



# Gatwick Airport Northern Runway Project

Environmental Statement  
Appendix 10.9.2: Mineral Resource Assessment

**Book 5**

VERSION: 1.0

DATE: JULY 2023

Application Document Ref: 5.3

PINS Reference Number: TR020005

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## 1 Introduction

- 1.1.1 This document forms Appendix 10.9.2 of the Environmental Statement (ES) prepared on behalf of Gatwick Airport Limited (GAL) for the proposal to make best use of Gatwick Airport's existing runways and infrastructure (referred to within this report as 'the Project').
- 1.1.2 This document provides the Mineral Resource Assessment (MRA) for the Project. An MRA is required in support of the Project given its position above a Mineral Safeguarding Area (MSA) as defined by the county Mineral Planning Authorities (MPAs) most notably of West Sussex County Council.

## 2 Methodology

- 2.1.1 This MRA evaluates the potential for the sterilisation of safeguarded mineral resources by the Project, based on a consideration of the existing development, the Project proposals, and the geological setting.
- 2.1.2 The significance of potential resource sterilisation is assessed against the relevant national and local policy framework and guidance as described in:
- [Airports National Policy Statement, Department of Transport](#) (June 2018)
  - [National Policy Statement for National Networks, Department of Transport](#) (December 2014)<sup>1</sup>
  - [West Sussex Joint Minerals Local Plan](#) produced by West Sussex County Council Mineral Planning Authority (WCC MPA)
- 2.1.3 Where necessary, mitigation measures would be proposed to meet the requirements of these national and local policy requirements, along with consultation with the relevant MPAs.

## 3 Project details

- 3.1.1 All boundaries relevant to the Project and mineral planning policies are shown in Figures 1 and 2. These figures include the Project site boundary, the Gatwick Airport title boundary and the relevant county administrative boundaries.
- 3.1.2 The Project site boundary is almost entirely contained within existing title boundary of Gatwick Airport, which, in turn, is located within the administrative area of West Sussex County Council (WSCC). Small areas along northern Project site boundary extend outside of the Gatwick Airport title area and into the administrative area of Surrey County Council (SCC). This is most notable along the airport access roads that follow the north eastern boundary of the Project site.
- 3.1.3 The Gatwick Airport title area is located in the borough authority area of Crawley Borough Council (within WSCC). However, the northern extension of the boundary of the Project site results in small areas being situated within the Mole Valley District Council and Reigate and Banstead Borough Council authority areas.
- 3.1.4 The Project includes the following key components:
- amendments to the existing northern runway including repositioning its centreline 12 metres further north to enable dual runway operations;
  - reconfiguration of taxiways;
  - pier and stand alterations (including a proposed new pier);
  - reconfiguration of other airfield facilities;
  - extensions to the existing airport terminals (north and south);
  - provision of additional hotel and office space;
  - provision of reconfigured car parking, including new car parks;
  - surface access (including highway) improvements;
  - demolition and relocation of Central Area Recycling Enclosure (CARE) facility;
  - water treatment facilities;
  - reconfiguration of existing utilities, including surface water, foul drainage and power; and
  - landscape/ecological planting and environmental mitigation.

- 3.1.5 Given the developed nature of Gatwick Airport, most of the proposed works involve modification to pre-existing infrastructure within the Gatwick Airport title area. The only construction activities to be undertaken in currently undeveloped areas of the Project site are associated flood and water storage areas and the management of highway runoff. These areas are shown in Figure 3 and include:
- the Museum Field flood compensation area situated on the north western boundary of the Project site that includes up to approximately 90,000m<sup>3</sup> of excavation (Surface area c. 29,000 m<sup>2</sup>);
  - small waterbodies and associated drainage ditches along the north eastern highway scheme (Surface area c. 12,000 m<sup>2</sup>); and
  - River Mole diversion (Surface area c. 30,000 m<sup>2</sup>).
- 3.1.6 Museum Field and the River Mole diversion areas are located within the administrative areas of WSCC, whereas the highway drainage features are located in SCC. The total surface area of these three areas is estimated to be c. 71,000 m<sup>2</sup>.

## 4 Geological site setting

- 4.1.1 The regional bedrock and superficial geology relevant to the Project site is shown in Figure 1 and Figure 2. The Project site is underlain by bedrock of the Weald Clay Formation. The Weald Clay Formation is predominantly a mudstone unit with occasional, thin bands of ironstone. The Weald Clay Formation is locally overlain by superficial sand and gravel River Terrace Deposits (associated with the River Mole) and alluvium, the latter comprising a complex mixture of clays, silts, sands and gravels.
- 4.1.2 Previous intrusive investigations (as identified within **ES Appendix 10.9.1: Preliminary Risk Assessment** (Doc Ref. 5.3)) undertaken within the Project site boundary have confirmed the presence of superficial deposits of alluvium, head and River Terrace Deposits. These were associated with former and existing watercourses. The alluvium has been recorded as up to approximately 2.9 metres in thickness, with an average thickness of approximately 1 metre. Localised layers of peat were identified within these deposits. The River Terrace Deposits were reported

<sup>1</sup> The Department for Transport published a revised draft National Policy Statement for National Networks ("NPSNN") for consultation on 14 March 2023. The draft NPSNN confirms in paragraph 1.16 that the existing NPSNN remains the relevant government policy and has full force and effect in relation to any applicable applications for development consent accepted for examination before designation of the updated NPSNN. The draft NPSNN further notes in paragraph 1.17 that the emerging draft NPSNN is capable of being an important and relevant consideration in the Secretary of State's decision making process. As such, the Applicant will continue to monitor the progress of the NPSNN review process and incorporate any updates to the Project's application documentation where considered appropriate in due course.

to be up to 1.1 metres in thickness. Intrusive works also confirm the presence of Weald Clay Formation across the Project area, with a maximum proven depth of 35.5 metres. The Weald Clay Formation comprised mudstones and siltstones with an upper weathered horizon typically comprising a stiff clay.

4.1.3 A surface veneer of Made Ground has been encountered across most of the Project site reflecting the built-up nature of Gatwick Airport. Previous intrusive investigations suggest a typical thickness for Made Ground of less than 2 metres (average depth of c. 1 metre) with localised deeper Made Ground encountered at between 3 and 3.9 metres.

## 5 Mineral resources

### 5.1 Safeguarded mineral resources

5.1.1 The entire Project site of c. 812ha is located above a MSA defined for Brick Clay of the Weald Clay in the West Sussex County Council Joint Minerals Local Plan (JMLP) that was adopted on 20 July 2018 and detailed in Figure 4. Assuming the maximum depth of Weald Clay proven on the Project Site (ie 35.5m), this equates to c. 0.29km<sup>3</sup> of safeguarded Brick Clay within the Project Site boundary.

5.1.2 Approximately 11% (91 ha) of the 812ha total Project Site area is currently undeveloped. This undeveloped area principally relates to Zones 3 (River Mole Corridor) and 8 (Eastern Zone). This implies that approximately 91 ha of the undeveloped Project Site overlies the Brick Clay mineral resource of the Weald Clay Formation.

### 5.2 Potential sterilisation of safeguarded mineral resources on the Gatwick Site

5.2.1 The non-developed area of the Project Site is approximately 91 ha. If the maximum proven depth of the Weald Clay beneath the Project Site is applied, this would imply that approximately 0.03 km<sup>3</sup> of Brick Clay mineral resource is potentially available beneath the non-developed areas of the Project Site.

5.2.2 Mineral sterilisation would only occur from proposed development in currently undeveloped areas of the Project Site. The total surface area of those areas is estimated to be c. 71,000 m<sup>2</sup> which equates to a volume of 0.002km<sup>3</sup> assuming the full thickness of Weald Clay of 35.5m. Given there is a considerable volume of mineral resource potentially sterilised by the proposed development in undeveloped parts of the Project Site, a detailed mineral planning policy review has been undertaken to support the Project.

## 6 Mineral policy framework

### 6.1 National planning statements

6.1.1 Both the Airports NPS (Department for Transport 2018) and Networks NPS (Department for Transport 2014) state that an applicant should safeguard any mineral resources on a proposed site as far as possible<sup>2</sup>. Furthermore, where a preferred scheme has an impact on a MSA, the Secretary of State must ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.

6.1.2 With respect to mitigation in relation to land instability the NPSs identify ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource.

### 6.2 West Sussex County Council Mineral Planning Authority

6.2.1 Mineral planning policies and best practice within the West Sussex County Council Mineral Planning Authority (WCC MPA) area are outlined in the following documents:

- [West Sussex Joint Minerals Local Plan](#) (JMLP) adopted on 20 July 2018 that covers the period to 2033 and was subject to partial review in March 2021.
- [Minerals and Waste Safeguarding Guidance, March 2020](#) (MWSG, 2020).

6.2.2 In fulfilment of *Strategic Objective 5* of the JMLP (2018), Mineral Safeguarding Areas (MSAs) have been defined within West Sussex to protect potentially economically viable mineral resources. The location and extent of those MSAs are shown in the policy maps in *Appendix E* of the JMLP (2018) and are presented in Figure 4.

6.2.3 The Project site is situated above a MSA defined for Brick Clay, which represents the full extent of Weald Clay across West Sussex. This large MSA covers more than one third of the total county area. The Project site is not situated above any other MSA (including those defined for land-won aggregates).

6.2.4 It is stated in the JMLP (2018) that for the MPA in WSCC to raise *no objection* to a non-mineral development they would need to be satisfied that either “*mineral 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 “*there is an overriding need for the development*”. This position is captured by *Policy M9: Safeguarding Minerals* that is summarised in *Table 7.2.1*.

### 6.3 Surrey County Council Mineral Planning Authority

6.3.1 The Surrey Minerals Plan Core Development Plan Document (DPD) adopted in 2011 (Minerals Core DPD (2011)) outlines strategic mineral policies for the period up to 2026. Objective 2 of the Minerals Core DPD (2011) relates to safeguarding the supply of minerals most notably by:

- ensuring that important mineral resources and sites for mineral development are not sterilised by other development (O2.2); and
- ensuring prior extraction of mineral resources, where possible, if land is to be sterilised by other development (O2.3).

6.3.2 Strategic Objective 2 is principally delivered through ‘*Policy MC6: Safeguarding mineral resources and development*’ that requires the designation of MSAs. MSAs designated in Surrey are shown on SCC’s own [online map viewer](#). It is notable that unlike WSCC, the MPA for SCC do not designate the entire exposure of the Weald Clay Formation as the MSA for Brick Clay. The MPA for

<sup>2</sup> The Department for Transport published a revised draft National Policy Statement for National Networks (“NPSNN”) for consultation on 14 March 2023. The draft NPSNN confirms in paragraph 1.16 that the existing NPSNN remains the relevant government policy and has full force and effect in relation to any applicable applications for development consent accepted for examination before designation of the updated NPSNN. The draft NPSNN further notes in paragraph 1.17 that the emerging draft NPSNN is capable of being an important and relevant consideration in the Secretary of State’s decision making process. As such, the Applicant will continue to monitor the progress of the NPSNN review process and incorporate any updates to the Project’s application documentation where considered appropriate in due course.

SCC has instead designated smaller MSAs typically around sites of current or historical mineral extraction. None of the Project site that extends into the administrative area of SCC is situated near (or on) designated MSAs in the SCC administrative area.

6.3.3 It is noted that SCC has recently completed a [consultation exercise](#) for their emerging 'Minerals and Waste Local Plan for Surrey' that will provide the updated minerals and waste planning framework for a period of 15 years. Two options were considered with respect to mineral safeguarding and that consultation exercise concluded:

- 60% chose Option 1 "An approach broadly consistent with Policy MC6 of the Surrey Minerals Plan 2011 by retaining Minerals Safeguarding Areas as currently defined."
- 40% chose Option 2 "An approach that provides for the safeguarding of the County's remaining reserves of potentially exploitable mineral resources in terms of: sharp sand and gravel; soft sand (outside the Surrey Hills Area of Outstanding Natural Beauty); brick clay; and silica sand. Minerals Safeguarding Areas would be defined based on the geological resource as identified by the British Geological Survey.

## 7 Mineral planning policy assessment

### 7.1 National policy statements (Airports and Networks)

7.1.1 By ensuring that surplus safeguarded minerals excavated in undeveloped areas of the Project site are exported off-site for sale (subject to third party agreement), or reuse, under the Materials Management Plan (see **ES Appendix 5.3.2: Construction Resources and Waste Management Plan** (Doc Ref. 5.3), the requirement of the NPSs to 'safeguard any mineral resources on a proposed site as far as possible' would be met.

7.1.2 The proposed management of incidental mineral extraction would therefore represent the 'appropriate mitigation measure' required by the NPSs with respect to MSA - given mineral planning policy of WSCC MPA - and this is to be taken forward under the Materials Management Plan (see **ES Appendix 5.3.2: Construction Resources and Waste Management Plan** (Doc Ref. 5.3).

### 7.2 Surrey County Council MPA

7.2.1 In the absence of any MSAs near areas of the Project that extend into Surrey, it is considered that there is no issue with respect to mineral resource sterilisation associated within the administrative area of SCC.

### 7.3 West Sussex County Council MPA

7.3.1 The West Sussex County Council MWSG (2020) sets out 'consultation thresholds' that dictate when the MPA in WSCC should be consulted about non-mineral development. Ten consultation exemptions are defined in that guidance. The most notable exemption in relation to the Project is for "applications for development and extensions to existing buildings within the curtilage of existing development (residential and commercial)". Given that the Project site within West Sussex is entirely situated within the existing Gatwick Airport title boundary and construction activities are largely within developed parts of the Project site it is considered the development should be exempt from mineral safeguarding by virtue of the 'below 3 hectare' area consultation threshold for non-residential development within the Weald Clay Mineral Consultation Area.

7.3.2 An assessment against *Policy M9: Safeguarding Minerals* has been undertaken and is summarised in *Table 7.2.1*.

7.3.3 It has been shown that safeguarded mineral resources (Brick Clay) will be sterilised beneath the footprint of those construction areas situated outside of the currently developed areas of the Project site. Those areas relate to flood and water storage areas and the management of highway runoff.

7.3.4 It is considered that the overriding need for this development will outweigh the safeguarding of the Brick Clay (Policy M9(b)(iii) in *Table 7.2.1*), given:

- the national importance of the development; and
- the very large size of the MSA defined for Brick Clay, covering more than one third of the entire county area of West Sussex.

7.3.5 However, initial construction assessments have shown that a significant volume of surplus material will be generated in excavations that are proposed in undeveloped areas of the Project site, most notably:

- the museum field flood compensation area situated on the north-western boundary of the Project site (that includes approximately 90,000m<sup>3</sup> of excavation);
- the small waterbodies and associated drainage ditches along the north-eastern highway scheme; and
- the River Mole diversion area.

7.3.6 The spoil strategy for the Project will inform the development of the materials management plan (see **ES Appendix 5.3.2: Construction Resources and Waste Management Plan** (Doc Ref. 5.3) for the construction phase. Where surplus cohesive, safeguarded Brick Clay of the Weald Clay Formation is generated during construction and cannot be retained on site, it would be exported for reuse offsite. Preliminary calculations suggest the volume of safeguarded Brick Clay generated in these areas may be of commercial interest to local brick manufactures (ie > 50,000m<sup>3</sup>) subject to quality testing.

7.3.7 It is therefore considered that the potential sterilisation of safeguarded mineral resources on the Project site can be mitigated by a commitment to ensure surplus Brick Clay excavated in these areas would be exported off-site for sale (subject to third party agreement) or reuse. The re-use of safeguarded mineral resource would constitute an 'appropriate and practicable level of prior extraction' on this nationally important development, as required by *Policy M9: Safeguarding Minerals*. On this basis no objection would be expected from WSCC MPA in relation to mineral planning policy, most notably *Policy M9: Safeguarding Minerals*.

**Table 7.2.1: Position regarding Policy M9: Safeguarding Minerals (West Sussex JMLP 2018)**

Policy	Policy Position
(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.	There are no existing mineral extraction sites or Mineral Consultation Areas associated with such sites in the vicinity of the Project site.
(b) Soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone	The Project Site is situated above MSA designated for brick-making clay of the Weald Clay Formation.

Policy	Policy Position
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 sterilization will not occur*; or  <i>(*Either because the mineral resources are not economically viable or that an appropriate and practicable level of prior extraction can take place)</i>	Mineral resources (Brick Clay of the Weald Clay Formation) are already sterilised within the Project site by the presence of existing structures and infrastructure associated with Gatwick Airport. Although the Project is permanent in nature and site-specific ground investigations have shown Weald Clay Formation to be present across the Project site, prior extraction is not considered practicable or appropriate given: <ul style="list-style-type: none"> <li>the majority of the proposed works are to be undertaken in developed areas of the airport;</li> <li>the high economic cost associated with any delay to project delivery; and</li> <li>the entire Project site within the West Sussex County Council area is situated within the Gatwick Airport title boundary.</li> </ul> Incidental mineral extraction is expected from excavations in certain localised areas of undeveloped land within the Project site, most notably in those areas to be used for water / flood storage. Surplus material that is not used on site during construction would be sent off-site for sale (subject to 3rd party agreement) or reuse elsewhere (where possible) under the Materials Management Plan (see <b>ES Appendix 5.3.2: Construction Resources and Waste Management Plan</b> (Doc Ref. 5.3)). This would constitute an appropriate and

Policy	Policy Position
	practicable level of prior extraction for this nationally important development.
(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	Given that most of the proposed construction works would be undertaken in developed areas of the airport and considering the high economic cost associated with any delay to project delivery, prior extraction is not considered appropriate or practicable in this instance. However, incidental mineral extraction is expected during excavations in certain localised areas of the Project, most notably in those areas to be used for water / flood storage. Any surplus material that is not reused on site during construction would be exported off-site for reuse elsewhere, where possible, under the Materials Management Plan (see <b>ES Appendix 5.3.2: Construction Resources and Waste Management Plan</b> (Doc Ref. 5.3)). This would constitute an appropriate and practicable level of prior extraction for this nationally important development.
(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 Project represents a development of national importance, that is contained within the Project site boundary, therefore the overriding need for this development is considered to outweigh the safeguarding of mineral resources. However, incidental mineral extraction will be managed as above.

### Consultation

- 7.3.8 A virtual meeting was held with the MPAs of WSCC and SCC on 10 November 2022. The policy positions outlined in *Table 7.2.1* were presented and the conclusions above were agreed with all parties.
- 7.3.9 In progression of these works, dialogue has also been opened with Wienerberger Ltd and Ibstock plc who operate brickworks within the county. Those communications relate to their interest in

receiving incidentally recovered minerals (Brick Clay) and that dialogue is ongoing.

## 8 Conclusion

- 8.1.1 Proposed construction activities in currently undeveloped areas of the Project site have been shown to sterilise safeguarded mineral resources of Brick Clay (of the Weald Clay Formation). Those mineral resources are principally protected by *Policy M9: Safeguarding Minerals* defined in West Sussex JMLP adopted in July 2018. Notwithstanding this, it is considered that WSCC MPA would not object to the Project on the grounds of mineral safeguarding, given that the need for this nationally important development would likely outweigh the safeguarding of the Brick Clay (which covers more than one third of the county).
- 8.1.2 It has been estimated that incidental mineral extraction during construction in undeveloped areas of the Project site could potentially produce a sufficient volume of safeguarded Brick Clay to be of commercial interest to local brick manufacturers, subject to quality testing.
- 8.1.3 A commitment to ensure that any surplus material (not reused on site during construction) is exported off-site for reuse elsewhere, would constitute a mitigation for sterilisation and this is to be taken forward under the Materials Management Plan (see **ES Appendix 5.3.2: Construction Resources and Waste Management Plan** (Doc Ref. 5.3)). This mitigation would meet the requirements of the NPSs in relation to MSA and would also constitute an 'appropriate and practicable level of prior extraction', as required by *Policy M9: Safeguarding Minerals*.

## 9 References

- Department for Transport (2018). Airports National Policy Statement
- Department for Transport (2014). National Policy Statement for National Networks.
- West Sussex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan adopted on 20 July 2018 that covers the period to 2033 and was subject to partial review in March 2021.

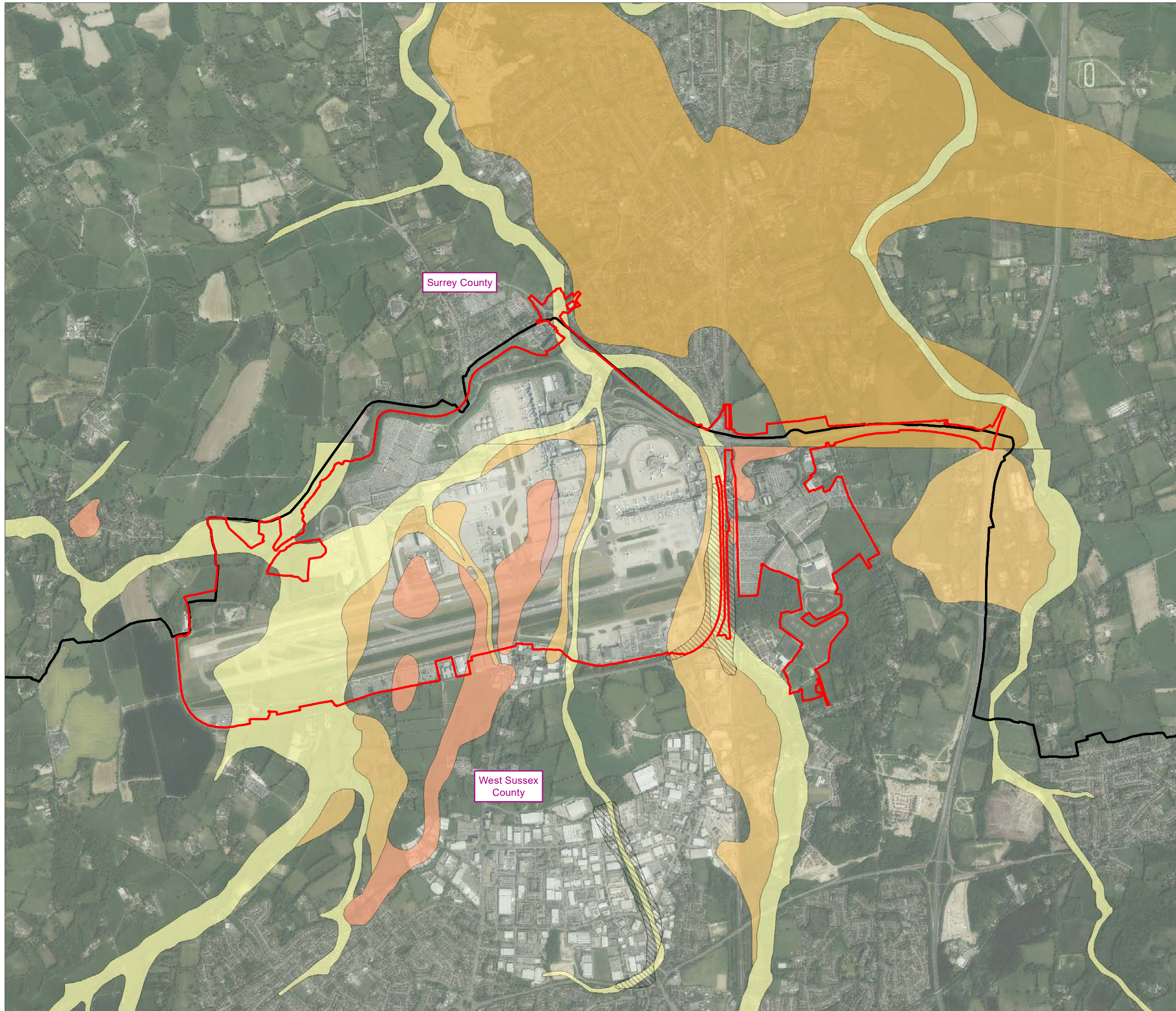
West Sussex County Council and South Downs National Park Authority (2020) Minerals and Waste Safeguarding Guidance, March 2020.

## 10 Glossary

### 10.1 Glossary of terms

**Table 10.1.1: Glossary of Terms**

<b>Term</b>	<b>Description</b>
DPD	Development Plan Document
JMLP	Joint Minerals Local Plan
MPA	Mineral Planning Authority
MRA	Mineral Resource Assessment
MSA	Mineral Safeguarding Area
NPS	National Policy Statement
SCC	Surrey County Council
WSCC	West Sussex County Council



**Legend**

- Project Site Boundary (ES)
- County Council Boundary
- Alluvium - Clay, silt, sand and gravel
- Head - Clay, silt, sand and gravel
- River Terrace Deposits (Undifferentiated) - Sand and gravel
- River Terrace Deposits, 1 (River Mole) - Sand and gravel
- River Terrace Deposits, 2 (River Mole) - Sand and gravel
- Made Ground - Artificial Deposit

DOCUMENT

Environmental Statement

DRAWING TITLE

Superficial Geology and Project Boundaries

DATE

January 2023

ORIENTATION



DRAWING NO.

FIGURE 1

REVISION

For ES Issue

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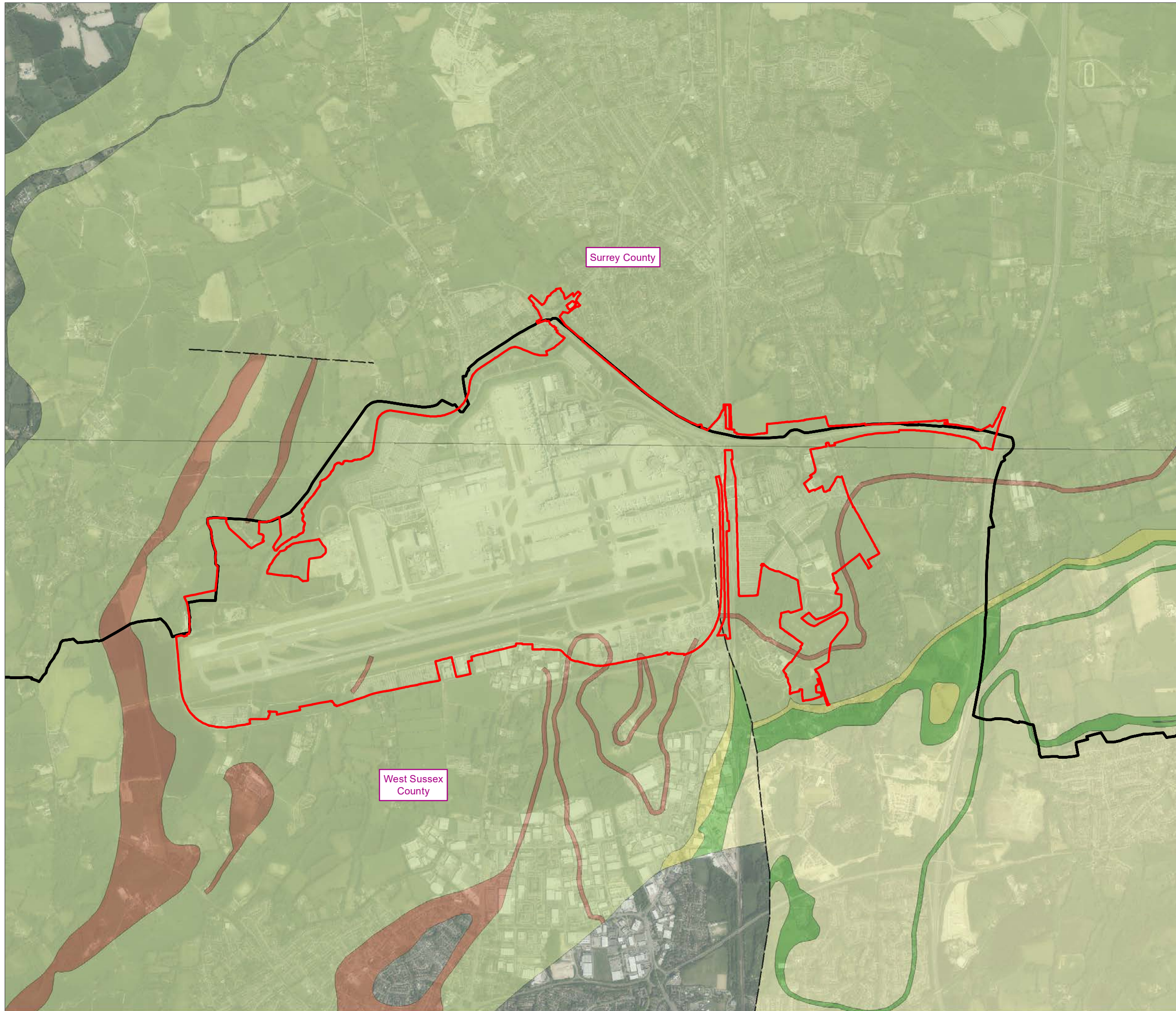
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**Legend**

- Project Site Boundary (ES)
- County Council Boundary
- Weald Clay Formation - Clay-ironstone
- Weald Clay Formation - Mudstone
- Upper Tunbridge Wells Sand - Mudstone
- Upper Tunbridge Wells Sand - Sandstone and mudstone
- Upper Tunbridge Wells Sand - Sandstone and siltstone, interbedded
- Fault Inferred, displacement unknown

DOCUMENT  
**Environmental Statement**

DRAWING TITLE  
**Bedrock Geology and Project Boundaries**

DATE  
**January 2023**

ORIENTATION 	DRAWING NO. <b>FIGURE 2</b>	REVISION <b>For ES Issue</b>
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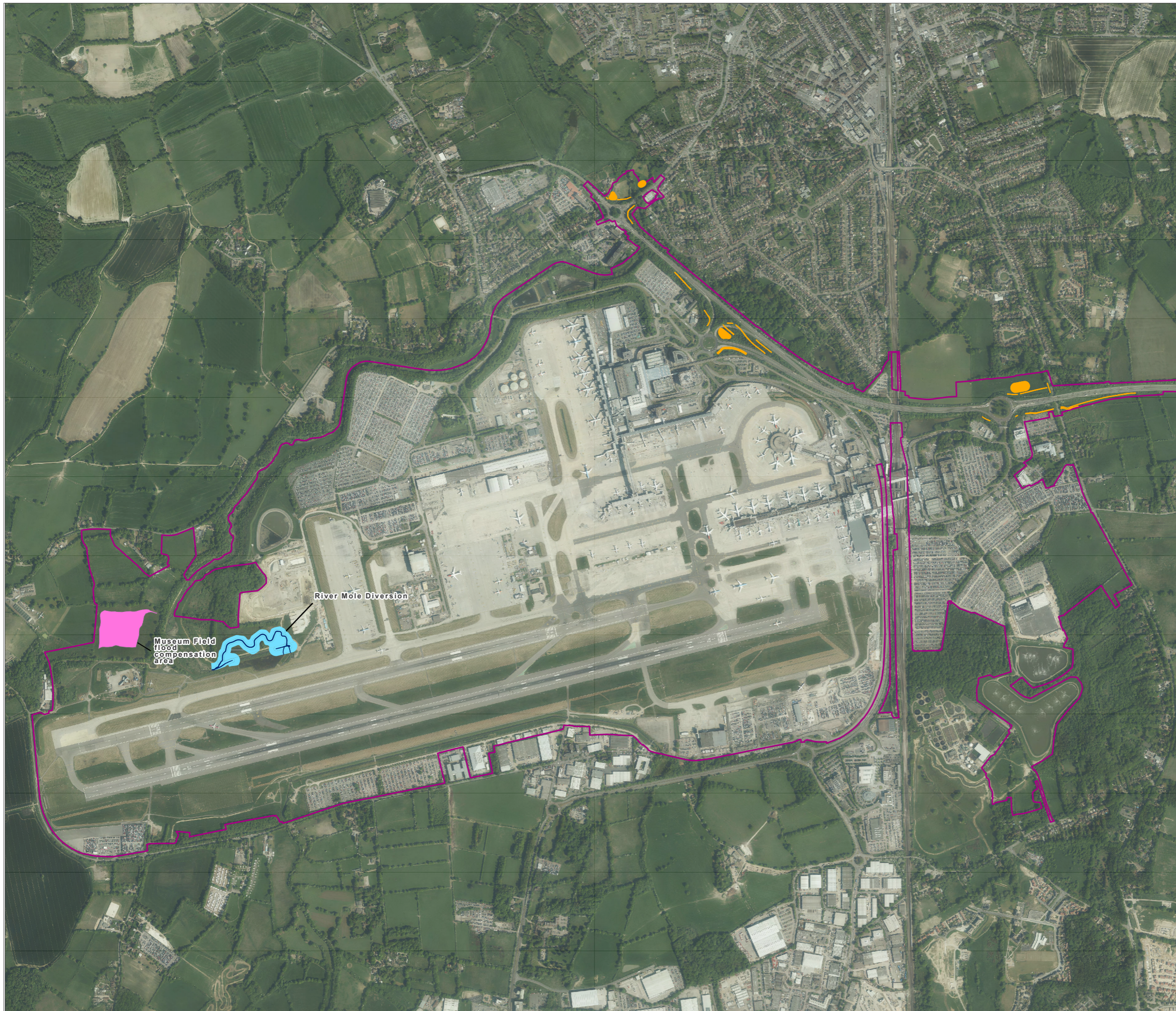
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KEY

- Project Site Boundary (ES)
- Flood compensation / Storage Areas
- River Mole Diversion
- River Mole Diversion - secondary channel
- Waterbodies and ditches for the highways scheme



DOCUMENT  
**Environmental Statement**

DRAWING TITLE  
**Excavations in undeveloped areas and water storage**

DATE  
**January 2023**

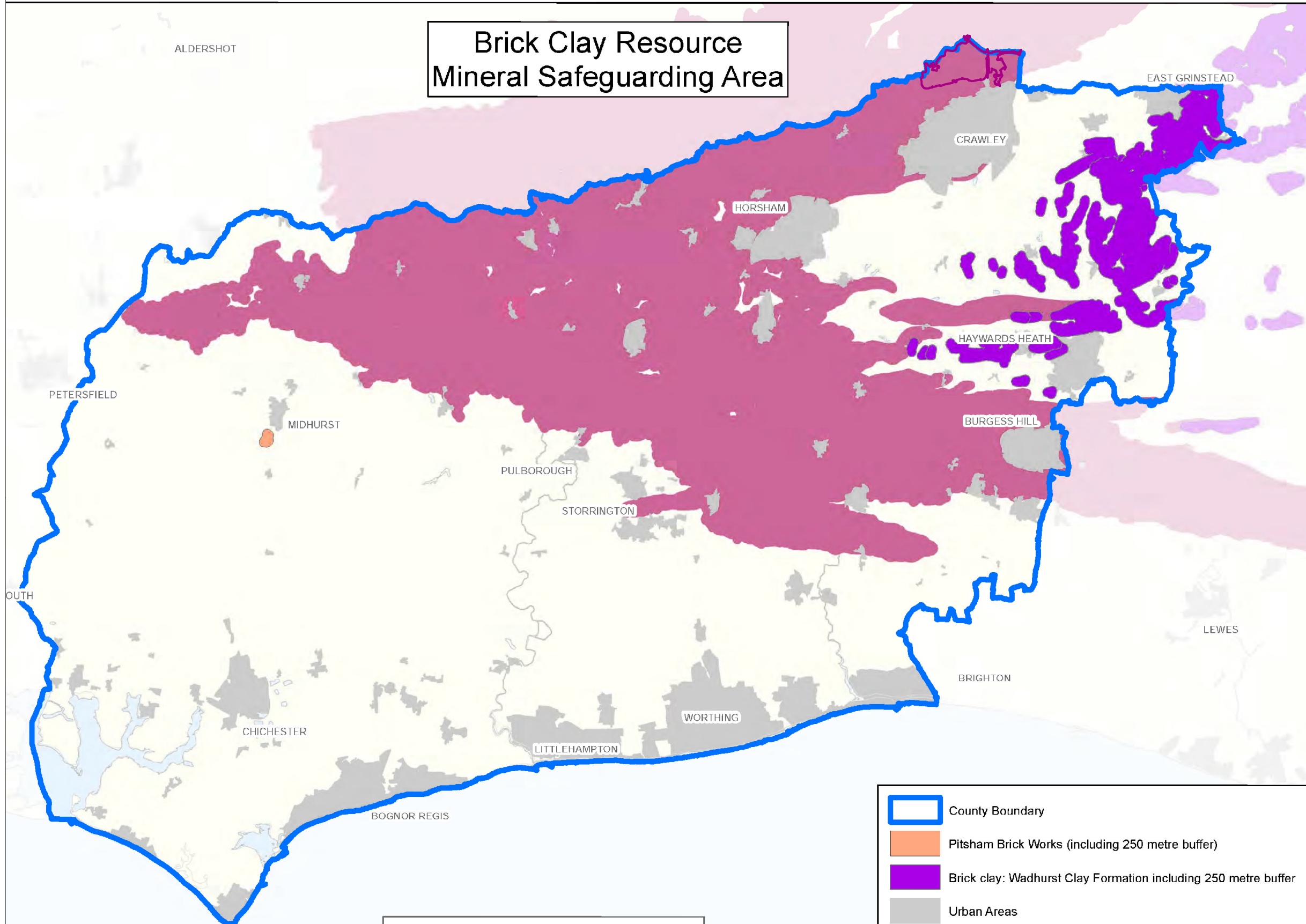
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# Brick Clay Resource Mineral Safeguarding Area

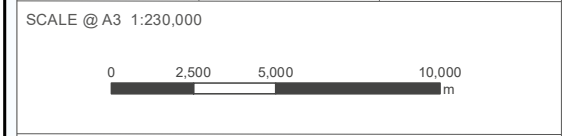


- KEY**
- Project Site Boundary (ES)
  - County Boundary
  - Pitsham Brick Works (including 250 metre buffer)
  - Urban Areas
  - Brick Clay: Weald Clay Formation including 250 metre buffer
  - Brick Clay: Wadhurst Clay Formation including 250 metres buffer

- County Boundary
- Pitsham Brick Works (including 250 metre buffer)
- Brick clay: Wadhurst Clay Formation including 250 metre buffer
- Urban Areas
- Brick clay: Weald Clay Formation including 250 metre buffer

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Environmental Statement		
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Mineral Safeguarding Area for Brick Clay (West Sussex County Council)		
DATE		
July 2023		
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