

Agenda Item 8
Report PC19/20-21

Report to	Planning Committee
Date	10 October 2019
By	Director of Planning
Local Authority	Chichester District Council
Application Number	SDNP/18/05920/FUL
Applicant	South Downs National Park Authority
Application	Extension to Centurion Way (Phase 2) from West Dean to Cocking Hill with Hilltop Connection and Associated Works, consisting of replacement bridge parapets, an earth ramp on Drovers Estate, bridge deck at Littlewood Farm, new ramp to Cocking Cutting, hard surfacing and associated drainage, earthworks, new hedgerows and woodland copse. Proposed works to create a shared path for pedestrians and cyclists.
Address	Centurion Way Extension West Dean to Hoefield Lane and Hilltop Connection, West Sussex PO18 0RD

Recommendation: That planning permission be approved subject to the conditions set out in Section 8 of this report.

Executive Summary

A railway line once ran from Chichester to Midhurst, whilst it has been dismantled the route remains. It has been a long-term goal to reuse the old railway line to provide a non-motorised travel route, this includes a safeguarding policy within the South Downs Local Plan (policy SD20).

Over recent years, part of the former railway line from Chichester to West Dean has been converted to a shared pedestrian / cycle way, known as the 'Centurion Way'.

This application, which is recommended for approval, is seeking permission to extend the Centurion Way (by 5km) from West Dean to Cocking Hill Car Park.

The application is reported to committee due to the applicant being the South Downs National Park Authority and the level of public interest in the application.

I. Background, Site Description and Proposal

- I.1 The application site forms part of the former Chichester to Midhurst railway line which has been dismantled.
- I.2 The route of the former railway is now being reused between Chichester and West Dean to form the 'Centurion Way' an 11km (7 miles) route for walkers and cyclists. The name Centurion Way is based on the fact that the path crosses the course of a Roman road.

- I.3 The former railway line includes three tunnels, West Dean, Singleton and Cocking. Singleton and Cocking Tunnels are designated as a Special Area for Conservation (SAC) and a Site of Special Scientific Interest (SSSI). West Dean Tunnel is designated as a Local Wildlife Site.
- I.4 There were also three stations along the line, the most notable being Singleton due to its proximity to Goodwood. The station buildings at Lavant, Singleton and Cocking survive but are in private ownership. In March 2019 the remaining station buildings at Singleton were designated as a Grade II listed building.
- I.5 The initial section of Centurion Way, south of Lavant, opened in September 1995 with additional sections being opened over the subsequent years. The route was upgraded and extended further in 2015 and currently terminates adjacent to West Dean Primary School, where pedestrians / cyclists then re-join the existing footway and carriageway of the A286.
- I.6 Centurion Way is not currently designated as a Public Right of Way but is listed on Ordnance Survey maps as a recreational route.
- I.7 In 2014, a feasibility study for 'Centurion Way Phase 2' explored a number of options for extending the route northwards from West Dean to the South Downs Way, culminating in the submission of this planning application.
- I.8 Following the submission of amended and additional information, this application is seeking permission to extend the Centurion Way from West Dean in the south to Cocking Hill Car Park to the north. The proposal is for a 5km (3.1 miles) shared use pedestrian and cyclist route.
- I.9 However, the applicant has negotiated with the relevant landowner to secure additional equestrian access on part of the proposed route between Hoefield Lane (Bridleway 450) and the South Downs Way at Cocking Hill car park to provide a new link for equestrians avoiding the A286 in this location and providing an opportunity for a new circular route (linking to existing bridleways).
- I.10 The route will predominately following the line of dismantled railway with the following exceptions:
- The route will avoid the former West Dean railway tunnel (approximately 450 metres in length), a Local Wildlife Site, with the route starting from the Scout Hut and private car park opposite the entrance to the West Dean College (and adjacent to the West Dean Conservation Area). 'Phase 2' will not directly connect to the end of the existing Centurion Way. The Centurion Way currently ends adjacent to West Dean Tunnel, with stepped access adjacent to West Dean Primary School in Motor Road, this proposal will require pedestrians and cyclists to divert back onto the existing footway and carriageway of the A286 for approximately 700 metres before joining the start of Phase 2.
- The applicant has reached an agreement in principle with the Local Highway Authority (West Sussex County Council) to reinstate the footway along this section of the A286 to its former width (up to 1.5 metres), including vegetation reduction, timber revetment and re-surfacing / surface improvements as necessary. It is anticipated that these works will be undertaken by the Local Highway Authority prior to or at the same time as the main construction of the new section of the Centurion Way. The applicant has committed to work in partnership with the Local Highway Authority to secure the necessary funds required to deliver these works;
- Due to the SAC and SSSI designations of the former Singleton and Cocking Tunnels, the proposed route will leave the alignment of the dismantled railway line on the approach to Singleton's southern tunnel portal and will navigate through Rock Wood and Wellhanger Copse (through Ancient Woodland) re-joining the former railway alignment approximately 100 metres north of Singleton's northern tunnel portal;
 - In order to connect with the South Downs Way and avoid the Cocking Tunnel SAC the proposed route climbs the Cocking railway cutting via a proposed timber ramp on the

western side which will connect to Hoefield Lane before diverting into the field running parallel to the A286 before terminating at Cocking Hill Car Park and

- At the former Singleton Railway Station (a Grade II Listed Building), the proposal includes two options for the route to go between the former station platforms. The precise route (i.e. which platforms the route will go between) is subject to final agreement with the landowner (and their own aspirations for further development opportunities of the former Station). This application is presenting (and has assessed) both options however the applicant has confirmed that only one will be implemented.
- 1.11 The shared path will be three metres in width, albeit with verges either side before the proposed fence line giving a potential width of five metres. The proposed surface material is a self-binding limestone dust (as used on the existing Centurion Way). Post and wire fencing is generally proposed along the entire length of the route with some more robust materials being proposed where additional protection is required, such as to the approaches to the existing bridges. No new lighting is proposed along the route.
- 1.12 The application is also seeking permission for other works to support the creation of the route, these include:
- the reinstatement of the former railway bridge at Littlewood Farm,
 - replacement bridge parapets, and
 - the planting of approximately 3,265sqm of hedgerows and trees (as part of the proposed mitigation measures).
- 1.13 Although this application is not proposing any signage, the applicant has committed to the installation of directional signage and interpretation boards along the route. This is to allow for further analysis to be undertaken of suitable locations for the installation of the signage and liaison with landowners, tenants and other stakeholders (such as the Sussex Bat Group).

2. Relevant Planning History

- 2.1 *SDNP/14/03612/RE3* – An extension to the off road recreational path known as the Centurion Way, from Binderton to West Dean (circa. 2000 metres). The project included the reconstruction of the Centurion Way on the approach to the route extension, at Binderton (circa 430 metres), granted permission 26th November 2014.
- 2.2 *SDNP/16/03780/FUL* - Stepped access to Centurion Way south of Motor Road, West Dean, granted permission 31st October 2016.
- 2.3 *SDNP/19/02868/LIS* – Listed Building Consent for the sub-division of a single dwelling into two dwellings (with associated internal and external alterations), Former Station Building, Singleton, granted 30th August 2019.
- 2.4 *SDNP/18/00618/FUL* – The sub-division of a single dwelling into two dwellings, Former Station Building, Singleton, granted permission 29th June 2018.

3. Consultations

3.1 Design and Landscape Officers – no objection.

- The scheme design is functional and generally leads to minimal intervention within the landscape with the path following the existing route of the disused railway line and where it does divert it follows the contours of the land. The mitigation measures proposed are deemed to be appropriate.

3.2 Conservation Officer – no objection.

- There is much to commend in this application, which should greatly increase public awareness of many evocative surviving elements of the London, Brighton & South Coast branch railway between Chichester and Midhurst.
- A useful Heritage Statement has been submitted in support of the application; almost all of the railway structures can properly be regarded as non-designated heritage assets. The Goods Shed at Singleton Station has been listed at Grade II for some time and since

the current application has been submitted, other buildings have been listed, all at Grade II. These comprise the Station House and Booking Hall of Singleton Station, the ruinous but imposing Water Tower and the unusually large Toilet Block, constructed for the convenience of race-goers during Goodwood meetings.

- Platform structures, the pedestrian underpass and mass-concrete retaining structures (an early use of this material) should now be regarded as curtilage structures of the Listed station buildings, not listed in their own right but protected by the associated listing.
- Quite independently of the current application, consent has recently been granted for the refurbishment of the Station House and residential conversion of the Booking Hall under reference SDNP/19/02868/LIS. New uses for the Toilet Block, the Water Tower and the Goods Shed are still sought, but the provision of a publicly accessible path alongside these assets should certainly increase their prominence and may offer new opportunities for their revival.
- With regards to the proposed fencing between the railway platforms at Singleton, it is questioned whether this is actually required. This would have a modest adverse impact on the setting of the station buildings. The platform structures might normally be expected to unassertively channel most walkers along the expected path. It is accepted there may be a concern that walkers might be tempted to explore the platforms and that the underpass, in particular, might represent a hazard or an invitation for potential misuse but would contend that means to secure this feature would probably be better targeted at its specific access points. When the station buildings are occupied again and some natural surveillance is restored it would seem plausible that current security concerns might recede.
- No concerns regarding proposed parapet reinstatements to various bridges, all non-designated heritage assets, or the new metal deck proposed for one of them. These seem to sensible and mostly unassertive interventions which do not carry any significant potential for harm.
- The works have some potential for very minor impacts to the setting of West Dean Conservation Area, but again, these should be negligible. Even if very low levels of harm were to be perceived by others, the clear public benefits of the scheme would plainly outweigh them.
- It would also be good to include some means of site interpretation for the former railway structures with the most obvious location for this at the Singleton Station complex.

3.3 **Natural England** – no objection subject to the comments below.

Habitats Regulations Assessment

- Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has undertaken an appropriate assessment of the proposal, in accordance with Regulation 63 of the Regulations. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.
- The appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that we concur with the findings of the HRA.
- However, we draw your attention to the following issues:

Net gain principles

At present this application does not meet the aspirations laid out in the net gain principles of the South Downs Local Plan policy SD9. The project could invest in reconnecting the

existing ecological network around the tunnels by working with the local bat group, landowners and by public engagement with the local tourist attractions and the local community.

Ancient woodland, nationally and European protected species

Natural England notes that there is some impact on woodland and that protected species have been surveyed. We refer you to our standing advice that you should consider conserving and enhancing biodiversity, and reducing the level of impact of the proposed development on ancient woodland and ancient and veteran trees. You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless there are wholly exceptional reasons and there is a suitable compensation strategy in place.

3.4 Ecology –

- Having reviewed all the amended and additional information a number of previous concerns regarding bats, barn owls and badgers have been addressed. Still remain concerned about reptiles and the impacts to the designated sites however these can be addressed by the use of conditions.

Notable Habitats

- As per previous response, whilst large areas of hedge and woodland planting is proposed, not satisfied that this will compensate for loss of Ancient Woodland, as Ancient Woodland is an irreplaceable habitat. It is therefore up to the Local Planning Authority to decide whether the benefits of the development clearly outweigh the loss of / harm to Ancient Woodland.

Net Gain

- The applicant's ecologist has not demonstrated a measurable net gain in biodiversity by using the new Defra Biodiversity Metric 2.0, which takes into account the distinctiveness of the baseline habitats to be lost (e.g. Ancient Woodland). Therefore, in the absence of any robust information, unable to comment if net gain in biodiversity is capable of being delivered as part of this scheme.

3.5 Local Highway Authority (West Sussex County Council) –

- Welcomes this application and the proposed extension of Centurion Way. Following the submission of additional information in relation to the legal status of the route (for maintenance and liability purposes) and improvements for pedestrians / cyclists on the route between the end of the existing route and the start of Phase 2, WSCC does not object to the principle of the proposals and welcomes the benefits in terms of access that this new route will provide. The route will help to open up and enhance access to the South Downs National Park by sustainable forms of travel.

3.6 Rights of Way Officer (West Sussex County Council) –

- Following the additional information regarding access, we welcome the improved access and continuity to and from the Centurion Way.

3.7 Singleton Parish Council –

- No comments received at time of writing report.

3.8 West Dean Parish Council –

- In favour of this application in principle, but have a serious concern about the safety of users trying to access the southern point of the route. Until the concerns have been met we are unwilling to offer our unconditional support.
- There is no connection between the Phase 1 Centurion Way cycle path and the proposed Phase 2 path so it is incorrect to describe it as an extension.

- The Planning Statement states: *“The provision of a route within the existing A286 highway envelope, either on-carriageway or immediately adjacent, was ruled out due to speed and volume of traffic”*. We find it hard to believe that the applicant could even consider proposing Phase 2 without solving this problem. Highway Safety and Local Planning Policy on walking and cycling routes are material considerations therefore it would be madness to build a new path and encourage people to use it by traversing a really dangerous stretch of road (the A286). This development should really not proceed until these concerns are met and improvements are made.
- Equestrians have been completely ignored.

4. Representations

4.1 At the time of writing the report, 3 representations have been made objecting, 60 representations in support and 2 general comments (neither expressing support nor objection to the proposal) have been received. The comments are summarised below.

4.2 Those objecting to the application raise the following concerns:

- The application ignores horse riders;
- The whole route should be offered as a bridleway;
- The proposal is not in line with Policy SD20 as it excludes horse riders;
- The application is discriminating as it excludes horse riders, and
- The proposed route is an obvious solution for all vulnerable users (such as horse riders) who have to use the dangerous A286 and could help to address the existing fragmented bridleway routes.

4.3 Those supporting the application, including from the Chichester and District Cycle Forum, the Midhurst Area Cycling Forum and the Midhurst Society, state:

- Supportive albeit the route should be made available to horse riders (such as making it a bridleway);
- The Centurion Way is a popular and safe leisure route for walkers and cyclists, therefore it is appropriate that it is taken further north towards Midhurst and this application deserves the full support of the community;
- Major benefit for walkers and cyclists;
- Provides a safe route away from busy main roads;
- Will encourage more families and more vulnerable users to get out and use the route;
- Will assist in improving health and well-being;
- Enables the recreational enjoyment of the South Downs;
- Will be a great asset to the local community in West Sussex and further afield;
- Fantastic opportunity to enjoy this historic route;
- It will be an excellent addition to the existing cycle infrastructure (National Cycle Route 88 and 2);
- Local businesses will benefit (bringing more customers to the area);
- Broadly in support – concerns about the proposed turns in the path due to possible poor sight lines for cyclists;
- Fully supportive although recognise the many compromises needed to agree the route. Would like the SDNPA to explore the opportunities for re-opening the tunnels in the future, and
- Fully support the application however would like clarity around how the non-designated heritage asset (Singleton Station) will be affected by this proposal.

- 4.4 The general comments received were from the British Horse Society and the Sussex Bat Group, they raised the following points:

British Horse Society

- Normally welcome any new off-road route for non-motorised users (NMUs), especially one designed to take vulnerable road users off the A286, an increasingly busy and dangerous road for them, it is regrettable and disappointing to see equestrians excluded from this route.
- The application details proposed connections, and increased access to the wider network of PRow from the proposed main route. Under the present proposals, as equestrians are excluded from the main route (even though the width of 3m and the proposed limestone dust surface are standard on bridleways and other multi-use recreational routes in the county), these links are of limited value.
- Have suggested a list of other improvements that would be of benefit to equestrians (as well as other NMUs) which could also be provided as part of the proposed scheme.

Sussex Bat Group

- Would welcome reassurance that the opening of West Dean tunnel to the public will not be considered further and an alternative route around it will be identified;
- Would like to see the SDNPA monitor the effect on bats (including public access disturbance) once the track is opened;
- Would like confirmation on how the security of the existing tunnels is going to be assured;
- Have suggested possible enhancements including the provision of information boards which could be placed along the track such as near the present information board near to the southern portal of West Dean Tunnel to aid people's understanding of bats and why the tunnels are protected;
- They suggest that it may also be helpful to arrange occasional Open Days at one of the tunnels to allow the public access in order to learn the history and wildlife importance of the site. However, they accept that this will need careful planning and agreement with the owner(s) and input from volunteers who hold appropriate Natural England bat licences.

- 4.5 **Planning Officer Comment:** The applicant has submitted additional / amended information in relation to some of the points raised by consultees and third parties (such as the issue of horse riders using the path) and to address the fact that during the determination of the application Singleton Station has been designated as a Grade II Listed Building. Further consultation with specialists and statutory consultees was carried out and their comments are summarised in Section 3, where relevant those comments have been updated to refer to the applicant's subsequent amendments / additional information. A further explanation of the issues for consideration in the determination of this application is provided in Section 6 of this report.

5. Planning Policy Context

- 5.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan is the **South Downs Local Plan 2014-2033 (SDLP)**. The development plan policies and other material considerations considered relevant to this application are set out below.

National Park Purposes

- 5.2 The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

- 5.3 If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

National Planning Policy Framework (NPPF) and Circular 2010

- 5.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 (DEFRA Circular) and The National Planning Policy Framework (NPPF) which was issued and came into effect on 24 July 2018 and further amended in February 2019. The DEFRA Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 172 that great weight should be given to conserving landscape and scenic beauty in the National Parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

- 5.5 The NPPF has been considered holistically in the determination of this application, although it is considered that the following sections are of particular relevance:

- Section 2: Achieving Sustainable Development
- Section 4: Decision-making
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 12: Achieving well-designed places
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment

- 5.6 In addition to the above, it is considered that paragraphs 7, 8, 10, 11, 47, 91, 92, 98, 102, 108, 109, 127, 170, 172, 175, 176, 177, 184, 189, 192, 193, 194, 196 and 197 of the NPPF are particularly relevant to the determination of this application.

- 5.7 Of these, notably, paragraphs 175 – 177 require the SDNPA to assess whether there is significant harm to biodiversity and if any significant harm cannot be avoided then permission should be refused. If development is on land within or outside a SSSI and / or SAC which is likely to have an adverse effect on it, then permission should not normally be permitted. The only exception is where the benefits of the development in that location outweigh the likely impacts or in the case of irreplaceable habitats (such as Ancient Woodland) there are wholly exceptional reasons and a suitable compensation strategy.

- 5.8 In addition, paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting; Where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset (paragraph 194), Local Planning Authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefit that outweigh that harm or loss; or (paragraph 195) where the proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

Conservation of Habitats and Species Regulations 2017 (as amended)

- 5.9 All projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether that project is likely to have significant effects on the particular habitat site. This consideration is typically referred to as the 'Habitats Regulations Assessment' and this should take into account the potential effects both of the project itself and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, a 'competent authority' must make an 'appropriate assessment' of the implications of the project for that site, in view of the site's specific conservation objectives. The

competent authority may agree to the project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

- 5.10 In this case the 'habitat site' in question is the Singleton and Cocking Tunnel SAC and SSSI, therefore the SDNPA as the 'competent authority' must firstly undertake a 'screening' to assess whether there are 'likely significant effects' and, if yes, undertake an 'appropriate assessment' of the implications for the habitat site. In this case, the SDNPA screened that an appropriate assessment would be required due to the potential for significant effects. The details of the appropriate assessment are set out in more detail within Section 7 of this report.

Town and Country Planning (Listed Building and Conservation Areas) Act 1990

- 5.11 Sections 66 and 72 of the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 are also relevant.
- 5.12 Section 66 relates to the grant of planning permission and states 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.
- 5.13 Section 72 specifically refers to Conservation Areas and requires that 'special attention shall be paid to the desirability of preserving or enhancing the character of that area'.

Major Development

- 5.14 Officers are of the view that the proposal does not constitute major development for the purposes of paragraph 172 of the NPPF. Accompanying footnote 55, advises that 'major development' in designated landscapes is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

Development Plan Policies

- 5.15 The following policies of the **South Downs Local Plan** are considered relevant to this application and these policies are considered to be compliant with the NPPF:
- SD1 – Sustainable Development
 - SD2 – Ecosystem Services
 - SD4 – Landscape Character
 - SD5 – Design
 - SD7 – Relative Tranquillity
 - SD8 – Dark Night Skies
 - SD9 – Biodiversity and Geodiversity
 - SD10 – International Sites
 - SD11 – Trees, Woodland and Hedgerows
 - SD12 – Historic Environment
 - SD13 – Listed Buildings
 - SD15 – Conservation Areas
 - SD19 – Transport and Accessibility
 - SD20 – Walking, Cycling and Equestrian Routes
 - SD45 – Green Infrastructure
 - SD49 – Flood Risk Management

South Downs Partnership Management Plan

- 5.16 The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a vision and long term outcomes for the National Park, as well as 5 year policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications.
- 5.17 The following policies are considered to be of particular relevance to this application:
- General Policy 1 – conserve and enhance the natural beauty and special qualities of the landscape
 - General Policy 2 – develop landscape-scale partnerships and initiatives to focus on enhancing key ecosystem services
 - General Policy 3 – protect and enhance tranquillity and dark night skies
 - General Policy 4 – create more, bigger, better-managed and connected areas of habitat
 - General Policy 5 – conserve and enhance populations of priority species in and around the National Park
 - General Policy 9 – significance of historic environment is protected
 - General Policy 28 – improve and maintain rights of way and access land to provide a better connected and accessible network for a range of abilities and users
 - General Policy 29 – enhance the health and well-being of residents and visitors by supporting the use of the National Park as a place for healthy outdoor activity and relaxation
 - General Policy 31 – raise awareness and understanding of National Park, that inspire and celebrate strong sense of place
 - Transport Policy 37 – encourage cycling for both commuting and leisure purposes
 - Visitor and Tourism Policy 41 – maintain visitor enjoyment and influence visitor behaviour in order to reduce impacts on the special qualities
 - Visitor and Tourism Policy 43 – support the development and maintenance of appropriate recreation, tourism and visitor hubs
- 5.18 The outcomes of the SDPMP are also a material consideration. Relevant outcomes include 1, 2, 3, 4, 5, 6 and 8.

6. Planning Assessment

- 6.1 The main issues for consideration with regard to this application are:
- the principle of the development;
 - the design of the proposal;
 - the impact on landscape character including tranquillity and dark night skies;
 - the impact on ecology and biodiversity including a Habitats Regulation Assessment;
 - the impact on heritage assets, and
 - the impact on highway issues including access by Horse Riders.
- Principle of the Development
- 6.2 Policy SD20 of the SDLP seeks to safeguard the Chichester to Midhurst disused railway line for existing and potential future use as a non-motorised travel route and goes on to state development proposals that facilitate such uses will be permitted.
- 6.3 This proposal meets the aim of this policy in providing an extension to the existing pedestrian / cycle path and for the most part follows the line of the disused railway (where it does divert away from the railway line is assessed further in the following paragraphs). The route would provide improved access for a range of users including pedestrians, cyclists, the vulnerable and less abled and equestrians in part. The route would also link up with a wider network of rights of ways (including bridleways) and provides the opportunity for further future enhancements and expansion.

- 6.4 Overall, the proposal would provide an additional means for members of the public to access the countryside (including providing opportunities and enhancements for outdoor recreation and acting as a tourist attraction) and enjoy the special qualities of the National Park, including providing health and well-being benefits. Therefore, the principle of the development is considered accepted and in accordance with the policy in the SDLP.

Design and Landscape Character

- 6.5 The overall design (and proposed materials) of the path and other structures follow a 'do minimal' approach as the aim is to extend the existing quiet informal recreational route. For example, no lighting is proposed along the route. Therefore, it is considered that this overall design approach is entirely appropriate given the route's rural setting, the tranquillity which is currently experienced on the existing route and wider area and other nature conservation considerations (which are set out in more detail in the following paragraphs).
- 6.6 Where there are more substantial interventions, such as the replacement bridge at Littlewood Farm and the new timber ramp adjacent to Cocking Tunnel. It is considered the design solutions are sympathetic and appropriate to the architecture and heritage of the existing structures (as in the case of the bridge replacement), will help to minimise the visual impacts (as in the case of the new timber ramp adjacent to Cocking Tunnel) and are appropriate to the landscape character of the area.
- 6.7 Whilst the proposal includes fencing along the entire route which could be considered as visual clutter (particularly where the route diverts away from the railway line), it is considered that the fencing is a necessary solution to reduce the potential impacts to the designated sites (the railway tunnels), heritage assets and Ancient Woodland. In addition, the applicant is proposing additional hedgerow and tree planting along the route to help reduce the visual impact of the scheme. The design of the fencing is considered to be appropriate and to have a satisfactory appearance.
- 6.8 The planting of hedgerows and additional trees along certain parts of the route could be argued as uncharacteristic to the landscape. However, it is considered that in the wider landscape context they are an appropriate mitigation measure to reduce the visual impact of the route (and fencing) due to the wider area being wooded with hedgerows as field boundaries. In this case, it is considered that any landscape impacts caused by the additional hedgerow and tree planting are outweighed by reducing the visual impacts of the route (and fencing) and the wider benefits of providing an 'off-road' pedestrian and cycle route.
- 6.9 In conclusion, it is considered that the proposal is acceptable in design and landscape terms and is in accordance with the relevant policies within the SDLP.

Ecology and Biodiversity including Habitats Regulations Assessment

- 6.10 The application is supported by a number of ecological reports with additional work, including further bat surveys, being undertaken during the course of this application to address concerns raised by consultees. All the reports conclude that the scheme can be delivered without harm to protected species (bats, barn owls, badgers, reptiles and flora). This conclusion is supported and subject to securing the proposed mitigation measures (through appropriately worded planning conditions), it is considered that the scheme would not generally have a detrimental impact on ecology and biodiversity and is in accordance with SDLP policies. There are limited exceptions to this conclusion in relation to the Singleton and Cocking Tunnel SAC and SSSI, Ancient Woodland and net gains for biodiversity which are set out in more detail below.
- 6.11 As previously stated, the proposal is adjacent to and within Singleton and Cocking Tunnel SAC and SSSI. Where a project is likely to have a significant effect on the conservation objectives of a designated site (either alone or in combination of other plans or projects) and it is not directly related to or necessary for the management of the site, the Habitat Regulations require the competent authority to carry out an 'appropriate assessment' of the implications for that site's nature conservation objective(s). Singleton and Cocking Tunnel is designated due to the hibernating populations of Barbastelle and Bechstein's bats.

- 6.12 In this case, the applicant has provided information to enable that appropriate assessment to be undertaken. The information provided firstly clearly shows the route is being diverted away from all three tunnels to help avoid any direct impacts. West Dean Tunnel is included in this 'avoid' measure although it is designated as a Local Wildlife Site (and provides a supporting habitat for bats). The other impacts to Singleton and Cocking Tunnel considered (without mitigation measures) include:
- The proposed development would result in the loss of vegetation and trees along the route. These trees might support bat roosts or suitable bat roost features that would be permanently lost as a result of the development. There is a risk that without mitigation the loss and / or severance of existing commuting and foraging routes as a result of habitat loss could impact the integrity of the designated site.
 - The increase in cars to the Cocking Hill Car Park could result in an increase of vehicle exhaust emissions which might indirectly impact the designated site and surrounding habitat. The machinery used to construct the proposed route could also increase the amount of vehicle exhaust emissions in close proximity to the site.
 - According to the Institute of Air Quality Management Guidance on the assessment of dust from demolition and construction (January 2014), the area would be considered as a high sensitivity receptor, though combined with the small dust emission magnitude, the risk would be considered low.
 - The tunnels have been identified as being particularly vulnerable to impacts from increases in recreational pressure as a result of this proposed development. At present the tunnel portals are bricked and / or grilled to control human access but this is vulnerable to damage and vandalism and does not prevent human access to the portals. There is also potential for the increase in lighting from cyclists and walkers which could cause an impact on the bat behaviour, especially in areas near to the tunnel entrances.
- 6.13 The applicant has put forward a number of mitigation measures which include:
- The general 'avoidance' approach of diverting people and cyclists away from the tunnel portals. The route is over 140m away from both West Dean and Singleton Tunnels, whilst at Cocking Tunnel there is the provision of a ramped access to get users up and off the disused railway line onto Hoefield Lane;
 - Additional hedgerow and tree planting (a minimum of 2315sqm of hedgerow planting along the route alongside an area of 950sqm of woodland planting near Cucumber Farm) to provide habitat connectivity and planting species which be of value to the local wildlife (such as native seed and fruit bearing species to provide foraging opportunities);
 - Possible installation of additional bird and bat boxes;
 - Leaving log piles behind when site clearance works are undertaken to provide habitats for small mammals and invertebrates;
 - Maintenance and management of brash, bramble and non-native species, and
 - Signage and interpretation panels to inform users of the route of the designations and protected species (as well as the cultural heritage in and around the area).
- 6.14 The appropriate assessment concludes that there will be *'no likely significant effects on the Singleton and Cocking Tunnels'*.
- 6.15 It should also be noted, and as set out in the consultation responses, Natural England have stated that *'the appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that we concur with the findings of the HRA'*.
- 6.16 In conclusion, it is therefore considered that the proposed scheme would not have any significant effects on the integrity of the Singleton and Cocking Tunnel SAC and SSSI, and that it is necessary and appropriate to secure the mitigation measures in the form of

appropriately worded conditions to reduce the impacts the proposed scheme could have on these important nature conservation and local wildlife sites.

- 6.17 To avoid Singleton and Cocking Tunnel the proposed route diverts off the disused railway line into Ancient Woodland (Rock Wood and Wellhanger Copse) before diverting back onto the railway line at Littlewood Farm. For the most part the proposal will formalise (through the proposed materials and fencing) an existing track through the Ancient Woodland, with the exception of a relatively small section of the proposed route which will create a 'new' route from the existing track in Rock Wood up into Wellhanger Copse (which is open access land). This diversion results in the loss of approximately 1050sqm of woodland deemed to be an irreplaceable habitat, as set out in the NPPF and Policy SD9 of the SDLP.
- 6.18 Planning policies state that where development results in the loss of irreplaceable habitat, permission should be refused unless there are wholly exceptional reasons, such as where the public benefit would clearly outweigh the loss, and a suitable compensation strategy exists.
- 6.19 The application is not proposing direct compensation for the loss of this habitat, largely due to land ownership constraints. The applicant has suggested possible solutions set out below, some of which can be delivered through this application:
- translocation of ground flora (including fungi) and young tree saplings to other parts of the route and / or to suitable woodland habitats;
 - connecting woodland separated by development or other habitat types with hedgerows using appropriate local native species;
 - working with land owners to manage existing ancient and veteran trees and produce long-term management plans for the Ancient Woodland and the newly planted woodland proposed as part of this scheme;
 - planting individual trees that could become veteran and ancient trees in future;
 - to reduce recreational pressures and unintended straying of dogs off the route into the Ancient Woodland, the use of fencing and signage / interpretation panels;
 - working with land owners and other stakeholders to monitor the ecology of the site, and
 - planting new native woodland or wood pasture in other areas of the National Park.
- 6.20 Whilst it is acknowledged that this proposal is not providing direct habitat compensation in line with the NPPF and Policy SD9 of the SDLP, it is considered that there are wholly exceptional reasons (namely the creation of a new pedestrian and cycle route in a National Park in accordance with Policy SD20 of the SDLP and avoiding direct impacts to the Singleton and Cocking Tunnel SAC and SSSI) which demonstrate, in this case, the significant wider public benefits of the scheme outweigh the impact to the Ancient Woodland. It is, however, considered reasonable and necessary to secure some of the suggested mitigation solutions via suitably worded planning conditions.
- 6.21 As supported by the NPPF, Policy SD9 of the SDLP also states that development proposals will be permitted where it can be demonstrated that they have identified and incorporate opportunities for net gains in biodiversity.
- 6.22 This application is not proposing a measurable percentage of net gains for biodiversity. As set out previously, the proposal will be providing mitigation measures through the planting of additional hedgerows and trees to provide habitat connectivity and enhancements to the existing planting to support protect species. The applicant has also submitted a statement that given the constraints of land ownership, they would be willing to work with land owners and the Sussex Bat Group to explore opportunities to deliver new habitat connections equal to or exceeding 10% of the length of the proposed route. With the focus on delivering high quality habitats, potentially woodland, hedgerows and species rich meadows, with a specific focus on increasing species diversity using native species appropriate to the local setting (and to support the local bat populations). Some of these opportunities, such as the planting type and mix, can be secured through suitably worded planning conditions.

- 6.23 Given the planning policy context and against the specific circumstances of this application it is considered that this development has demonstrated potential opportunities for overall improvement to net gain in biodiversity, in accord with Policy SD9 of the SDLP (for example through enhanced planting to support local protected species) and as importantly enable the environment to deliver beneficial goods and services, including health and well-being benefits in accordance with Policy SD2 of the SDLP.
- 6.24 Overall, it is considered that providing a new pedestrian and cycle route (and the health and well-being benefits that that would bring) is in line with Policies SD1, SD2 and SD20 of the SDLP together with increasing people's understanding and enjoyment of the special qualities of the National Park, in this case, outweighs the lack of a measurable percentage in net gain for biodiversity and impacts to the Ancient Woodland.

Heritage Assets

- 6.25 Particular obligations fall upon the Authority in determining any application which involve a Listed Building(s) and Conservation Areas, as set out in Section 6 of this report. To clarify Singleton Station is a Grade II Listed Building and the station platforms are considered to be part of the curtilage listing. The other railway structures, such as the bridges and tunnels are deemed to be non-designated heritage assets. The start of the proposed route at the Scout Hut, opposite the entrance to West Dean College, is also adjacent to the West Dean Conservation Area.
- 6.26 The application has a number of different elements which could have an impact on a heritage asset. Whilst the proposed route does not have a direct impact on the building fabric or historic features of the Listed Building nor is within a Conservation Area, the assessment below has considered the impact to the setting of those heritage assets. In addition, the assessment below does include the direct impact on the non-designated heritage assets i.e. the railway bridges.
- 6.27 It is considered that the proposed fencing along the route would have modest adverse impact on the setting of the Listed Building (Singleton Station), however it is considered that such harm is less than substantial. Therefore, in accordance with the NPPF (as set out in Section 6) the less substantial harm caused by the proposal can be outweighed by the public benefits that the scheme presents. In this case the other public benefits, such as allowing people access to the former station and thereby revealing the cultural heritage of the area and encouraging people to enjoy and explore the National Park by using the route (including the health and well-being benefits), outweigh the limited impact caused by the fencing.
- 6.28 There is also some potential for very minor impacts to the setting of West Dean Conservation Area. However, these impacts are considered to be negligible and even if the harm were to be perceived it is greatly outweighed by the public benefits, already stated above, that the scheme would present.
- 6.29 In terms of the non-designated heritage assets (works to the various bridges), it is considered that the works proposed are mostly very modest interventions, that are of an acceptable visual appearance, which do not carry any significant potential for harm.
- 6.30 In conclusion, it is considered that overall this proposal would cause limited harm to a heritage asset but that harm is considered to be less than substantial, and is outweighed by the wider public benefits of the scheme (those benefits have been set out above).

Highways

- 6.31 Representations have raised concerns that the proposed route will largely exclude horse riders with the exception of the section between Hoefield Lane and Cocking Hill Car Park where the applicant has been able to negotiate with land owners access rights for equestrians. Presently there is no access for equestrians along the existing Centurion Way (albeit some sections do have private access rights) and this proposal is to extend that shared pedestrian / cycle route. Whilst it is unfortunate that the applicant has been unable to negotiate equestrian rights with the relevant land owners along the entire length of Phase 2, they have expressed support in pursuing wider rights for equestrians where access connections to bridleways (for example Bridleway 3365) can be achieved. However, this

does not form part of the determination of this application. In conclusion, it is considered that the lack of equestrian provision along the whole route is not unacceptable or detrimental to warrant a reason for refusal.

- 6.32 Representations have also raised concerns that the start of Phase 2 does not directly connect to the end of the existing Centurion Way and that pedestrians / cyclists will be diverted back onto the A286 which is perceived to be dangerous. For reasons set out above, any new route would have to be designed to divert around West Dean Tunnel, therefore due to this constraint (together with the existing land form and other buildings on site) any solution is likely to result pedestrians and cyclists having to use the A286 in part. This is not wholly unreasonable as the A286 is adopted highway and this section does have speed limit of 30mph which is considered suitable for use by cyclists. The applicant, in conjunction with the Local Highway Authority, is proposing a number of measures to improve the footway along the A286 between the end of existing route and the start of Phase 2 as set out in paragraph 1.10. Such measures are considered appropriate and therefore it is considered reasonable to secure them via a suitably worded planning condition.
- 6.33 In conclusion, it is considered that the scheme as presented in this application does not present a highway risk nor does have a detrimental impact to highway safety. Whilst an entirely off-road route would be preferred, it is considered that any impacts to access and highways are outweighed by the significant benefit of providing an alternative for pedestrians and cyclists, for the most part, away from roads.

7. Conclusion

- 7.1 It is considered that the design (of the route and other structures) and proposed mitigation measures are appropriate to the landscape character of the area and overall the proposal would make a significant positive contribution to the understanding and enjoyment of the special qualities of the National Park. The proposal would not have a detrimental impact on the character of the local area and it would conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- 7.2 It is also considered that the likely impacts of the development to the designated sites (Singleton and Cocking Tunnel SAC and SSSI) have been adequately assessed and the conditions recommended below would secure appropriate and acceptable mitigation measures to conclude that the overall scheme would not cause significant harm or have any significant adverse impacts.
- 7.3 In coming to this conclusion special attention has been paid to the desirability of preserving or enhancing the various heritage assets (both designated and non-designated) along the route and the character and appearance of the West Dean Conservation Area.
- 7.4 It is accepted that the proposal does have an impact on irreplaceable habitats, namely the Ancient Woodland, and does not provide a 'measurable' net gain for biodiversity. However, it is considered that the wider public benefits of providing a new pedestrian and cycle route with the National Park outweigh those negative impacts.
- 7.5 Therefore, it is considered that the proposal would accord with the relevant policies with the National Planning Policy Framework, the South Downs Local Plan, the South Downs National Park Partnership Management Plan 2014-2019 and the DEFRA Circular and purposes of the National Park.

8. Recommendation and Conditions

- 8.1 It is recommended that planning permission be approved subject to the conditions set out below.

Conditions

- I. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the plans and documents listed below under the heading 'Plans and Documents referred to in consideration of this application'.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. Notwithstanding the details shown on the approved plans, prior to the commencement of the development hereby permitted, unless otherwise agreed in writing by the Local Planning Authority, a schedule of all materials and finishes to be used in the development, including samples where requested, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in full accordance with the approved schedule and samples.

Reason: To safeguard the appearance of the development in the interest of conserving and enhancing the heritage assets and landscape character of the area.

4. Notwithstanding the details shown on the approved plans, prior to the commencement of the development hereby permitted, unless otherwise agreed in writing by the Local Planning Authority, details of the soft landscaping associated with the permitted development shall be submitted to and approved in writing by the Local Planning Authority. The plans shall include, but are not limited to, the following:

- species,
- planting sizes,
- planting methods including tree pit design and support proposals (underground guying etc),
- ground preparation,
- surface dressing, where appropriate,
- grassing / turfing operations,
- seed mixes,
- written specification for soil amelioration including cultivations, planting methodology, establishment and maintenance operations, and
- other ecological mitigation and enhancement measures.

Reason: In the interests of amenity and to conserve and enhance the landscape character and biodiversity of the area.

5. All soft landscaping works shall be carried out in accordance with the approved details (in accordance with Condition 4) and in the first planting and seeding season following when the development is first brought into use. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: In the interests of amenity and to conserve and enhance the landscape character and biodiversity of the area.

6. No works pursuant to this permission shall commence until a Construction Environmental Management Plan, to include:

- site compound location details,
- construction vehicle routing,
- deliveries timing,
- the provision of loading / offloading areas,
- wheel wash facilities,

- storage of plant,
- site office,
- contractors parking area,
- details of security hoarding,
- measures to control emission of dust and dirt,
- measures to control noise and vibration,
- a scheme for recycling / disposing of waste resulting from construction works, and
- ecological mitigation measures, including method statements and measures to be adopted to avoid impacts on the designated sites, protected species and other important habitats.

has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be implemented and maintained until the development is complete unless otherwise agreed in writing by the Local Planning Authority.

Reason: To enable the Local Planning Authority to control the development in the interest of maintaining a safe and efficient highway network, in the interests of amenity, to conserve and enhance the landscape character and biodiversity of the area and to ensure no adverse impacts on protected species.

7. Before the development hereby permitted is first brought into use, a landscape and ecological management plan, including the management objectives and responsibilities and maintenance schedules for a minimum of five years for all of the development and a detailed scheme for the protection / security of the designated tunnels and monitoring commitments, shall be submitted to and approved in writing by the Local Planning Authority. Maintenance shall be carried out in accordance with the approved details.

Reason: In the interests of amenity and to conserve and enhance the landscape character and biodiversity of the area.

8. Before the development hereby permitted is first brought into use, a programme of works to the A286 footway from Motor Road to the start of Phase 2 (opposite the entrance to West Dean College) including a timetable for those works (such works shall be in accordance with the submitted South Downs National Park Authority, Access Team Supplementary Response, 19th June 2019), shall be submitted to and approved in writing by the Local Planning Authority. The highway works shall be carried out in accordance with the approved details.

Reason: In the interests of maintaining a safe and efficient highway network, interests of amenity and to conserve and enhance the landscape character of the area.

9. Before the development hereby permitted is first brought into use, a Signage and Interpretation Strategy (including indicative location, size and types of signs) informing people of special qualities of the National Park and the various designations and cultural heritage along the route, shall be submitted to and approved in writing by the Local Planning Authority. Any proposed signage and interpretation boards shall be carried out in accordance with the approved details.

Reason: In the interests of amenity and to conserve and enhance the landscape character (including cultural heritage) and biodiversity of the area.

10. No external lighting shall be installed within the site unless otherwise agreed in writing by Local Planning Authority.

Reason: To enable the Local Planning Authority to control the development in the interests of night time amenity, tranquillity and to protect and conserve the International Dark Night Skies Reserve.

9. Crime and Disorder Implications

9.1 It is considered that the proposal does not raise any crime and disorder implications as the overall design principles used for this scheme as followed best practice in ‘designing out crime’.

10. Human Rights Implications

10.1 This planning application has been considered in light of statute and case law and any interference with an individual’s human rights is considered to be proportionate to the aims sought to be realised.

11. Equality Act 2010

11.1 Due regard has been taken of the South Downs National Park Authority’s equality duty as contained within the Equality Act 2010.

12. Proactive Working

12.1 In reaching this decision the South Downs National Park Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included pre-application discussions to ensure that the development brought forward conserves and enhances the natural beauty, wildlife and cultural heritage of the National Park.

TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer: Kelly Porter

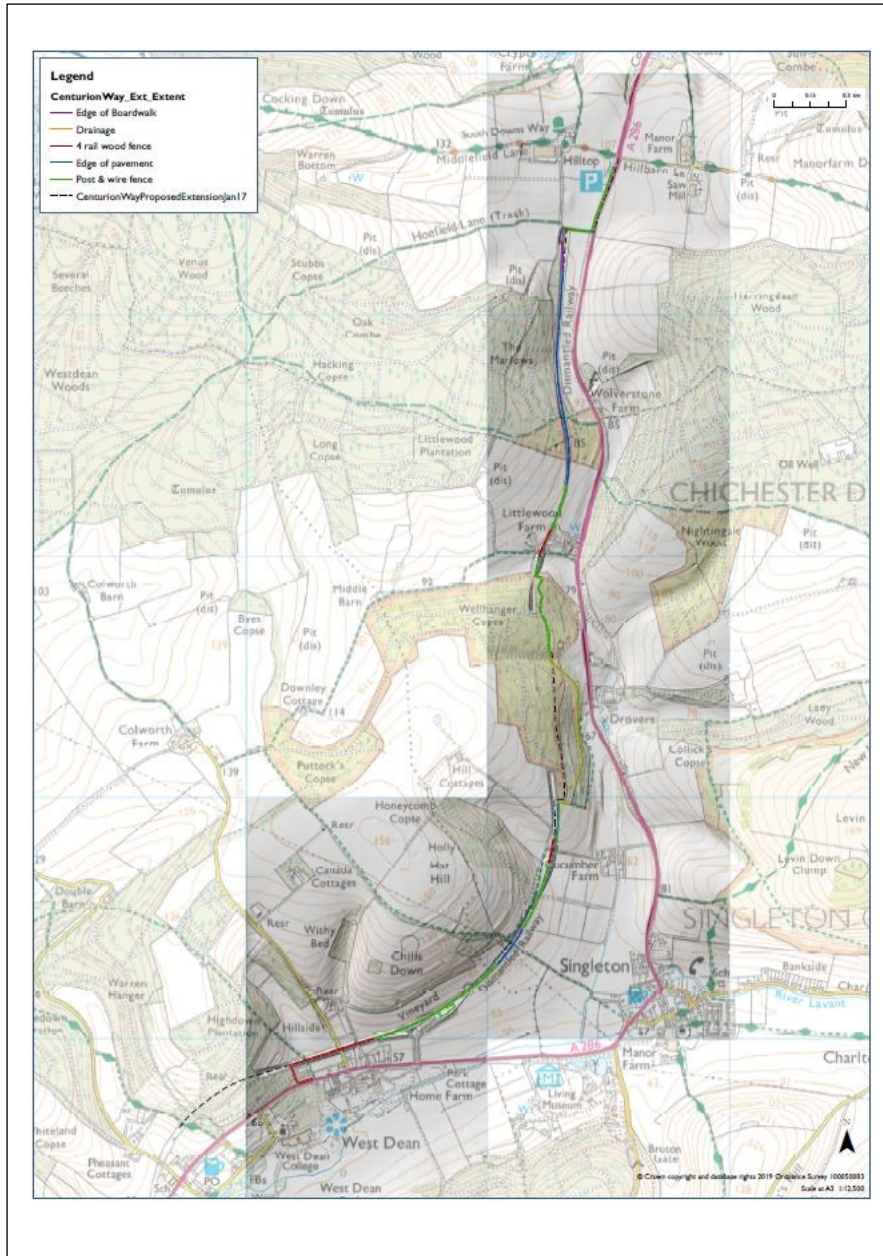
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Appendices
1. Site Location and Phasing Plan
2. Plans and documents referred to in consideration of this application

SDNPA Consultees Legal Services & Major Planning Projects and Performance Manager

Background Documents [All planning application plans, supporting documents, consultation and third party responses for SDNP/18/05920/FUL](#)
[National Planning Policy Framework 2019](#)
[South Downs Local Plan](#)
[South Downs National Park Partnership Management Plan 2014-2019](#)



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Plans and Documents referred to in consideration of this application

The application has been assessed and recommendation is made on the basis of the following plans and documents submitted:

Plans and Documents		
Drawing Number	Rev No.	Title of plan / document
OTB-16-025-DD-DR-0014	03	Location Plan
OTB-16-025-DD-DR-0015	06	Site / Block Plan
OTB-16-025-DD-DR-0015A	02	Site / Block Plan
OTB-16-025-DD-DR-0016	06	Location Plan
OTB-16-025-DD-DR-0017	06	Site / Block Plan
OTB-16-025-DD-DR-0018	06	Site / Block Plan
OTB-16-025-DD-DR-0019	06	Site / Block Plan
OTB-16-025-DD-DR-0020A	03	Site / Block Plan
OTB-16-025-DD-DR-0020B	03	Site / Block Plan
OTB-16-025-DD-DR-0020C	03	Site / Block Plan
OTB-16-025-DD-DR-0021	06	Site / Block Plan
OTB-16-025-DD-DR-0022	05	Site / Block Plan
OTB-16-025-DD-DR-0023	05	Site / Block Plan
OTB-16-025-DD-DR-0024	05	Site / Block Plan
OTB-16-025-DD-DR-0025	05	Site / Block Plan
OTB-16-025-DD-DR-0026	07	Site / Block Plan
OTB-16-025-DD-DR-0027	06	Site / Block Plan
OTB-16-025-DD-DR-0008	05	Cocking Boardwalk Ramp – Plan View Ramp, Concept Design
OTB-16-025-DD-DR-0009	03	Cocking Boardwalk Ramp – Longitudinal Section Ramp, Concept Design
OTB-16-025-DD-DR-0010	03	Cocking Boardwalk Ramp – Cross Sections Ramp, Concept Design
OTB-16-025-DD-DR-0012	04	Singleton Footpath Connection, Plan View for Earthworks Option
OTB-16-025-DD-DR-0013	02	Singleton Footpath Connection, Cross Sections for Earthworks Option
OTB-16-025-DD-DR-0031	05	Underbridge 5, Littlewood Farm Bridge, Plan and Elevation Concept Design

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Plans and Documents		
Drawing Number	Rev No.	Title of plan / document
OTB-16-025-DD-DR-0032	02	Underbridge 2, Parapet, Concept Design
OTB-16-025-DD-DR-0033	03	Gate Types, Bollard and Chicane Details & Planting Schedule Tables
OTB-16-025-DD-DR-0034	02	Shared Path Drainage Details
OTB-16-025-DD-DR-0035	02	Shared Path Cross Section Details
OTB-16-025-DD-DR-0040	01	Singleton Tunnel South Portal & Special Area of Conservation
OTB-16-025-DD-DR-0041	01	Singleton Tunnel North Portal & Special Area of Conservation
OTB-16-025-DD-DR-0042	02	Cocking Tunnel South Portal & Special Area of Conservation
		Reptile Survey, November 2017 produced by Phlorum
		Badger Report, October 2018 produced by South Downs National Park Authority and Schofield Lothian
		Habitats Regulations Assessment of the Proposed Centurion Way Phase 2 Route, June 2018 produced by South Downs National Park Authority and Schofield Lothian
		South Downs National Park Authority, Access Team Supplementary Response, 19 th June 2019
		Preliminary Ecological Appraisal, September 2019, produced by South Downs National Park Authority and Schofield Lothian
		South Downs National Park Authority, Landscape and Biodiversity, 18 th September 2019

Reasons: For the avoidance of doubt and in the interests of proper planning.

