



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

TO:	Mid Sussex District Council Case Officer: Mr S Davis
DATE:	19/06/2020
LOCATION:	Land west of Fontwell Avenue, Fontwell Avenue, Eastergate, PO20 3RX
SUBJECT:	BN/50/20/PL Demolition of existing structures on-site & erection of 42 No. dwellings with access, parking, landscaping & associated works. This application is a Departure from the Development Plan.
RECOMMENDATION:	☒ Advice ☐ Objection ☐ Modification ☒ No Objection ☐ More Information ☐ Refusal

Joint Minerals Local Plan (2018)

The proposed development site is located within an identified safeguarding area for Sharp Sand and Gravel and the proposed development would sterilise the mineral resource. As the application site is over 0.5ha in size and proposes a residential development in excess of 10 dwellings, the Joint Minerals Local Plan (2018) Policy M9 and associated Safeguarding Guidance (Updated February 2020) is relevant.

The applicant has submitted a Mineral Resource Assessment that includes a quantitative and qualitative assessment of the potential resource based on borehole data.

This concludes that sand and gravel underlying the site has a high clay content, would require considerable processing, and thus is of a poor quality/unattractive for use by the mineral industry. It also suggests that any substantive prior extraction of the mineral would require backfilling, which economically/technically would likely render the site unsuitable for the proposed non-mineral development. With regard to any incidental prior extraction, it is noted that the mineral resource is unlikely to be suitable for use without further (off-site) processing.

Although environmental feasibility of prior extraction has been given limited consideration (e.g. potential impacts upon the water environment/ecology/neighbouring amenity), given the limited quantity of the resource at the site (< 50,000 Tonnes), limited size of site that could not support



the required processing infrastructure (< 2ha), and poor quality of the material (high clay content), prior extraction is unlikely to be practicable.

Irrespective of the above, mineral sterilisation will occur as a result of the non-mineral development. Although prior extraction for this site in isolation would unlikely be practicable in this case, the determining authority will need to be satisfied that there is an overriding need for the non-mineral development that outweighs the safeguarded resource as per Policy M9 (b) (iii) of the JMLP (2018).

Should the overriding need not be demonstrable then the MWPA would be open to discussing a condition or informative to securing prior/incidental extraction at the site where practicable, and would seek to work with the applicant in securing this.

West Sussex Waste Local Plan (2014)

The application site is located within close proximity of an existing safeguarded scrap vehicle waste infrastructure (Sussex Recovery) which operates some 350m to the south of the site, beyond existing housing. The decision maker should be satisfied that the proposed development would not prevent or prejudice the operation of this existing waste infrastructure as per Policy W2 of the WSWLP (2014).

The decision maker should also be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Edward Anderson

