

## Addendum to the Habitats Regulation Assessment for the Soft Sand Review Proposed Modifications to the SSR (October 2020)

This document should be read in conjunction with the Regulation 19 Habitats Regulation Assessment (HRA) of the Soft Sand Review, September 2019 [Examination Document Library reference [SSR.OSD.008](#)]. The table below considers the proposed modifications to the Soft Sand Review in turn against the test for Likely Significant Effects. The outcome of the consideration against the test for Likely Significant Effects is that none of the modifications proposed alter the conclusions of the original HRA document.

SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	Likely Significant Effects Test
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>7.3</del> <b>7.3</b> years.</p>	Updated figures as contained in the Local Aggregate Assessment 2019 (May 2020) [SSR.OSD.005a]	This modification sets out amendments as per the latest LAA figures. The nature of these changes are such that <b>this modification does not alter the conclusions of the Submitted HRA.</b>
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 is correcting a typographical error for consistency with the adopted JMLP. The nature of this change is such that <b>this modification does not alter the conclusions of the Submitted HRA.</b>
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>Footnote 1: where these opportunities are included in emerging or adopted mineral plans, or exist as sites that hold current planning permissions.</b></p>	For clarity in response to representations raised by Hampshire County Council.	This modification is a matter of contextual clarification. <b>This modification does not alter the conclusions of the Submitted HRA.</b>
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>The area available for extraction may be limited by the development principles set out below, including the results of the hydrogeological survey.</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>should avoid and minimise any impact on West Heath Common and the River Rother Local Wildlife Site.</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 discussions at the Hearings.</p>	These additions are positive with regards to ecology, and provide clarification and strengthening to the criteria. <b>This modification does not alter the conclusions of the Submitted HRA.</b>

SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	Likely Significant Effects Test
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><u>i. Development proposals must identify and incorporate opportunities for net gains in biodiversity:</u></p> <p><del>ii. 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><del>iii. ii-</del>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><del>iv. iii-</del>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><del>v. iv-</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><del>vi. v-</del>There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</p> <p><del>vii. vi-</del>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><del>viii. vii-</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><del>ix. viii-</del>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>Where necessary, changes to the development boundary will be made to prevent impacts on the water environment.</b></p> <p><del>x. ix-</del>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><del>xi. x-</del>Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required;</p> <p><del>xii. xi-</del>A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</p> <p><del>xiii. xii-</del>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><del>xiv. xiii-</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. <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><del>xv. xiv-</del> <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.</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>These additions are positive with regards to ecology, and provide clarification and strengthening to the criteria. <b>This modification does not alter the conclusions of the Submitted HRA.</b></p>

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SMM6	SSR34	-	<p><b>New paragraph number: 7.2.7.</b></p> <p>The development principles for Ham Farm are as follows:</p> <p><u>i.</u> <del>Development proposals must identify and incorporate opportunities for net gains in biodiversity;</del></p> <p><u>ii.</u> <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</del></p> <p><u>iii.</u> <del>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;</del></p> <p><u>iv.</u> <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;</del></p> <p><u>v.</u> <del>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;</del></p> <p><u>vi.</u> <del>The entrance to the site should be carefully designed to minimise adverse impacts upon the South Downs National Park and its setting;</del></p> <p><u>vii.</u> <del>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;</del></p> <p><u>viii.</u> <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;</del></p> <p><u>ix.</u> <del>There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</del></p> <p><u>x.</u> <del>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;</del></p> <p><u>xi.</u> <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;</del></p> <p><u>xii.</u> <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, including but not limited to, Alderwood Pond and Wiston Pond;</del></p> <p><u>xiii.</u> <del>A flood risk assessment should be carried out and mitigation provided, if required;</del></p> <p><u>xiv.</u> <del>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;</del></p> <p><u>xv.</u> <del>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;</del></p> <p><u>xvi.</u> <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;</del></p> <p><u>xvii.</u> <del>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;</del></p> <p><u>xviii.</u> <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;</del></p> <p><u>xix.</u> <del>Any loss of potentially high quality agricultural land should be considered and mitigation provided, if required;</del></p> <p><u>xx.</u> <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;</del></p> <p><u>xxi.</u> <del>A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</del></p> <p><u>xxii.</u> <del>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</del></p> <p><u>xxiii.</u> <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>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>These additions are positive with regards to ecology, and provide clarification and strengthening to the criteria. <b>This modification does not alter the conclusions of the Submitted HRA.</b></p>

SMM Ref	SSR Ref	JMLP Para/Policy	Proposed Modification	Reason for Proposed Modification	Likely Significant Effects Test
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><u>i.</u> <del>Development proposals must identify and incorporate opportunities for net gains in biodiversity;</del></p> <p><u>ii.</u> <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;</del></p> <p><u>iii.</u> <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;</del></p> <p><u>iv.</u> <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;</del></p> <p><u>v.</u> <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;</del></p> <p><u>vi.</u> <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;</del></p> <p><u>vii.</u> <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;</del></p> <p><u>viii.</u> <del>There should be phasing of working and restoration to minimise impacts associated with unrestored open excavated areas;</del></p> <p><u>ix.</u> <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;</del></p> <p><u>x.</u> <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;</del></p> <p><u>xi.</u> <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;</del></p> <p><u>xii.</u> <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;</del></p> <p><u>xiii.</u> <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;</del></p> <p><u>xiv.</u> <del>Any loss of potentially high quality agricultural land should be minimised and mitigation provided, if required;</del></p> <p><u>xv.</u> <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;</del></p> <p><u>xvi.</u> <del>A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided;</del></p> <p><u>xvii.</u> <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.</del></p> <p><u>xviii.</u> <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>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>These additions are positive with regards to ecology, and provide clarification and strengthening to the criteria. <b>This modification does not alter the conclusions of the Submitted HRA.</b></p>

### Next steps

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

Following this stage any comments on the HRA will be submitted to the appointed Planning Inspector, along with the representations related to the Modifications. The HRA 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.