

30 January 2020

The Examining Authority Case Team Southampton to London Pipeline National Infrastructure Planning Temple Quay House 2 The Square Bristol BSI 6PN

By email only

Dear Sir / Madam

DCO Application for the Southampton to London Pipeline Project SDNPA Deadline 4 Submission

I write to provide South Downs National Park Authority's (SDNPA) response to the Examining Authority's questions released on 13 January, reference ExQ2. Our responses to the relevant questions follow on from the end of this letter.

I also write in response to the applicant's request to make changes to the original application and to provide a response to a matter raised in a Deadline 3 submission from the applicant.

Applicant's Change Request

The Examining Authority issued a letter dated 13 January 2020 (your reference EN070005) concerning the applicant's request to make changes to the original application.

The letter was addressed to parties other than South Downs National Park Authority but in the penultimate paragraph of this letter the Examining Authority requests the views of all relevant local authorities and relevant highways authorities on the revised traffic assessments provided within the Change Request. The letter also requests reasoned explanation as to whether the proposed changes would amount to a material change to the Application.

The SDNPA is not the local planning authority for the area proposed for the temporary logistics hub at the A31/A32 junction. However, this logistics hub would be proximate to the boundary with the South Downs National Park.

The SDNPA has no comments to make on the revised traffic assessments provided within the change request. The SDNPA does not consider that this Change Request represents a material change to the Application. This is because:

- No new, or different, likely significant environmental effects have been identified as a result of this change
- Across the pipeline route as a whole the removal of a number of temporary logistics hubs results in a general reduction of construction related effects
- In relation to the logistics hub at the A31/A32 junction, proximate to the National Park, the proposed reduction in size reduces the visual impact compared to the original proposal
- Although it is acknowledged that there will be an increase in traffic to the temporary logistics hub at the A31/A32 junction it represents a small percentage of the existing traffic on these roads and can be accommodated within the existing road network. A Construction Management Plan, as the applicant has committed to in draft DCO Requirement 7, would be important to ensure that vehicular traffic, where possible, avoids the National Park.

Comments on responses submitted at deadline 3

The applicant's stated intention, in examination library reference REP3-016, page 20, to accord with the SDNPA's Dark Skies Technical Advice Note (April 2018) in respect of temporary construction lighting is welcomed. The SDNPA looks forward to seeing this commitment made in the forthcoming outline CEMP to be submitted by the applicant at Deadline 4 and which would ultimately be secured by draft DCO Requirement 6.

Yours faithfully



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Response from the South Downs National Park Authority to the Examining Authority's written questions and requests for information (ExQ2)

The South Downs National Park Authority's (SDNPA) response to the questions asked of it are contained in the table below, against the Examining Authority's original question for ease of reference. These responses are provided for Deadline 4 of the examination (30 January, 2020).

Question Reference	Subject	Examining Authority Question	SDNPA Response
DCO.2.I	The dDCO at D3	The Applicant provided a response at D3 [REP3-010] to all concerns raised by local authorities at D1 and D2 in respect to the then latest version of the dDCO [AS-059]. Aside from the matters questioned below, set out any outstanding concerns with the latest dDCO [REP3-006].	In addition to the comments raised elsewhere in this table SDNPA maintains the following outstanding concerns with the latest, draft DCO: i) In respect of Part 3, Article 14 this gives the applicant reasonably broad powers and the SDNPA has concerns about the potential impact on the National Park. Therefore, in order to protect the scenic beauty of the National Park, we ask that where a new vehicular access is to be created or an existing access is to be altered approval should be sought in advance from the relevant Local Planning Authority.
			ii) Regarding Requirement 7 (Construction Traffic Management Plan) SDNPA consider that the CTMP should be determined by the Local

Planning Authority, not the Highways Authority. This should be dealt with by LPAs as there are local planning impacts arising from the construction impacts of the proposals; for example on tranquillity, one of the special qualities of the South Downs National Park. Local Planning Authorities are also used to dealing with such documents.
iii) Proposed DCO Requirement 8 (I) (b) states that the reinstatement of all hedgerows and trees must be undertaken in accordance with a written plan of reinstatement and sub section 2 states that this must form part of the landscape and ecological management plan approved in accordance with proposed DCO Requirement I2. Sub section (3) of requirement number I2 states that a landscape and ecological management plan will only be required for those stages of the development identified in the Environmental Statement. We seek clarification that this would include the entirety of the pipeline route within the National Park.
iv) Requirement 14 would limit construction works to between 0800 and 1800 on weekdays and Saturdays. The development is in sensitive areas of moderate and high levels of tranquility within the National Park and proximate to numerous public rights of way. The public rights of way network is most heavily used at weekends and local residents would, also,

			v)	reasonably expect to experience less disruption at weekends. Therefore the SDNPA considers that construction works should be limited to between 0800 and 1300 hours on Saturdays, as would, of course, be the case with general construction works across England. Should the proposed pipeline receive consent, the above ground elements of the scheme may remain in place beyond the operational life of the pipeline. The SDNPA request that if the proposed pipeline ceased to be in use that all above ground infrastructure associated with the development should be removed and the land restored to its previous state within an agreed period of time of the pipeline ceasing to be in use. The SDNPA respectfully requests a DCO requirement be imposed to ensure this.
DCO.2.13	Part 6, Article 41 — Felling or lopping of trees	The ExA notes the alterations to this Article made at D3 [REP3-006] and Rushmoor Borough Council [REP3-041], Spelthorne Borough Council [REP3-045], and the SDNPA's [REP3-061] continued objection to this Article. The ExA will defer further specific questioning of this Article until after it has examined the additional documents to be submitted at D4 in respect to the Outline LEMP, Outline CEMP and CoCP to consider whether the powers sought in this Article, taken alongside the relevant Requirements in Schedule 2, are appropriate. However, in the interim:	i)	The applicant's changes to this proposed Requirement are a step in the right direction as they introduce some, fairly weak, constraint on what was previously a broad and unregulated power. However it still gives the applicant very significant licence to remove trees without any environmental compensation for the loss of those trees. The SDNPA objects to this Article as it is currently drafted. It appears to the SDNPA that the amended wording means that if a tree's roots and

		 i) Comment on the changes to the wording of Article 41(1) of the dDCO [REP3-006] in relation to the power to remove trees "near any part of the authorised development" which has been replaced with "within or overhanging land within the Order limits, or may cut back the roots of a tree or shrub which extends into the Order land". ii) Explain with reasons whether the Article prevents any trees (other than branches or roots that encroach within the Order limits) being removed outside of the Order limits. iii) Set out what additional changes, if any, would be required in addition to the Outline CEMP to be submitted at D4 to overcome the concerns raised at D3 that neither this Article, Article 42 or Requirement 6 safeguards trees against unnecessary losses. 	canopy are outside of the order limit felling or other works would now be prevented. Whilst it is relatively easy to determine the canopy, the extent of tree roots is more difficult to determine for obvious reasons and tree roots can extend significant distances beyond the trunk of the tree. iii) The SDNPA, at present, is of the view that the loss of trees has not been quantified and that the proposals for mitigation and compensation are inadequate. Obviously the applicant should attempt to minimise the loss of trees in the first instance and the SDNPA looks forward to reviewing and reflecting on the content of the Outline CEMP once submitted at Deadline 4. Through the DCO process the SDNPA would currently like to be able to: • Agree a schedule of works to trees based on British Standard BS5837:2012 • Agree defined mitigation and compensation measures where unexpected works to trees are, for necessary operational reasons, required that are not identified in the schedule of works to trees noted above.
DCO.2.14	Schedule 2, Requirements 6, 7, 9, 12 and 15	The ExA is concerned that the Requirements as worded now only requires matters to be "based upon" its outline versions as opposed to be "substantially in accordance" or "in accordance". No definition exists in the dDCO [REP3-006], and the ExA is not aware of	The SDNPA does not support the 'based upon' wording put forward by the applicant in these proposed DCO requirements. It is a loose form of wording that gives the applicant fairly significant scope to amend documents after they have been

		 any previous legal definition or meaning in any other DCOs of the terminology "based upon". For the Applicant: i) Explain the difference in terminology and its implications. ii) Justify the looser term. Or iii) Alternatively, restore all relevant Requirement to "in accordance". For Relevant Planning Authorities: iv) Comment on the above. 	considered by the Examining Authority and Secretary of State and certified (assuming the DCO is granted). Restoring, where relevant, requirements to 'in accordance' gives certainty, consistency and reassurance for all stakeholders.
DCO.2.15	Schedule 2, Requirement 3	The ExA has expressed concerns regarding the practicalities of this Requirement, specifically how the Applicant intends to deal with each authority and ensure a consistent approach. In the D3 response [REP3-010], the Applicant states that the current drafting of this Requirement reflects that there has been limited engagement with contractors and as such the detail as to how the project would be built out has not been worked up. For the Applicant: i) Explain whether further details will be made available to the Examination before it closes. ii) Amend the Requirement to ensure that development cannot commence until the scheme setting out the stages has been submitted to all relevant planning authorities. For Relevant Planning Authorities:	SDNPA proposes that Requirement 3 be reworded as below. Tracked changes are provided with reference to the draft DCO submitted by the applicant at deadline 3. The authorised development may must not commence until a written scheme setting out all stages of the authorised development in the relevant to it planning authority or highway authority area has been submitted to and approved in writing by the relevant planning and highways authorities We understand that Rushmoor Borough Council, Spelthorne Borough Council and Surrey Heath Borough Council will be putting forward the same, or similar, wording.

		iii) Given the concerns raised at the Issue Specific Hearing on the dDCO held on Wednesday 27 November 2019 [EV-006b] and by Spelthorne Borough Council in its submission at D3 [REP3-045] regarding the wording of this Requirement, provide an alternative form of wording which would be acceptable. N.B – The ExA would hope that a joint response could be provided on an agreed approach	
DCO.2.17	Schedule 2, Requirement 5	In its D3 response [REP3-010] the Applicant has indicated that it does not intend to amend Requirement 5 of the dDCO but has instead inserted a new requirement to maintain an electronic register of requirements. This is set out in new Requirement 20. i) Explain whether this resolves the concerns raised by a number of relevant planning authorities at the ISH on the dDCO held on Wednesday 27 November 2019 [EV-006b]. ii) If not, why not and provide alternative wording that could be used. N.B – The ExA would hope that a joint response could be provided on an agreed approach	Wording is provided below to ensure that the register would be made available and maintained for the requisite period online. A register 'in electronic form' (as proposed by the applicant) could include a document available only by e-mail upon application to the developer which would be unsatisfactory. The timeframe for maintenance of the register is suggested to be extended to 5 years to be consistent with, for example, the draft DCO Requirement 8 for replacement planting. The SDNPA proposes that Requirement 20 be reworded as below. Tracked changes are provided with reference to the draft DCO submitted by the applicant at deadline 3. (1) The undertaker must, as soon as practicable following the making of before the submission of requests for approval under this Order, establish and maintain in an electronic form suitable on a project website available for inspection by members

			of the public a register of requirements contained in this Part of this Schedule that provide for approvals to be given by a relevant authority. (2) The register must set out in relation to each requirement the status of the requirement for each stage of the authorised development, in terms of whether any approval to be given by a relevant authority has been applied for or given in relation to that stage, providing an electronic link to any document containing any approved details. (3) The register must be maintained by the undertaker for a period of 3 5 years following completion of the authorised development. We understand that Rushmoor Borough Council, Spelthorne Borough Council and Surrey Heath Borough Council will be putting forward the same,
DCO.2.24	Schedule 2, Requirement 14	For the Relevant Planning Authorities: The wording of this Requirement has been amended in the dDCO [REP3-006] in light of the discussions at the ISH on the dDCO held on Wednesday 27 November 2019 [EV-006b]. Respond as to the adequacy of this wording. For the Applicant: Whilst the proposed hours of work have been reduced to 08:00-18:00, it is noted that start up and shut down activities for an hour either side of these	The SDNPA is not clear on the meaning, in subsection (3) of this proposed Requirement of "where reasonably necessary continue on an exceptional basis". It is not clear what mechanisms there are to ensure that i) start up and shut down activities are low noise generating activities and ii) that plant and machinery are not operated in the start up and shut down periods.

		times is still proposed. Confirm whether:	It appears that 'dewatering' is repeated, in both (3) (b) and (c).
		 i) Deliveries would occur during the start-up/shut-down activities. ii) What mechanisms are proposed to ensure that these activities are low noise generating activities and that plant and machinery are not operated in these periods as stated in your response. iii) Explain what is meant by "reasonably necessary on an exceptional basis". 	
DCO.2.25	Schedule 2, Requirements 15, 16 and 20	Comment on the adequacy of the new Requirements 15, 16 and 20 in the dDCO [REP3-006].	The wording of new Requirement 15 is considered to be generally acceptable, except where it refers to being 'based upon the outline CEP'. As per our answer to question DCO.2.14 above this should be 'in accordance' with the outline CEP. Requirement 16 is imprecise. It is unclear what works this would involve. It also would not secure the removal of any associated above ground infrastructure no longer required. SDNPA comments related to proposed Requirement 20 are given above in answer to question DCO.2.17.
DCO.2.27	Schedule 2, Requirements 18(4), 21(1) and 24(2)(b)	In its submission at D3 [REP3-006], the Applicant has amended the said Requirements to 42 days. It is not clear from Rushmoor Borough Council's submission at D3 [REP3-041] whether this time period is acceptable or whether it maintains it should be 56 days. SDNPA in its D3 response [REP3-061] considers 56 days to be	 SDNPA maintains its position that 56 days is more appropriate, for the following reasons: Whilst most Requirements can be expected to be dealt with under delegated powers some may require a decision by an LPA's

		 i) Justify why 42 days as proposed by the Applicant is insufficient. ii) Explain whether these concerns extend to Articles 9(5), 10(3), 12(8) and 15(7). 	 planning committee, which will not generally be possible within 42 days from receipt 56 days is considered an appropriate timeframe to discharge planning conditions across England (and on much smaller schemes) 56 days is considered an appropriate timeframe given that the LPA may carry out consultation and may need to secure specialist advice. It is acknowledged that the Planning Inspectorate's Advice Note 15: Drafting Development Consent Orders refers, at Appendix 1, to 42 days but this is a guidance note and therefore not prescriptive.
DCO.2.28	Schedule 2, Requirement 2 I	The dDCO submitted at D2 [REP2-003] (then as Requirement 20) increased the number of business days for the submission of a request for further information from two to five days (20(2)). However, this is still below the number suggested by a number of Local Authorities in their LIRs for example Hampshire County Council [REP1-013] suggested 14 days and Runnymede [REP1-017] and Spelthorne [REP1-021] Borough Councils suggested 15 days was necessary. Explain further why a longer time frame would be necessary.	The SDNPA asked for 5 business days in its Local Impact Report and is therefore now satisfied that this would be secured in the DCO.
HE.2.2	Chawton House	Provide a plan showing the correct boundary of the registered park and garden.	This follows at the end of this table. This was sourced from Historic England's website on 28 January, 2020.

			https://historicengland.org.uk/listing/the-list/list-entry/1000421
LV.2.I	New Tree Survey and Protection Assessment	In their respective LIRs, Spelthorne Borough Council [REPI-021], Runnymede Borough Council [REPI-017] and Surrey Heath Borough Council [REPI-023] requested an additional Requirement be inserted into the dDCO which requires a Tree Survey and Protection Strategy to be submitted to and approved by the relevant planning authority. This is because the Local Authorities did not consider the current REAC, which forms part of the Chapter 16 of the ES [APP-056] and CoCP [REP2-010] are sufficient to deal with the tree loss and mitigation, particularly at identified "hotspot" areas. The Applicant responded at D3 [REP3-010] stating matters would form part of the Arboricultural Management Plan secured by Requirement 6 of the dDCO, an outline of which will be included in the Outline CEMP to be submitted at D4. The Local Authorities in question in their D3 responses [REP3-044] appear to consider the matter remains unresolved. Update the ExA as to the progress with and the content contained in the Arboricultural Management Plan, and whether this would provide the sufficient tree survey and protection assessment as sought by the Local Authorities.	The SDNPA has not seen an outline Arboricultural Management Plan, nor been party to conversations with the applicant on its likely scope and content. The SDNPA is therefore not able to answer the Examining Authority's question in respect of whether such a document would provide sufficient tree survey and protection assessment. The SDNPA will review this outline document and provide comment once it has submitted into the examination by the applicant at Deadline 4.

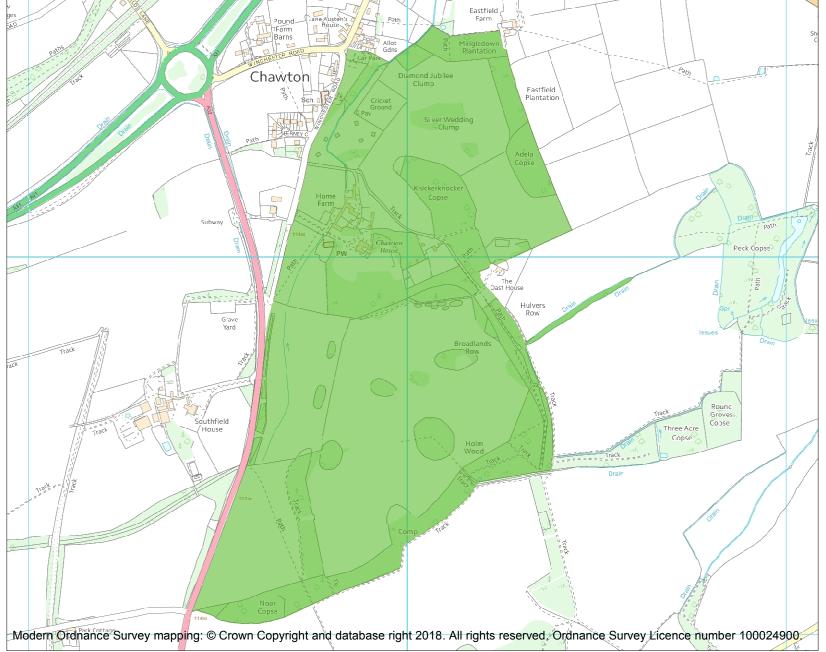
LV.2.4	Tree Replacement Planting	In ExA WQ LV.1.10 [PD-008], the ExA requested a justification for the Applicant's position that no replacement or compensatory planting is required for Tree Preservation Order (TPO) lost trees where a moderate effect is identified at Year 15. The Applicant responded [REP2-045] stating that proposed tree planting and hedgerow infilling shown on Figure 7.56 of Chapter 7 of the ES [APP-047] would partly offset for loss of TPO trees but that this replacement planting would be mainly in rural areas where there is more room to accommodate planting. The ExA is unconvinced that the response resolves the concern.	i) At the moment the applicant cannot quantify the exact number of trees that will be felled, making, of course, the determination of acceptable replacement or compensatory planting more difficult. However, in principle, SDNPA agrees that suitable off-site planting could mitigate for the loss of Tree Preservation Order trees. This would be subject to agreeing suitable replacement ratios and species; for example felling a mature oak tree cannot be compensated for by a handful of hazel trees or a single sapling.
		 i) Explain whether off-site planting could mitigate loss of TPOs particularly in non-rural areas. ii) Explain how this could be secured given that such sites would be outside of the Order Limits. 	Mitigation would also, in SDNPA's view, depend upon the off site planting being located within a reasonable distance of the TPO to be felled and the new planting being subject to a defined, and secured, establishment and maintenance plan.
			ii) This could be secured through a Section 106 legal obligation. As set out in SDNPA's Written Representation (reference REP2-085, page 16) this could be in the form of new planting within proximity of the pipeline route. This could be undertaken either by the applicant itself (to an agreed specification) or through a financial contribution in lieu to the Local Planning Authority.
LV.2.6	Tree Protection	In ExA WQ LV.1.12 [PD-008], the ExA sought	British Standard BS5837:2012 references the

	Measures	confirmation that provision G68 in the REAC, which is contained within Chapter 16 of the ES [APP-056] and relates to the supervision of notable trees by an Environmental Clerk of Works, would also extend to TPO trees, veteran trees and ancient trees.	importance of a competent arboriculturalist being involved in construction works affecting trees. SDNPA considers it imperative that an appropriately qualified and experienced arboriculturalist be provided here (which is not explicitly provided by REAC commitment G3).
		The Applicant's response [REP2-045] stated that no ancient trees were identified from the inventory or during site surveys, but that G86 of the REAC has been amended to include reference to TPO and veteran trees. The Applicant also states that commitment G3 in the REAC refers to 'appropriate specialists' and this could include an arboriculturalist if required.	In our view the direct involvement of an arboriculturalist with specific experience and training in trees and construction matters is crucial given the length of the pipeline, the duration of construction (up to 2 years) and on account of the number of trees within or adjacent to the project Order Limits.
		Confirm the appropriateness of commitment G3 in the REAC with regards to the provision of specialist aboricultural advice	
LV.2.7	Tree Protection Measures	In ExA WQ LV.1.13 [PD-008], the ExA sought an explanation as to why the aboricultural assessment accompanying the ES, which was undertaken in accordance with British Standard 5837:2012, relied on the protective principles for trees used by the National Joint Utilities Group Guidelines (NJUG) for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees ('NJUG Volume 4' (2007).	The Authority's Written Representation (examination library reference REP2-085, paragraphs 3.22 to 3.47) identifies a number of shortcomings of the application for Development Consent when measured against British Standard BS5837:2012. The SDNPA do not consider the use of NJUG to be appropriate as it offers insufficient protection,
		The Applicant responded [REP2-045] that British Standard 5837:2012 is not considered to be the most appropriate guidance for utilities works. The ExA is not persuaded by this response, considering that	especially in terms of root protection areas. The British Standard provides greater protection to the rooting zone in particular (including through construction exclusion zones where appropriate) and also provides greater protection to the

		British Standard 5837:2012 is more rigorous in terms of tree protection fencing. Confirm whether it is accepted that the Applicant's proposed reference to NIUG during the construction period and if not, why not.	mechanical structure of the tree. Given the length of the pipeline, its proximity to a considerable number of trees (including ancient woodland) and on account of its passage through a protected landscape of national importance the more rigourous, and widely accepted, British Standard is considered to be more appropriate. This would be in accordance with paragraph 5.9.11 of the Overarching National Policy Statement for Energy (EN-1) that requires any projects consented in designated areas such as National Parks to be carried out to high environmental standards.
LV.2.8	Planting Mitigation	The ExA notes the Applicant's response to ExA WQ LV.1.14 [REP2-045 and REP2-046] and the provision of a worst-case scenario set of drawings indicating the approximate lengths of hedgerows and the approximate areas of woodlands to be potentially removed. However, commitment G87 of the REAC, which is contained within Chapter 16 of the ES [APP-056] and the CoCP [REP2-010] only requires the Applicant to implement these measures "where	The SDNPA does not consider it acceptable to implement mitigation measures on this topic where practicable. This is not appropriate for any area and especially not for a protected landscape of national importance where Overarching National Policy Statement for Energy (EN-I) requires any consented projects to be carried out to high environmental standards.
		practicable". For the Relevant Planning Authorities: i) Confirm the appropriateness of the Applicant's approach to commitment G87.	The SDNPA hopes that further information on this matter will be contained in the Outline LEMP due to be submitted by the applicant at Deadline 4. It is our view that where replacement planting is not practicable the Landscape and Ecological
		For the Applicant: ii) Explain the process for vegetation clearance,	Management Plan should set out alternative methods for replacement and compensatory

		retention, protection and replanting/reinstatement drawings in the event that it was not practical to implement commitment G87. iii) How this would be advised and agreed with relevant planning authorities. iv) How would changes to the submitted drawings be made and recorded.	planting in the vicinity or by other arrangements to ensure no net loss of trees, woodland or hedgerow in the National Park.
LV.2.14	Logistics Hub at Chawton	At the ISH held on Tuesday 3 December 2019 [EV-009a and EV-009b] SDNPA expressed concerns regarding the negative effect of the logistics hub would have on the National Park, even if reduced in size. The ExA notes that no representative viewpoint has been provided of this location in Appendix 10 of the ES [APP-114]. Provide this representative viewpoint from the Public Right of Way at Chawton to enable the ExA to undertake an USI from this viewpoint.	This follows at the end of this table. The SDNPA's rationale for the provision of this representative viewpoint is: 1. Location: The proposed logistics hub at Chawton is on the north side of the A31 on a pasture field surrounded by a woodland hedgerow, a typical landscape characteristic of this part of Hampshire. The SDNP boundary runs along the south side of the A31 within a continuous tract of land. The logistics site is considered to be within the setting of the SDNP. 2. Duration: The proposed hub will be operational prior to the works on the pipeline starting and will be in use for the duration of the project construction phase 3. Visual receptors: Would be users of the PROW network including a waymarked trail from Chawton House, within the South Downs National Park in a gateway location adjacent to the National Park boundary. Visitor numbers to Chawton village (which includes Chawton House and the Registered

			Parkscape) are estimated to be 25,000 to 35,000 visits per year. 4. Landscape receptors: The road corridor in this location has an undeveloped character and it is viewed from the SDNP within a continuous tract of land which has a strong landscape structure of continuous undulating field patterns, woodland framework and lack of development which extends beyond the boundary of the SDNP. The A31 is not a dominant feature.
PC.2.1	Noise Mitigation and the Use of Echo Fencing	For the Applicant: In response to Action Point 19 [REP3-015] that arose from the ISH on Wednesday 4 December 2019 [EV-010a and EV-010b], explain why the following locations were not included in the list: • Ashford: Ferndale Road; • Lightwater: Briar Avenue; and • Farnborough: Woodland Crescent, Woodstocks, the Chase, Queen Victoria Court, Cabrol Road and Stakes Lane. For Relevant Planning Authorities: Review the locations where the Applicant has suggested the use of Echo fencing as noise mitigation and provide with explanation any other locations where such mitigation would be needed.	The SDNPA has not identified any other areas within the National Park where this solution is required.



This is an A4 sized map and should be printed full size at A4 with no page scaling set.

Name: CHAWTON HOUSE

Heritage Category:

Park and Garden

List Entry No: 1000421

Grade:

County: Hampshire

District: East Hampshire

Parish: Chawton, Farringdon

Each official record of a registered garden or other land contains a map. The map here has been translated from the official map and that process may have introduced inaccuracies. Copies of maps that form part of the official record can be obtained from Historic England.

This map was delivered electronically and when printed may not be to scale and may be subject to distortions. The map and grid references are for identification purposes only and must be read in conjunction with other information in the record.

List Entry NGR: SU7087436893

Map Scale: 1:10000

Print Date: 29 January 2020



HistoricEngland.org.uk

SOUTH DOWNS NATIONAL PARK

Suggested Representative Viewpoint at A31, Chawton



