Summary of Strata Indicated by BGS Borehole Logs*

Borehole Name	X	Y	Distance (km)	Direction	Strata Encountered	Thickness (m)
TQ21NE125	527014	118237	0.70	East	Topsoil	0.35
					Made Ground	0.80
					Weald Clay	0.35
TQ21NE32	527024	118227	0.70	East	Topsoil	0.45
					Weald Clay	4.55

Borehole Name	X	Y	Distance (km)	Direction	Strata Encountered	Thickness (m)
TQ21NE128	527022	118251	0.70	East	Made Ground	0.90
					Weald Clay	0.60
TQ21NE126	527016	118284	0.70	East	Topsoil	0.45
					Made Ground	1.05
TQ21NE127	527014	118315	0.71	East	Topsoil	0.30
					Made Ground	1.20
TQ21NE129	527022	118324	0.71	East	Topsoil	0.35
					Made Ground	0.75
					Weald Clay	0.30
TQ21NE31	527038	118355	0.72	East	Topsoil	0.50
					Weald Clay	4.50
TQ21NE2/A	525720	118830	0.69	Northwest	Made Ground	0.30
					Weald Clay	39.32
TQ21NE2/B	525760	118990	0.83	Northwest	Weald Clay	40.23

Topsoil has been recorded to be of between 0.30-0.50m thickness in the area surrounding the subject site, with an average thickness of 0.40m. In the absence of any on-site soil records it is considered reasonable to assume that on-site Topsoil thickness is likely to be 0.40m.

Significant thicknesses of Made Ground are not expected to be encountered on the subject site and have therefore not been considered further.

The base of the Weald Clay was not encountered in any of the borehole records within 1km of the subject site. The BGS Geological Map for the area (Sheet 318/333) indicates that the Weald Clay Formation is of an approximate thickness of at least 200m in the area of the subject site.

#### 4.3 Groundwater Conditions

No groundwater strikes are recorded on any BGS borehole records within 1km of the subject site. Given the Weald Clay Formation is designated as unproductive strata it is considered that groundwater is unlikely to be present in the near-surface soils and is therefore not considered to present a significant limitation to mineral extraction.

## 5 VIABILITY OF MINERAL DEPOSIT

The site is located within a Minerals Safeguarding Area for the recovery of brick clay. Given the size of the proposed development and the size of the minerals resource area, it is likely that the proposed development will sterilise underlying mineral and has the potential to impact the viability of surrounding mineral resources.

As a rule of thumb, it is generally accepted that the quality of mineral and its intended end use will influence the quantities needed to make the mineral of commercial interest. Quantities of 10,000 to 100,000 tonnes of mineral resource may be viable (though possibly as low as 1,000 tonnes may be viable for some high value minerals), with quantities over 100,000 tonnes likely to be viable and so represent a mineral resource with a likely commercial interest.

However, to be commercially viable and warrant the opening of a new site including infrastructure, a minerals operator industry would normally require a reserve of at least 1Mt to offset the costs associated with the opening a new site (including planning and Environmental Impact Assessment, site preparation, infrastructure including processing facilities, operational costs, etc.)

### 5.1 Potentially Workable Area

The subject site covers a total area of 42,000m<sup>2</sup> (4.2ha). However, this is the entirety of the site area up to and including the site boundaries which are located in close proximity to pre-established land uses and a public right of way which crosses the site which is understood to be retained in the proposed development. For the purposes of this assessment we have assumed that the public right of way will be diverted during the development phase and reinstated once the development is completed.

If the underlying mineral resource were to be fully excavated then it is considered that no-dig “buffer zones” would be required to protect the amenity of the residential buildings bordering the site to the east, commercial buildings to the southeast and to maintain the structural integrity of site boundaries to the north and west and the public highway to the south with such standoff zones resulting in a decrease in the potentially workable area.

The MLP does not provide guidance on the size of appropriate Buffer Zones that should be applied when considering mineral extraction. Site constraints and adopted standoff zones are discussed in Sections 5.3 and 5.4.

### 5.2 Quality of Mineral

There is no on-site investigation data available for the subject site. However, the site is mapped to be underlain by the Weald Clay Formation with no superficial overburden (other than Topsoil). The Weald Clay Formation is readily used in the local brick-making industry and is not considered likely to fluctuate in composition to the extent that it would affect the overall quality of the mineral deposit.

As set out in Section 4.2, based on local borehole logs the overburden of Topsoil is considered to have an average thickness of 0.40m which has been assumed for the purposes of this assessment.

### 5.3 Site Constraints

Omnia has undertaken a review of potential constraints to mineral extraction at the Site. This included a review of physical constraints in the form of built development and adjoining property boundaries, services (underground and overground), and environmental designations.

These constraints have the potential to reduce the potential area of the site available for prior extraction of the mineral resource and appropriate buffer zones have been applied as set out in Section 5.4.

At this stage potential environmental constraints, such as noise, air quality and transport, have not been assessed.

#### 5.3.1 Proximity of Other Developments

As set out in Section 3 the east of the site is bound to the northeast by a new residential housing development and to the east by the King Business Centre. The west of the site is bound by an undeveloped plot of presumed agricultural land which separates the site from industrial/commercial properties to the west.

#### 5.3.2 Highways

As set out in Section 3 the site is bound to the south by Reed's Lane, a minor road, which will require an appropriate “buffer zone” to be applied to its northern boundary to ensure that the structural integrity of the road boundary is maintained.

### 5.4 Buffer Zones

West Sussex County Council does not provide guidance with regards to appropriate “buffer zones” between mineral extraction sites and residential, commercial or other property boundaries. However, for comparison, Hampshire County Council reference applying a 100m buffer zone to sensitive residential land use with this reviewed on a case-by-case basis.

For the purposes of this MRA, Omnia have adopted the following buffer zones:

1. A minimum buffer zone of 50 metres from the nearest neighbouring residential property boundary (garden). We have adopted a buffer zone of 30 metres along the remaining boundaries, which includes neighbouring agricultural land, commercial land use and the public highway.

Assuming the maximum site area, including the area of proposed public open space in the western part of the site, is used for the recovery of potential mineral resources (4.2ha), the applied standoff zone will decrease the area of potential recovery to approximately 14,250m<sup>2</sup> (1.425ha).

Notwithstanding the above, it is generally accepted that site areas of less than 3ha are unlikely to prove commercially viable.

## 5.5 High Level Resource Estimate

### 5.5.1 Whole Site Assessment

The following section assumes that 100% of the Weald Clay Formation mineral resource is deemed to be commercially suitable for extraction and could be extracted from within the workable site footprint (42,000m<sup>2</sup>).

Based on the limited size of the site, it has been assumed that any mineral extraction would be done as a single lift and therefore the maximum extraction depth is assumed to be limited by the maximum safe dig depth of a 30 tonne excavator (approximately 7m).

However, a single lift dig depth of 7m bgl will be subject to the underlying ground conditions proving to be suitably stable. If ground conditions are not sufficiently stable then this would either require the dig depth to be reduced or for the excavation to be battered back and the excavation undertaken as multiple lifts with the multi-level working platforms obviously having the potential to further decrease the area available for extraction.

Based on an assumed maximum dig depth of 7m bgl, and an average overburden thickness of 0.40m, the expected overburden to mineral ratio is approximately 5%.

Published values for the bulk density of the Weald Clay are in the order of 1.0-1.3 t/m<sup>3</sup>, and for Topsoil are in the order of 1.1-1.6 t/m<sup>3</sup>.

If the entire site footprint (42,000m<sup>2</sup>) was excavated to a maximum depth of 7m bgl following the removal of 0.40m of Topsoil overburden, this would result in a potential mineral volume of 277,200m<sup>3</sup> and an overburden volume of 16,800m<sup>3</sup>.

Applying an estimated bulk density of 1.3t per cubic metre equates to a gross resource of 360,360 tonnes of potential brick clay recovery.

Topsoil overburden tonnage is estimated at 26,880 tonnes.

### 5.5.2 Potential Extractible Area Assessment

As previously stated, the above assumes that the entirety of the site area is to be worked. However, once the 50m and 30m no-dig buffers set out in Section 5.4 are applied, the workable area reduces to 14,250m<sup>2</sup>.

This reduces the potential aggregate volume to 94,050m<sup>3</sup> and potential overburden volume of 5,700m<sup>3</sup> with a potential mineral tonnage of 122,265 tonnes.

It should be noted that at this stage processing losses have not been taken into account and given the limited size of the site it has been assumed that the resource will be recovered 'as-dug' and transported elsewhere for processing.

## 6 VIABILITY OF SITE AS A MINERAL RESOURCE

The following sections consider the viability of mineral extraction at the site either through prior extraction or opportunistic extraction in line with policies outlined by the MLP which seeks to maximise the quantities of minerals recovered and reduce the volume of mineral that could be sterilised by the proposed development.

### 6.1 Prior Extraction

This Phase I Mineral Resource Assessment has identified the potential presence of brick clay reserves beneath the site. Based on an assumed maximum dig depth of 7m bgl a potential tonnage of 360,360t (277,200m<sup>3</sup>). However, the proximity of the site to neighbouring residential properties, neighbouring land uses and the public highway will require the implementation of no-dig buffer zones, which at this stage have been set at 50m for residential property boundaries and 30m for all other boundaries including the public highway.

Discounting areas within the buffer zones reduces the potential aggregate tonnage to 122,265t (94,050m<sup>3</sup>).

To be commercially viable for a self-contained site, a mineral operator would generally require a mineral reserve in excess of 1Mt to offset the costs associated with setting up a new site (planning/EIA/site preparation/infrastructure/processing facilities, etc).

Therefore, given the estimated reserve volumes it is considered likely that mineral won from the site would have to be sold 'as raised' to a third-party operator which is likely to result in a far lower selling price per tonne.

A review of the MLP indicates that the site is approximately 12.5km (straight line distance) from the closest existing brick clay quarry at Ibstock Brick, Chailey. With the cost of haulage to a third-party processing plant is taken into account, it is likely that it would be uneconomic to extract on an 'as raised' basis.

Furthermore, surface working of the minerals, which is plausible given the shallow depth, would alter site levels and require the import of fill post-extraction to facilitate the residential re-development of the site.

Therefore, it is concluded that due to the limited potential reserve volume present that it is unlikely to prove economically viable to undertake prior extraction. Furthermore, the likely timescales involved in bulk excavation of the limited mineral resource, subsequent infilling of the site with geotechnically suitable development platforms, and then development of the site as housing, are considered likely to delay the proposed development beyond the scope of the current District Plan (2021-2039) in which the subject is allocated for housing.

### 6.2 Incidental Extraction

Given the shallow depth of Topsoil (0.40m) it is considered that volumes of brick clay mineral will be extracted during preparatory works for the development including foundations, footings, drainage, roads and landscaping works, although the volumes are considered likely to be minimal, particularly when it is taken into account that much of the west of the site is proposed to comprise areas of Public Open Space (POS) that are unlikely to see significant working.

If the site-won material proves suitable then it could be recovered for re-use in the development as part of any required earthworks or raising of levels.

However, opportunistic extraction could encourage a reduction in waste material removed from the site in addition to decreasing the volume of imported on-to site from elsewhere.

At this stage the potential volume of material likely to be yielded during the formation of trenches, footings, roads and landscaping cannot be quantified.

Any re-use of materials on site would need to be completed in accordance with the Definition of Waste Code of Practice (DoWCoP) process for materials re-use.

## 7 CONCLUSION

As set out in Section 1.5, a review of the West Sussex MLP indicates that the site is within a Mineral Safeguarding Area relating to brick clay associated with the Weald Clay mapped to underlie the site.

Mid Sussex District Council have set out that a Mineral Resource Assessment is required to support the proposed development at the subject site to assess the potential for workable mineral deposits beneath the site to avoid the possibility of mineral sterilisation.

The site is underlain by bedrock strata of the Weald Clay Formation which is generally considered to be a brick clay of potential economic interest due to its use in brick making.

Given the small size of the reserve, and limited size of the site, is considered unlikely that the site would prove economically viable as a standalone site with processing plant and as such the material would need to be transported “as raised” to a third-party processing site which significantly reduces the economic value of the underlying mineral.

Notwithstanding the above, Policy M9 of the MLP is applicable to the site.

Under Policy M9, non-mineral development proposals within a MSA will be permitted providing:

- 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.*

With respect to criteria (ii) and (iii) of policy M9 the following conclusions have been drawn:

***ii. It is appropriate and practicable to extract minerals prior to development taking place.***

Prior extraction of the mineral at this site is not considered viable.

Due to the volume of the resource and limited site size it is considered likely that mineral would need to be transported off site to a local established mineral operator for processing and therefore use of the extracted material as an aggregate is considered unlikely.

Furthermore, the likely timescales involved in bulk excavation of the limited mineral resource, subsequent infilling of the site with geotechnically suitable development platforms, and then development of the site as housing, are considered likely to delay the proposed development beyond the scope of the current District Plan (2021-2039) in which the subject is allocated for housing.

***(iii) – It has been demonstrated that prior extraction is not practicable***

This report demonstrates that the potential brick clay resource beneath the site is likely to be uneconomic due to the limited size of the site, and the constraining effect of residential dwellings

and a public highway in close proximity which will require the implementation of no-dig buffers which will reduce the potential available resource to approximately 94,050m<sup>3</sup> or 122,265t.

However, whilst the bulk extraction of the underlying mineral resource is not considered to be practicable, in order to prevent total sterilisation of the underlying mineral resource, it is recommended that the re-use of site-won materials for the purposes of construction should be practicable subject to the excavated soils being suitable for the intended use.

Incidental extraction will be possible given the shallow resource depth (overburden thickness estimated at 0.40m) during the preparatory works required for the proposed development such as the formation of foundations and footings or landscaping works associated with the development.

The most likely potential would be to re-use the materials on-site for general fill and selected end uses such as capping material.

The logistics for undertaking the construction works to enable the beneficial re-use during the phased residential development of the site could be set out in a Minerals Recovery Strategy to be agreed with West Sussex County Council as Mineral Planning Authority and secured by planning condition.

Therefore, it is recommended that consideration is given to the re-use of site-won materials for the purposes of construction under a DoW CoP MMP

## **APPENDIX I - LIMITATIONS**

1. This report and its findings should be considered in relation to the terms of reference and objectives agreed between Omnia and the Client as indicated in Section 1.2.
2. For the work, reliance has been placed on publicly available data obtained from the sources identified. The information is not necessarily exhaustive and further information relevant to the site may be available from other sources. When using the information, it has been assumed it is correct. No attempt has been made to verify the information.
3. This report has been produced in accordance with current UK policy and legislative requirements for land and groundwater contamination, which are enforced, by the local authority and the Environment Agency. Liabilities associated with land contamination are complex and requires advice from legal professionals.
4. During the site walkover reasonable effort has been made to obtain an overview of the site conditions. However, during the site walkover no attempt has been made to enter areas of the site that are unsafe or present a risk to health and safety, are locked, barricaded, overgrown, or the location of the area has not been made known or accessible.
5. Access considerations, the presence of services and the activities being carried out on the site limited the locations where sampling locations could be installed and the techniques that could be used.
6. Site sensitivity assessments have been made based on available information at the time of writing and are ultimately for the decision of the regulatory authorities.
7. Where mention has been made to the identification of Japanese Knotweed and other invasive plant species and asbestos or asbestos-containing materials this is for indicative purposes only and do not constitute or replace full and proper surveys.
8. The executive summary, conclusions and recommendations sections of the report provide an overview and guidance only and should not be specifically relied upon without considering the context of the report in full.
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10. New information, revised practices or changes in legislation may necessitate the re-interpretation of the report, in whole or in part.

## **APPENDIX II – GLOSSARY**

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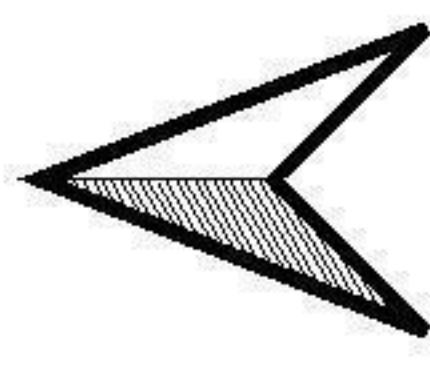

AST	Above Ground Storage Tank
BGS	British Geological Survey
BSI	British Standards Institute
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes
CIEH	Chartered Institute of Environmental Health
CIRIA	Construction Industry Research Association
CLEA	Contaminated Land Exposure Assessment
CSM	Conceptual Site Model
DNAPL	Dense Non-Aqueous Phase Liquid (Chlorinated Solvents, PCB)
DWS	Drinking Water Standard
EA	Environment Agency
EQS	Environmental Quality Standard
GAC	General Assessment Criteria
GL	Ground Level
GSV	Gas Screening Value
HCV	Health Criteria Value
ICSM	Initial Conceptual Site Model
LNAPL	Light Non-Aqueous Phase Liquid (Petrol, Diesel, Kerosene)
ND	Not Detected
LMRL	Lower Method Reporting Limit
NR	Not Recorded
PAH	Polycyclic Aromatic Hydrocarbon
PCB	Poly-Chlorinated Biphenyl
PID	Photo-Ionisation Detector
QA	Quality Assurance
SGV	Soil Guideline Value
SPH	Separate Phase Hydrocarbon
TPH (CWG)	Total Petroleum Hydrocarbon (Criteria Working Group)
SPT	Standard Penetration Test
SVOC	Semi Volatile Organic Compound
UST	Underground Storage Tank
VCCS	Vibro Concrete Columns
VOC	Volatile Organic Compound
WTE	Water Table Elevation

#### UNITS

M	Metres
KM	Kilometres
%	Percent
%V/V	Percent Volume in Air
MB	Milli Bars (Atmospheric Pressure)
L/HR	Litres Per Hour
µG/L	Micrograms Per Litre (Parts Per Billion)
PPB	Parts Per Billion
MG/KG	Milligrams Per Kilogram (Parts Per Million)
PPM	Parts Per Million
MG/M <sup>3</sup>	Milligram Per Metre Cubed
M BGL	Metres Below Ground Level
M BCL	Metres Below Cover Level

MAOD                    Metres Above Ordnance Datum (Sea Level)  
KN/M<sup>2</sup>                Kilo Newtons Per Metre Squared  
µM                      Micrometre

### **APPENDIX III - DRAWINGS**



## Site Boundary

key

0 1 2 km

Scale	Paper Size
1:45,000	A4

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Job Title:  
Land at Reeds Lane  
Common

**Client:**  
**Reside Holdings Ltd**

Project Number: A12568

Date: 14/11/2025

**Drawing Title:**  
**Figure 1.0**  
**Site Location Map**

# Key



0 50 100 m

Scale 1:2,250 Paper Size A4

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Land at Reeds Lane, Sayers Common

Client:  
Reside Holdings Ltd

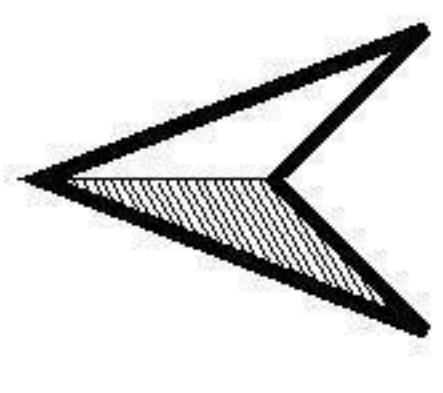
Project Number:  
A12568

Date:  
14/11/2025

Drawing Title:  
Figure 2.0  
Proposed Site Development Plan

Authorised By:  
W. Bennett

Drawn By:  
D. Shah



## Key

- Weald Clay Formation
- Site Boundary

0 50 100 m



Scale  
1:3,000

Paper Size  
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
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Project Number: A12568	Date: 17/11/2025
Drawn By: D. Shah	Authorised By: W. Bennett
Client: Reside Holdings Ltd	Drawing Title: Figure 3.0 Map of Site Geology

## Key

- Site Boundary
- BGS BH Records
- 1Km Buffer



0 250 500 m

Scale 1:15,000 Paper Size A4

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Authorised By:	W. Bennett

Client:  
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Drawing Title:  
Figure 4.0  
Location of BGS Boreholes

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