

# Addendum to the Sustainability Appraisal for the Soft Sand Review: SSR Modifications Consultation (October 2020)

## Contents

Introduction .....	2
The Sustainability Appraisal (SA) Process and Methodology .....	2
The SA Framework.....	3
Sustainability Appraisal Objectives and Subsidiary Questions.....	3
Social.....	3
Economic .....	3
Environmental.....	4
Appraisal of the Proposed Modifications .....	5
Screening and Summary Appraisals.....	5
Modifications to Policy M2 Recommendations.....	10
Modifications to Policy M11 Recommendations.....	10
Modifications to Policy M11 and Development Principles for each Site Allocation .....	11
Cumulative impact of sites.....	12
Next steps.....	12

## Introduction

This document assesses the Proposed Modifications to the Soft Sand Review and should be read as an Addendum to the Regulation 19 Sustainability Appraisal for the Soft Sand Review of the Joint Minerals Local Plan [Examination Document Library reference [SSR.CSD.002](#)].

## The Sustainability Appraisal (SA) Process and Methodology

The steps taken in relation to the Sustainability Appraisal (SA) for the SSR up to the point of examination are set out in the Regulation 19 Sustainability Appraisal for the Soft Sand Review of the [Joint Minerals Local Plan](#) (2018). This document screens each of the proposed modifications in turn and then assesses the pertinent modifications against the SA Objectives, using the methodology and scoring systems set out in the original SA documentation.

**Table 1: Key to symbols and colour coding used in the SA of the JMLP (and SSR)**

Symbol	Likely Impact of the Policy on the SA Objective(s)
++	Significant positive impact
+	Minor positive impact
0	Negligible or no impact
+/-	Mixture of positive and negative
-	Minor negative impact
--	Significant negative impact
?	Uncertain what effect it will have

# The SA Framework

## Sustainability Appraisal Objectives and Subsidiary Questions

### SOCIAL

**1. To protect and, where possible, enhance health, well-being and amenity of residents, neighbouring land uses and visitors to West Sussex.**

Would the option/policy/site:

- Have harmful effects on human health and be sited close to sensitive receptor(s)?
- Affect amenity through dust and noise (e.g., through blasting/traffic) or vibration?
- Affect road safety?
- Have the potential to create land use conflict issues?
- Provide opportunities for improvements to health, well-being, and amenity through enhancements?
- Create cumulative effects in terms of adverse impacts on environmental quality, social cohesion and inclusion or economic potential?

**2. To protect and, where possible, enhance recreation opportunities for all, including access to and enjoyment of the countryside, open spaces, and Public Rights of Way (PROW).**

Would the option/policy/site:

- Be likely to affect the amenity of users on PROW, recreation areas/open spaces or other users of the countryside in the area, or affect views and/or tranquillity of these areas?
- Provide restoration opportunities for recreation?

### ECONOMIC

**3. To protect, sustain, and where possible, enhance the vitality and viability of the local economy.**

Would the option/policy/site:

- Help the local economy, for example by generating new jobs, and how might implementing the policy impact on local businesses?
- Encourage the provision of more locally based skills and facilities?
- Affect tourists' decisions to visit an area?
- Compromise safe operating of commercial aerodromes (i.e., be near to an airfield and through restoration likely to attract large numbers of birds and increase the chance of bird strike)?

**4. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.**

Would the option/policy/site:

- Reduce the extraction of virgin materials?
- Avoid sterilising mineral resources by preventing unnecessary development on or near to mineral resources?
- Require prior extraction if development that would sterilise mineral resources were to go ahead?

## ENVIRONMENTAL

### **5. To protect, and where possible, enhance the landscape, local distinctiveness, and landscape character in West Sussex.**

Would the option/policy/site:

- Help enable the protection of landscape (particularly AONBs and SDNP) and townscape character?
- Contribute to the restoration of minerals sites, maximising after-use potential for beneficial use (e.g., agriculture, nature conservation, recreation, amenity, water storage, flood management) as appropriate?
- Facilitate the supply and use of local building materials to protect local character?
- Affect dark skies from light pollution?
- Protect and enhance the tranquillity of West Sussex including the SDNP and AONBs (e.g., by minimising noise arising from minerals facilities and transport)?
- Encourage landscape improvement?

### **6. To protect, conserve and enhance biodiversity including natural habitats and protected species.**

Would the option/policy/site:

- Have an adverse effect on biodiversity, including the protection of designated sites (e.g., Special Protection Areas, Special Areas of Conservation, Ramsars, Sites of Special Scientific Interest, National Nature Reserves and Ancient Woodland)?
- Have an adverse effect on locally designated sites which form part of a network of ecosystems?
- Have an adverse effect on wider habitat networks (including BAP habitats) and land used by protected species?
- Provide opportunities for enhancing biodiversity and achieving net gains as part of the development or restoration?

### **7. To protect and conserve geodiversity.**

Would the option/policy/site:

- Have an adverse effect on geodiversity, including the protection of geological features or sites (e.g., Sites of Special Scientific Interest, and Local Geological Sites, formally RIGS)?
- Create new geological exposures of education interest?
- Provide opportunities for geodiversity as part of the development or restoration?

### **8. To conserve, and where possible, enhance the historic environment.**

Would the option/policy/site:

- Help enable the conservation of features of archaeological and other historic interest in the county, such as conservation areas, listed buildings, scheduled ancient monuments and areas of archaeological potential?

### **9. To protect and, where possible, enhance soil quality, and minimise the loss of best and most versatile land.**

Would the option/policy/site:

- Minimise the loss of the best and most versatile agricultural land?
- Improve the soil quality?

**10. To reduce air pollution and to protect and, where possible, enhance air quality.**

Would the option/policy/site:

- Lead to a change in local air quality?
- Cause further deterioration of air quality in Air Quality Management Areas?
- Cause an increase in deposition of pollutants on sensitive designated nature conservation sites?

**11. To protect and, where possible, enhance water resources, water quality and the function of the water environment.**

Would the option/policy/site:

- Affect the quality of surface and/or groundwater bodies?
- Interfere with the flows of water bodies?

**12. To reduce vulnerability to flooding, in particular preventing inappropriate development in the floodplain.**

Would the option/policy/site:

- Affect the likelihood of flooding or lead to inappropriate development in a flood risk zone (e.g., Flood Zones 2 or 3) contrary to national policy on flooding?
- Impact on flood defences?
- Provide opportunities for flood alleviation/mitigation?

**13. To minimise transport of minerals by roads. Where road use is necessary, to reduce the impact by promoting use of the Lorry Route Network.**

Would the option/policy/site:

- Have the potential for rail or water-based access to and from mineral sites?
- Lead to the production of traffic-derived pollutants, including CO<sub>2</sub>, NO<sub>2</sub> and PM<sub>10</sub> due to road transport to and from minerals sites?
- Optimise the use of the Lorry Route Network and reduce the use of rural roads thus reducing the disruption and pollutants caused by HGVs?

**14. To reduce the emissions of greenhouse gases.**

Would the policy/option/site:

- Lead to the production of carbon dioxide or other greenhouse gases from on-site vehicles and machinery?
- Reductions in transport distances by supporting the location of mineral extraction sites in proximity to surrounding markets for minerals and to serve local needs?
- Encourage the use of renewable or lower carbon energy sources on-site (e.g., through the use of small on-site renewable energy sources, i.e., wind turbines, solar panels)?

## Appraisal of the Proposed Modifications

### Screening and Summary Appraisals

The table below sets out the proposed modifications in turn and each modification is screened for further assessment. A commentary is provided for the screening assessment as well as for the appraisal scoring set out in the following section of this document.

SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	SA Screening	SA Assessment Commentary
SMM1	SSR3	6.2.13	<p><b>New paragraph number: 6.2.14.</b></p> <p>The current 10-year average sales value is much higher than for sharp sand and gravel, at <del>293,737</del> 288,718 tonnes per annum (<del>2008–2017</del> <b>2009-2019</b>), and other relevant local information suggests average demand may be as high as <del>372,459</del> <b>371,869</b> tonnes per annum. Total permitted reserve of land-won soft sand in West Sussex is <del>2,754,000</del> <b>2,300,437</b> which currently provides a landbank of <del>7.4</del> <b>6.2</b> years, based on the 10-year average sales, taking account of other relevant local information. Current reserves are not sufficient to meet demand over the Plan period (up to 2033). Planning Guidance (NPPG, para 064) states that MPA's should also consider average sales over the previous three years, to identify the general trend of demand. The 3-year average of soft sand sales is <del>295,115</del> <b>315,560</b> tonnes (<del>2015–2017</del> <b>2016-2019</b>). Based on this 3-year average and current reserves, the landbank (taking account of other relevant local information) is currently <del>9.3</del> <b>7.3</b> years.</p>	Updated figures as contained in the Local Aggregate Assessment 2019 (May 2020) [SSR.OSD.005a]	This modification reflects the updated LAA and has been screened in for assessment as it refers to the level of sales and the relevant landbank for planning purposes.	Although the figures within 6.2.13 have been updated to reflect the most recent LAA, the conclusions drawn from the data have not changed and the policy direction of the SSR has not changed. The SSR will plan for soft sand in the way set out in the Submission SSR. The changes to the data show a maintained pressure to the existing landbank and the subsequent declining reserve. Therefore, there are no changes to the assessment set out within the SA of the Regulation 19 SSR.
SMM2	SSR4	6.2.14	<p><b>New paragraph number: 6.2.15.</b></p> <p>The relevant strategic objectives are:</p> <p>1: To promote the prudent and efficient production and use of minerals <b>and to ensure a steady and adequate supply</b>, having regard to the market demand and constraints on supply in the Plan area.</p> <p>3: To make provision for soft sand, silica sand and sharp sand and gravel, to meet the need, from outside the South Downs National Park, where possible; and only allow development within the national park in exceptional circumstances and where it is in the public interest.</p>	To fix a typographical error and retain the Strategic Objectives as adopted in the Joint Minerals Local Plan.	This modification has been screened out of assessment as it reflects a typographical error in the original document.	N/A.
SMM3	SSR5	New para 6.2.16	<p>In order to inform the strategy for the provision of land won soft sand, the Authorities considered the opportunities for extraction:</p> <p>within West Sussex but outside of the SDNP</p> <ul style="list-style-type: none"> <li>▪ outside of West Sussex<sup>1</sup></li> <li>▪ from other sources</li> <li>▪ from within the SDNP, within West Sussex</li> <li>▪ a combination of the options</li> </ul> <p><b><u>Footnote 1: where these opportunities are included in emerging or adopted mineral plans, or exist as sites that hold current planning permissions.</u></b></p>	For clarity in response to representations raised by Hampshire County Council.	This modification has been screened in for assessment. SSR5 was assessed in Section 5 of the SA for the SSR (2019). The additional text is supported in the SA assessment (para 5.13) that "...future reviews of the JMLP should take account of the availability of material in the wider south east...". Sites allocated in emerging or adopted minerals plans or that hold planning permissions will have been independently assessed through the planning process, including Sustainability Appraisal, for the impacts of those developments, providing additional measures of support to address the SA Objectives of the SSR.	SSR5 was assessed in Section 5 of the SA for the SSR (2019). The additional text is supported in the SA assessment (para 5.13) that "...future reviews of the JMLP should take account of the availability of material in the wider south east...". Sites allocated in emerging or adopted minerals plans or that hold planning permissions will have been independently assessed through the planning process, including Sustainability Appraisal, for the impacts of those developments, providing additional measures of support to address the SA Objectives of the SSR.
SMM4	SSR36	-	<p><b>New paragraph number: 7.2.8.</b></p> <p><b>East of West Heath Common (Extension), Rogate (Policies Map 9):</b> Located near to Rogate, Chichester, the extension to West Heath Quarry is located within the South Downs National Park, and used for agricultural purposes. The site is approximately 14 hectares in size and would provide 950,000 tonnes of soft sand. <b><u>The area available for extraction may be limited by the development principles set out below, including the results of the hydrogeological survey.</u></b> Materials would be exported from the extension site to the existing quarry by conveyor or pipeline, for processing, before transport by road using the existing quarry access and routing provision. Development of this site <b><u>should avoid and minimise any impact on West Heath Common and the River Rother Local Wildlife Site.</u></b> Development should also contribute to the Petersfield to Pulborough via Midhurst non-motorised route. The after use for this site would be to create a low-level water environment that should maximise nature conservation and informal recreation. Any restoration scheme should be fully integrated with the restoration scheme on the existing site. The restoration proposals should also take account of the opportunities to improve long distance trails and key public Rights of Way. Restoration proposals should clearly relate to landscape projects in the wider South Downs National Park<sup>1</sup>.</p> <p>Footnote 1: SSR Landscape Assessment (2019).</p>	<p>a) To include wording agreed with the Environment Agency.</p> <p>b) To provide additional references to West Heath Common and the River Rother discussions at the Hearings.</p>	This modification has been screened in for assessment as it provides additional environmental criteria for these development principles.	<p>The SA of the SSR at Regulation 19 stage recommended the Development Principles for each allocation reflected the Objectives of the Sustainability Appraisal.</p> <p>The modifications proposed under SMM4 increase the protection of the water environment, West Heath Common and the River Rother Local Wildlife Site.</p> <p>The modifications are positive in terms of the SA Objectives, particularly the objectives related to water quality, landscape, and biodiversity.</p>

SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	SA Screening	SA Assessment Commentary
SMM5	SSR38	-	<p><b>New paragraph number: 7.2.9.</b></p> <p>The development principles for the East of West Heath Common site are as follows:</p> <p><b><u>i. Development proposals must identify and incorporate opportunities for net gains in biodiversity;</u></b></p> <p><b><u>ii. i-</u></b>A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites;</p> <p><b><u>iii. ii-</u></b>A landscape and visual impact assessment should inform the development of proposals for the extraction of minerals from the site (including the use of conveyors or pipeline), taking into account and seeking to minimise adverse impacts on the South Downs National Park;</p> <p><b><u>iv. iii-</u></b>The Landscape and Visual Impact Assessment should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;</p> <p><b><u>v. iv-</u></b>Existing hedgerows, mature trees and vegetation along perimeters and within the site, <del>should</del> <b>must</b>, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;</p> <p><b><u>vi. v-</u></b>There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</p> <p><b><u>vii. vi-</u></b>Proposals should ensure that there are no significant adverse impacts on the nearby Scheduled Monuments bridges and structures on relevant parts of the road network;</p> <p><b><u>viii. vii-</u></b>At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;</p> <p><b><u>ix. viii-</u></b>A hydrological assessment should be completed, evaluating and seeking <b>to avoid</b> and minimise the impact from the proposals on ground water and watercourses, <del>including the River Rother SNCI</del>. <b><u>Where necessary, changes to the development boundary will be made to prevent impacts on the water environment.</u></b></p> <p><b><u>x. ix-</u></b>The potential for impact on the Wealden Heaths Phase II SPA and East Hampshire Hangers SAC should be considered, and mitigation applied to ensure no harm occurs;</p> <p><b><u>xi. x-</u></b>Any loss of potentially high-quality agricultural land should be minimised and mitigation provided, if required;</p> <p><b><u>xii. xi-</u></b>A lighting, noise, dust, odour, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</p> <p><b><u>xiii. xii-</u></b>Consideration <del>should</del> <b>must</b> be given to ensuring mitigation measures are applied to Public Footpath 861, which is 500m west of the site, and may be impacted by the use of conveyors;</p> <p><b><u>xiv. xiii-</u></b>Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site. <del>A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.</del></p> <p><b><u>xv. xiv-</u></b><b><u>A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.</u></b></p>	<p>a) The development principles for the site amended to included recommendation from the Environment Agency.</p> <p>b) To insert a new development principle to require net gain in biodiversity for consistency with national policy.</p> <p>c) To strengthen wording in relation to submitted development principles iv, vii and xii.</p> <p>d) To amend a drafting error and add the requirement for a site liaison group as a separate development principle.</p>	<p>This modification has been screened in for assessment as it provides additional environmental criteria for these development principles.</p>	<p>The SA of the SSR at Regulation 19 stage recommended the Development Principles for each allocation reflected the Objectives of the Sustainability Appraisal.</p> <p>The modifications proposed under SMM5 require more specific protection of the local environment and include a requirement for net gains in biodiversity.</p> <p>The modifications are positive in terms of the SA Objectives, particularly the objectives related to water quality, landscape, natural environment, and amenity.</p>



SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	SA Screening	SA Assessment Commentary
SMM6	SSR34	-	<p><b>New paragraph number: 7.2.7.</b></p> <p>The development principles for Ham Farm are as follows:</p> <p><b>i. Development proposals must identify and incorporate opportunities for net gains in biodiversity;</b></p> <p><b>ii. i-</b>A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites</p> <p><b>iii. ii-</b> A Landscape and Visual Impact Assessment should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park and its setting, and Wiston Park;</p> <p><b>iv. iii-</b>The LVIA should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;</p> <p><b>v. iv-</b>The access should be carefully sited to ensure lines of mature broadleaf trees remain intact. A tree survey and arboricultural impact assessment in accordance with “BS5837 Trees in Relation to Design, Demolition and Construction 2012” should be provided to ensure that retained trees are adequately protected from site operations and that any to be removed are clearly identified and appropriate mitigation proposed;</p> <p><b>vi. v-</b>The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting;</p> <p><b>vii. vi-</b>During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen species) along the eastern and southern boundaries to strengthen and reinforce existing screening of views into the site from the A283, Cherrytree Rough to the north and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape character in order to minimise unintended additional impacts on landscape character from incongruous screening features;</p> <p><b>viii. vii-</b>Existing hedgerows, mature trees, and vegetation along perimeters and within the site, <del>should</del> <b>must</b>, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;</p> <p><b>ix. viii-</b>There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</p> <p><b>x. ix-</b>A historic building setting impact assessment of nearby listed buildings (including but not limited to Horsebrook Cottage and Wappingthorn Manor) should be carried out and mitigation provided, if required;</p> <p><b>xi. x-</b>At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;</p> <p><b>xii. xi-</b>A hydrological assessment should be completed, evaluating and seeking to <b>avoid and</b> minimise the impact from the proposals on ground water and watercourses, including but not limited to, Alderwood Pond and Wiston Pond;</p> <p><b>xiii. xii-</b>A flood risk assessment should be carried out and mitigation provided, if required;</p> <p><b>xiv. xiii-</b>The transport assessment should consider the net impact of changing the land use from agricultural (maize production) to mineral and include allowances for the importation of materials for restoration and importation of feedstock for anaerobic digestion at Wappingthorn Farm;</p> <p><b>xv. xiv-</b>A HGV routing agreement is required, including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the villages of Steyning and Storrington;</p> <p><b>xvi. xv-</b>If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required;</p> <p><b>xvii. xvi-</b>Vehicular access to the site to be created at the existing gated access and shall be designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs;</p> <p><b>xviii. xvii-</b>There <del>should</del> <b>must</b> be an assessment of the cumulative impact associated with other development (e.g., other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required;</p> <p><b>xix. xviii-</b>Any loss of potentially high-quality agricultural land should be considered and mitigation provided, if required;</p> <p><b>xx. xix-</b>There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary;</p> <p><b>xxi. xx-</b>A lighting, noise, dust, odour, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</p> <p><b>xxii. xxi-</b>Options for restoration could include reinstating the original profile of the site and returning it to agricultural use and restoring the structure of hedgerows and hedgerow trees, with the aim of maximising farmland habitat value, and connectivity with the surrounding structure of hedgerows and lines of trees. Long term restoration should aim to maximise the habitat value by taking opportunities to link the surrounding hedgerow and woodland structure; and</p> <p><b>xxiii. xxii-</b>A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.</p>	<p>a) To insert a new development principle to require net gain in biodiversity for consistency with national policy.</p> <p>b) To strengthen wording in relation to submitted development principles vii, xi and xvii.</p>	<p>This modification has been screened in for assessment as it provides additional environmental criteria for these development principles.</p>	<p>The SA of the SSR at Regulation 19 stage recommended the Development Principles for each allocation reflected the Objectives of the Sustainability Appraisal.</p> <p>The modifications proposed under SMM6 require more specific protection of the local environment and include a requirement for net gains in biodiversity.</p> <p>The modifications are positive in terms of the SA Objectives, particularly the objectives related to water quality, landscape, natural environment, and amenity.</p>



SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	SA Screening	SA Assessment Commentary
SMM7	SSR40	-	<p><b>New paragraph number: 7.2.11.</b></p> <p>The development principles for the Chantry Lane Extension are as follows:</p> <p><b>i. Development proposals must identify and incorporate opportunities for net gains in biodiversity;</b></p> <p><b>ii.</b> <del>i.</del> A project level Appropriate Assessment is required to assess potential impacts and demonstrate how this site will be delivered without any adverse effect on the integrity of any Natura 2000 sites;</p> <p><b>iii.</b> <del>ii.</del> A Landscape and Visual Impact Assessment (LVIA) should inform the development of proposals for the extraction of minerals from the site, taking into account and seeking to minimise impacts on the South Downs National Park;</p> <p><b>iv.</b> <del>iii.</del> The LVIA should cross reference all other relevant studies within the Environmental Statement in order to ensure that it is fully integrated and considers both direct and indirect impacts from any proposals;</p> <p><b>v.</b> <del>iv.</del> The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting, and designed to accord with the standards and guidance within the Design Manual for Roads and Bridges and Roads in the South Downs;</p> <p><b>vi.</b> <del>v.</del> During excavation there should be screening, such as perimeter mounding and planting of native trees and shrubs (including native evergreen species) along the boundaries to strengthen and reinforce existing screening of views into the site from the A283, and surrounding open farmland should be considered as part of the Landscape and Visual Impact Assessment process. Any screening landform and/or planting should be designed to be consistent with local landscape character in order to minimise unintended additional impacts on landscape character from incongruous screening features;</p> <p><b>vii.</b> <del>vi.</del> Existing hedgerows, mature trees, and vegetation along perimeters and within the site, <del>should</del> <b>must</b>, where possible, be retained and linked to new planting to create continuous corridors of trees and vegetation, connected to wider networks of hedges in surrounding areas;</p> <p><b>viii.</b> <del>vii.</del> There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</p> <p><b>ix.</b> <del>viii.</del> At pre-application stage, a Lidar survey should be undertaken and an assessment of the impacts on buried archaeological remains should be carried out including archaeological field evaluation and mitigation measures where required;</p> <p><b>x.</b> <del>ix.</del> A hydrological assessment should be completed, evaluating and seeking to <b>avoid and</b> minimise the impact from the proposals on ground water and watercourses, given its location close to the Arun Valley SPA;</p> <p><b>xi.</b> <del>x.</del> An HGV routing agreement is required, including a robust approach to monitoring adherence, to ensure that HGVs travelling to/from the site avoid the village of Storrington;</p> <p><b>xii.</b> <del>xi.</del> If the traffic from the site could have a negative impact on the Air Quality Management Area in Storrington High Street, then an Air Quality Assessment is required;</p> <p><b>xiii.</b> <del>xii.</del> There <del>should</del> <b>must</b> be an assessment of the cumulative impact associated with other development (e.g., other minerals development) including landscape and transport considerations, such as the A24/A283 Washington roundabout and mitigation, if required;</p> <p><b>xiv.</b> <del>xiii.</del> Any loss of potentially high-quality agricultural land should be minimised and mitigation provided, if required;</p> <p><b>xv.</b> <del>xiv.</del> There are known power cables, power lines and water mains within and adjacent to the site which should be diverted or protected, as necessary;</p> <p><b>xvi.</b> <del>xv.</del> A lighting, noise, dust, odour, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</p> <p><b>xvii.</b> <del>xvi.</del> Proposals for restoration should be informed by a landscape and ecosystem services led strategy agreed with the SDNPA. The strategy should be informed by relevant technical assessments, contribute to the purposes of the SDNP and form a cohesive scheme with the existing quarry site.</p> <p><b>xviii.</b> <del>xvii.</del> A site liaison group involving the local community should be established by the operator to address issues arising from the operation of the site.</p>	<p>a) To insert a new development principle to require net gain in biodiversity for consistency with national policy.</p> <p>b) To strengthen wording in relation to submitted development principles vi, ix and xii.</p>	<p>This modification has been screened in for assessment as it provides additional environmental criteria for these development principles.</p>	<p>The SA of the SSR at Regulation 19 stage recommended the Development Principles for each allocation reflected the Objectives of the Sustainability Appraisal.</p> <p>The modifications proposed under SMM7 require more specific protection of the local environment, including a requirement for net gains in biodiversity and a further assessment of cumulative impact at the time an application comes forward.</p> <p>The modifications are positive in terms of the SA Objectives, particularly the objectives related to water quality, landscape, natural environment, and amenity.</p>

## Modifications to Policy M2 Recommendations

The table below sets out an updated assessment for Policy M2 as revised by proposed modification SMM2.

SA of Submission M2	Modifications in SMM2
<p>The SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. The SA recommends that Policy M2 clearly sets out a hierarchy of decision making, ensuring that sites only come forward in relation to the need at the time of the application and applicants are signposted to the NPPF requirement to seek sites outside of designated landscapes in the first instance.</p> <p>Policy M2 should be clear that sites allocated in Policy M1 I have precedence over windfall sites and that sites should be well located to the Lorry Route Network if other modes of transport is not viable. The JMLP contains a number of DM policies which can control and ensure mitigation of any impacts from development and the policy should clearly reference this, or provide further information in the supporting text. As the strategy allows for allocations in the SDNP, M2 should be clear that any application will be considered in the context of major development and applications outside of the SDNP also must assess the potential impact they would have.</p>	<p>The modification proposed increases the certainty that sites referred to in criterion (b) in any provision from outside of the Plan Area will have been subject to assessment through a development plan process or the planning application process. The modification is seen as positive in terms of the SA Objectives for the SSR.</p>

## Modifications to Policy M1 I Recommendations

The table below sets out an updated assessment for Policy M1 I as revised by proposed modification SMM4, SMM5, SMM6 and SMM7.

SA of Submission M1 I	SA of Modifications in SMM4, SMM5, SMM6 and SMM7
<p>As stated above, the SA assessments indicate that the most sustainable strategy is likely to be a combination of the options that allows for all potential sites and sources to come forward, where they are available, over the plan period. Policy M2 incorporates a hierarchy of decision making and the SA recommendations set out above.</p> <p>The requirements for M1 I are assessed in this context. Policy M1 I should be clear that sites will be assessed in the context of all the policies within the JMLP, and other relevant policies in the development plan. The adopted policy includes a series of 'Development Principles' for the allocation at West Hoathly Brickworks. It is recommended that these are included of all soft sand allocations and that these follow the outcomes of the technical assessments and the HRA.</p>	<p>The SA of the SSR at Regulation 19 stage recommended the Development Principles for each allocation reflected the Objectives of the Sustainability Appraisal.</p> <p>The modifications proposed under SMM4 to SMM7 require more specific protection of the local environment, including a requirement for net gains in biodiversity and a further assessment of cumulative impact at the time an application comes forward.</p> <p>The modifications are positive in terms of the SA Objectives, particularly the objectives related to water quality, landscape, natural environment, and amenity.</p>

## Modifications to Policy M11 and Development Principles for each Site Allocation

The table below sets out an updated assessment for each Site Allocation as revised by proposed modification SMM4, SMM5, SMM6 and SMM7. Refer to Table 1 on page 2 for the key to symbols and colour coding used.

SA Objective	Chantry Lane	SMM7	East of West Heath	SMM4 and SMM5	Ham Farm	SMM6
1. To protect and, where possible, enhance health, well-being and amenity of residents, neighbouring land uses and visitors to West Sussex.	0/-?	0/-?	0/-?	0/-?	0/-?	0/-?
2. To protect and, where possible, enhance recreation opportunities for all, including access to the countryside, open spaces, and Public Rights of Way (PROW).	0	0	+?	+?	-?	-?
3. To protect, sustain, and where possible, enhance the vitality and viability of the local economy.	+	+	+	+	+	+
4. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	+	+	+	+	+	+
5. To protect, and where possible, enhance the landscape, local distinctiveness, and landscape character in West Sussex.	-	-	-	-	-	-
6. To protect, conserve and enhance biodiversity including natural habitats and protected species.	-?	+?	-?	+?	-?	+?
7. To protect and conserve geodiversity.	-?	-?	0	0	0	0
8. To conserve, and where possible, enhance the historic environment.	-?	-?	-?	-?	-?	-?
9. To protect and, where possible, enhance soil quality, and minimise the loss of best and most versatile land.	0	0	0	0	--	--
10. To reduce air pollution and to protect and, where possible, enhance air quality.	-?	-?	-?	-?	-?	-?
11. To protect and, where possible, enhance water resources, water quality and the function of the water environment.	?	+?	?	+?	?	+?
12. To reduce vulnerability to flooding, in particular preventing inappropriate development in the floodplain.	0?	+?	-?	+?	0?	+?
13. To minimise transport of minerals by roads. Where road use is necessary, to reduce the impact by promoting use of the Lorry Route Network.	--	--	0	0	-	-
14. To reduce the emissions of greenhouse gases.	-?	-?	-?	-?	-?	-?

## Cumulative impact of sites

The sites put forward within the Submission SSR have not changed through the Modifications and are:

- Ham Farm
- East of West Heath
- Chantry Lane Extension

Two sites are in reasonable proximity (Ham Farm, Chantry Lane Extension) and one site is some distance away. Modifications SMM4 to SMM7 are supported by the SA for the Submission SSR which stated that the potential for cumulative impacts needs to consider existing minerals development as well as the impact of the combination of sites proposed. The modifications increase the robustness of the development principles in relation to the SA Objectives.

## Next steps

This SA Addendum will be available for consultation alongside the SSR Modifications Consultation between November 2020 and January 2021.

Following this stage any comments on the SA will be submitted to the appointed Planning Inspector, along with the representations related to the Modifications. The SA and any comments will then be considered by the planning inspector who will review the representations and issue his report. If the SSR, as modified, is considered sound, it will be adopted, and the Authorities will prepare and publish an Adoption Statement.