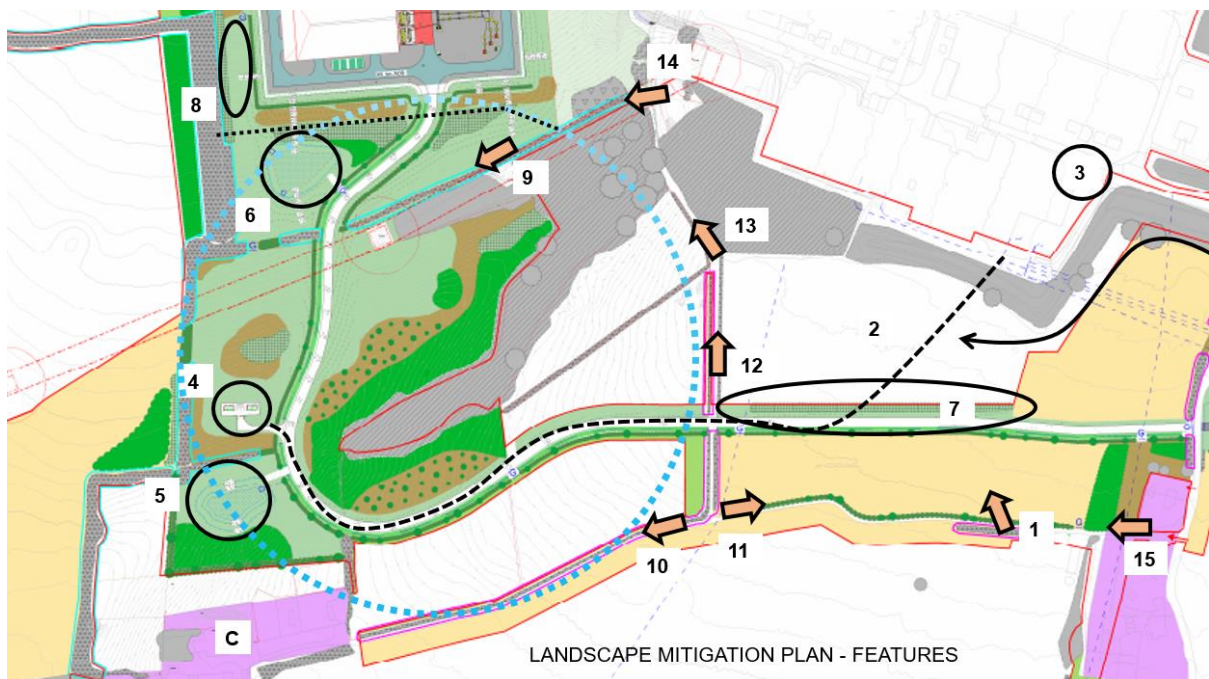


APPENDIX J Proposed Landscaping: Excessive Unjustified Land Take.

1. Section 183 of the Planning Act 2004 amended section 39 of the Planning Act 2004 (sustainable development) to include: "(2A) For the purposes of subsection (2) the person or body must (in particular) have regard to the desirability of achieving good design." This is not an absolute obligation but is an aspiration: "the desirability of". EN-1, section 4.5 addresses "Good Design" and paragraph 4.5.3 notes the importance placed by the Planning Act 2008 on "good design" and provides that "the IPC needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the IPC should satisfy itself that the applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible... ."
2. The extent of the land take for the Application development remains unjustified, unlawful and is required to be carefully scrutinised. That scrutiny reveals that more land than is necessary for the Application development has been included and either a protective provision or Requirement appears necessary by which to ensure a match between the extent of the Order Limits that is lawfully justified and that shown on the Land Plans as the proposed Order Limits (we have drafted a draft schedule 13 accordingly to the draft DCO and submitted this at Deadline 5).
3. The diagram below shows the Indicative Landscape Proposals of the Applicant and to which our Clients' have applied diagrammatic elements for ease of understanding.



4. The starting point is that, when carefully scrutinised, the Landscape proposals that show one way that the Landscape Framework terms may result in their application, are evidently unnecessary and the extent of the Landscape proposals has been amplified. A more sustainable result can be ensured by significantly less land take and the Application development can be accomplished through significantly less onerous land enabling powers and residual emergency planning and decommissioning rights than the Applicant seeks over our Clients' land (shown

diagrammatically above essentially meaning that the area in the blue dashed circle in the diagram above can be excluded from the land take), adjacent land, and the geographical extent of those powers that are sought.

5. The Applicant seeks a range of rights over different parts of our Clients' land that include landscape rights of certain plots and permanent acquisition of other land. Plot 1-32 of our Client's land is identified as "*Works No. 2 Works to Construct the Converter Station*" (Works Plan APP-010(a)) and the Applicant contends that all of Plot 1-32 is required to be permanently required (Land Plan APP-008(a)) for the delivery and operation of the Converter Station.
6. It is difficult to identify a rational basis for permanent acquisition of some land, mere new landscape rights over adjacent land, or their extent, that is in the national interest, necessary or essential to make the Converter Station or sub-surface cables or temporary construction-related development permanently acceptable, or required.
7. Our concern arises from a number of initial and obvious considerations as set out below.

Amplification of land take – commercial convenience?

8. **Firstly**, the proposed native mixed woodland belt of up to 15m (Features Plan #7 above and Landscape Mitigation Plans APP-281 and APP-282) which is situated north of the proposed access road to the east of our Clients' land.
9. What is the national interest in this envisaged proposal and why is it essential or required? It is difficult to identify a rational basis in the national interest or that it is essential.
10. It may be asserted that it assists in softening the impact of the new access and reflects the hedgerow edge roads of the vicinity and, secondly, it will bring some new biodiversity benefit. However, does it screen anything and, if so, what?
11. With reference to the DAS and ES (containing a VIA) prepared in support of National Grid's consented application for the extension of the Lovedean Sub-Station (ref: 13/01025/FUL) immediately to the west of the existing Lovedean Sub-Station, which we note has not been identified in the short list of developments document (APP-485), the photomontage identified as View 6 at Section 5 page 29 of the DAS shows clearly the field, in Winter, through which the proposed access road would run E-W (Features Plan #1). See below. We refer to the landscape chapter of that ES .

View 6 (Winter) towards Lovedean Substation and proposed extension



12. Given the mature thick woodland belt (called Crabdens Row) immediately to the southern boundary of Lovedean Sub-Station which joins Crabdens and Stoneacre Copses and the fact the proposed northerly belt (Features Plan #7) is also native mixed woodland species containing predominantly deciduous and some evergreen

species, it is difficult to see how the Application landscape proposals would offer no additional screening benefit, winter or summer, and this is reinforced by the oblique angle of the proposed Converter Station westwards.

13. Indeed, below is an image of the maturity and density of Crabdens Row in the summer:



14. What this proposed planting strip (Features Plan #7 and shown black dashed line in the image above) would achieve, as a matter of fact, is no more than a screening of the northerly half of an existing agricultural field in the *short* highly localised view and a demarcation of the boundary of what would be a newly created smaller field. That is, a vegetated boundary would be created.
15. We then ask the ExA to consider why that woodland hedgerow would be considered necessary when there is no obvious need for it to be located in that location for the Proposed Development?
16. We consider an answer to this question may lie in the Applicant's option to acquire land immediately north of the extent of land proposed to be acquired for access. The northern land was subject to proposals for a battery storage facility to the south of the existing Lovedean Sub-Station (capable of generating just shy of the 50 MW capacity to require a DCO). We refer the ExA to document APP-485 which lists this theoretical future development as Development 67.
17. It is noticeable that the boundaries of the Order Limits exactly replicate, by carving out, this theoretical development area which is proposed for Development 67 (Features Plan #2), and that mirrors the extent of the land over with the Applicant has an option. The red and blue line boundary of Development 67 is shown below in the site location plan for the National Grid application:



18. The underlying reason for proposing the 15m hedgerow screening along the northern boundary of the access road then becomes clearer. It is predominantly proposed to commence the screening (whether in whole or part) of this other development.
19. The alternative to reliance on future theoretical development to justify the extent of land take is the evident basis of the amplified extent of land take (and related landscape) based not on need for it from the Application development either but due to a mere convenience, to match the extent of the land over which the Applicant has an option.
20. This alternative is revealed by Land Registry title [REDACTED], at entries 9 and 10 of the charges register, which show that the Applicant has an option agreement in place from January 2019 with the current owners The Warden and Fellows of Winchester College.
- 9 (14.01.2019) UNILATERAL NOTICE affecting the land edged blue on the title plan in respect of an option to acquire contained in an agreement dated 21 December 2018 made between (1) The Warden and Fellows of Winchester College as trustees of The Winchester College Foundation and (2) Aquind Limited.
- 10 (14.01.2019) BENEFICIARY: Aquind Limited (Co. Regn. No. 06681477) of OGN House, Hadrian Way, Wallsend, NE28 6HL.
21. The extent of this option land shows that the Order Limits (e.g. for Works No 2 shown on Works Plans Sheet 1 in light green in Document Ref: 2.4) abut the extent of the optioned land in the Applicant's favour. That is, that the Order Limits are in this location, by way of example, driven not by the need of the Application development proposals but by a desire of the Applicant to align its land take with its disparate land interests in this area.



22. From the outset therefore, there appears to be a degree of strategic land assembly underlying the Proposed Development linked to other development proposals, which in combination provide much greater opportunities for the Applicant to pursue and justify additional future lucrative development.
23. This amplification of Order Limits driven by commercial land acquisition convenience, rather than by the provision of a Converter Station or sub-surface electricity cables,

becomes evident when the recent permission for a 30m high Telecoms Mast is considered and which is identified as Development 70 (APP-485) (Features Plan #3) which is, conveniently, located just to the north of the option land on the other side of the existing woodland belt, Crabden's Row. i.e. the current Land Plans and Works Plans enable a land bridge between the Application Development, a theoretical future development for a large battery storage facility, and proximity to an approved Telecommunications Mast.

24. However, the real existing situation is that the land take immediately south of the option land shown above is that it is categorised by the Applicant, in its Appendix 17.2, Agricultural Land Classification and Soil Resources, ES, Volume 3, Document Ref: 6.3.17.2, Auger Observation Areas 3, 5 and 6, and Figure 17.2, as "sub-grade 3a – good quality". In cross referring that Figure 17.2 and comparing it with Works Plans, Sheet 1, Document Ref: 2.4 and the extent of the option land outlined in blue, together with the description of development of a construction access way in paragraph 3.6.3.27 of ES, Volume 1, Document Ref: 6.1.3, of "no wider than 7.3m", together with the scaled width of that Works Plans area (excluding a construction compound) being shown as some 25-35m, and consideration of Indicative Converter Station Layout Plans, Options B(i) and (ii), Drawing EN020022-2.7-LAY-Sheet2, Document Ref: 2.7, and Plate 5.31 of the Design and Access Statement (Rev 2), Document Ref: 5.5, showing the access road within the wider land take, it is difficult to see how more than 7.3m of width can be lawfully justified, i.e. the only rational basis for a wider extent appears to be the commercial convenience for the Applicant to unify its land interest of the option land with its proposed land interest in the Application.
25. We consider that the extent of land take remains unjustified for the purposes of the Planning Act 2008 and sections 115 and 122.

Telecoms buildings

26. **Secondly**, reflecting the same the concern at the amplification beyond the land take necessary (as opposed to merely convenient for the Applicant) shown above, we ask the ExA to carefully scrutinise the basis for the Applicant seeking two Telecoms Buildings (APP-281 and APP-282 and Features Plan #4) on our Clients' land in an isolated location away from the CS whilst adjacent to a proposed permanent access road and made up to a standard far in excess of what could be permanently justified (for 3-4 light vehicles annually) beyond the initial construction phase.
27. In fact, what the particular choice of positioning of these elements does is to create a southern linkage westwards from the proposed Telecoms Buildings, under and along the proposed permanent access road (which is to remain in situ throughout the lifetime of the Proposed Development), enabling a route in the Applicant's proposed control north through the proposed native hedgerow, through the land in the Applicant's control – its option land (Features Plan #2) - and linking to, for example, the Telecoms Mast (Features Plan #3) within the existing Lovedean Sub-Station and Order Limits.
28. The future development of the approved Telecoms Mast appears facilitated by convenience but not essential land assembly.
29. Contingent upon this 'desired' but not required or essential Telecoms Buildings infrastructure, the landscaping proposals are predicated upon, and asserted to be justified across an extensive tract of our clients' land (Plot 1-32 Land Plan APP-008(a)) to be purchased or over which extensive rights are to be acquired. However,

there remains no need for the landscaping proposals nor for the permanent acquisition of our Clients' land to ensure the provision of such local landscaping, however desirable the choice by the Applicant of a different form of local landscape appearance and visual appearance may be in place of the current rolling arable fields of our Clients' land and around their farm buildings.

No real 'need'

30. Therefore, **thirdly** we take in turn some of these landscaping proposals and show there is no real need for them.
31. Underlying the discussion on the following points is the lay of the land itself and the effect that *localised* topography has on visual impact and landscape mitigation.
32. Our Clients' farm buildings and property is circa 20m *lower* AOD than the proposed Converter Station pad level on the Northern part of their land and according to the contours shown on the landscape mitigation plans (APP-281 and APP-282). Therefore, that Station would be set above our Clients' remaining land by some distance. As a consequence, any new features impose themselves more so than they would in a flat landscape over a relatively short distances. A principle is that landscape mitigation *nearer* to the affected receptor can be more effective, and, in this scenario, in dealing with visual impacts than mitigation would be if located nearer to the Proposed Development feature creating that impact. But, that principle here puts the Telecoms cart before the Converter Station horse.
33. This principle creates a theoretical narrative for landscape mitigation screening the northern boundary of our Clients' proposed retained land based on the permanent proposed situation the access road and its related attenuation pond, two Telecoms Buildings and Converter Station all contain the potential of having more visual impact than they may otherwise have in a flat landscape due to the rising ground.
34. Taking each one of those features in order:

(a) The access road.

(i) Our Clients understand the construction phase justification for heavy wheel-based articulated vehicles will be needed for the construction of the Application development but there is no rational justification for a permanent 7.3m wide tarmac roadway over their land in perpetuity or beyond that initial construction-related phase.

(ii) In fact, in the 21st century, temporary haul road options exist which could be more than adequate to install along the alignment of the proposed access. These could include geo-matting, timber matting, geosynthetic cellular confinement systems and even soil chemical solutions. Such options may reduce the need for localised re-profiling too but appear not yet to have been explored by the Applicant as less intrusive measures by which to construct the Converter Station because of the quite outline stage of the Application development.

(iii) Once the construction phase is complete, the heavy-duty temporary haul road solution could be removed and our Clients' agricultural fields returned to pasture and their ability to accommodate livestock. The existing north-south track along the Eastern boundary of our Clients' land could be allocated for use (secured by a planning obligation for access for 3-4 annual

trips by light vehicles to the unmanned convertor station) and which is a Track more appropriate and commensurate to the Applicant's envisaged annual maintenance requirements. Images of this Track as it currently exists, and remains in and suitable for such use, are as follows:



(#11)



(#12)



(#13)



(#14)

(iv) This less intrusive approach could allow the Application development to be constructed and the unmanned Converter Station adequately maintained during operational phase whilst avoiding extensive landscape features and significant permanent land take for what would be an over specified permanent impermeable tarmac road which, due to the fact that it winds up the hill towards the Station site, otherwise has visual impact in itself falling to be considered for mitigation.

(b) Attenuation pond.

(i) The natural outcome of proposing an unnecessary permanent impermeable access way throughout the operational phase is that pluvial runoff and the topography generate a permanent need for an attenuation pond at the lowest point of the proposed access road (#5 Features Plan).

(ii) In the absence of such a permanent access road to allow for maintenance related access via the alternative solution proposed following the reinstatement of our Clients' pasture land there is no need for the proposed southerly attenuation pond.

(iii) This immediately removes the Applicant's purported need for this area of our Clients' land for an attenuation pond.

3(c) Telecoms Building

(i) For the reasons given in Schedule 4 to the Clients' Written Representations for Deadline 4, there is no lawful nor otherwise any, justification for the provision "for commercial telecommunications" infrastructure" on our Clients' land because it cannot be part of the

Application development and is otherwise unjustified as required and is merely commercially 'desired'.

(ii) However, the presence of these buildings on our Clients' land and close to the farm buildings below them results to generate a landscape proposal. Moreover, in relation to the proposed mitigation landscaping to the northern boundary of our Clients' retained land (as shown in Schedule 4 to their Written Representations), the asserted justification relates to the very localised screening of the impact of the Telecoms Building in our Clients' the immediate view. The existing hedgerow immediately to the south of the proposed Telecoms Building are proposed to be gapped up and between it and the Telecoms Buildings scrub is envisaged to be established.

(iii) However, without a lawful justification for the unmanned Telecoms Buildings being necessarily required for the Application development, and without rational justification (as opposed to commercial convenience) in the proposed location isolated from the situation of the equipment housed within the Converter Station, the justification for the landscape embedded mitigation linked to this element remains merely asserted out of commercial desire and convenience and cannot be essential or required for the Application development.

(iv) In the absence of lawful or any justification for the telecoms building in this location, then a related need for it be accessed from the access road is removed also, as too is the need for the attenuation pond which would also serve the impermeable pad for the Telecoms Buildings related run off.

This reduces the extent of the (permanent) land take from our Clients' land.

35. Further, in relation to these infrastructure elements the Applicant's VIA (APP-130) summarises the operational stage effects as follows:
- In relation to the year 0 effects, "*the Access Road both west and east of Broadway Lane would remain a noticeable feature giving rise to a moderate adverse permanent medium-term (significant) effect*" (para 15.8.4.9);
 - In relation to the year 10 effects, "*Whilst the sensitivity would remain as medium, the magnitude of effect would reduce to small resulting in a direct minor adverse permanent long-term localised (not significant) effect*" (para 15.8.4.14); and
 - "*By year 20 effects on infrastructure would remain unchanged as direct minor adverse permanent long-term localised (not significant) effect*" (para 15.8.4.19).
36. The alternative, lesser intrusive measures of removing the access road following construction of the Converter Station and burial sub-surface of the electricity cables under their land, and having regard to the unlawful nature of the Telecoms Buildings and fibre optic cable link to its "for commercial telecommunications" on and under our Clients' land, would negate the above otherwise significant impacts at all stages of the operational phase and reduce the extent of permanent land take envisaged for the Application development.

Converter Station

37. In relation to the Converter Station, our Clients consider the position to be as follows. Our Clients accept that the situation of a Station is justified for what it understands to be the usual period of 125 years for a piece of public infrastructure. This leaves only its visual impression during that period to be considered. The Applicant's position is that due to their careful siting of the Application development that the visual impact is predominantly *localised* and it has a remarkably limited impact on longer and protected viewpoints, wider and designated landscapes despite, especially as the embedded mitigation matures. In particular, the National Park would be unaffected (much in line with the lack of effect of the Western Extension of the Sub-Station on that Park). We highlight to the ExA that the effects are *local* because, in essence, the result of the Applicant's landscape proposals and their permanent extensive land take, is to take our Clients' land against their will in order to impose on them a different view than that of the existing rolling arable fields. In their own view, the taking of their land against their will seems an unreasonably high price to be imposed on them for a change of visual scene. It is also difficult to see how compulsory acquisition of land could be justified for a mere change of view, including because there is no right to a view.
38. The Applicant focusses on its so-called 'embedded mitigation' to minimise the adverse effect on localised receptors. Such embedded mitigation appears to be no more than a choice of design approach, itself a choice and not a requirement resulting from the Application development. 39. The Environmental Statement, Volume 1, Chapter 15 Landscape and Visual Amenity (APP-130) refers to residential properties identified on Figure 15.47 (Residential Properties and Settlements (APP-280)). Our Clients' properties are identified as numbers **11** and **12** and fall within the 1.2km receptors assessed in the LVIA chapter as follows: (Bold and underlined emphasis added).
- There would be significant visual effects and in relation to our Clients' properties there would be "*major adverse (significant) effects*", *during construction* (para 15.8.3.10);
 - In year 0, "*South of the Converter Station (Nos. 10, 11, 12 and 13): The worst affected receptor (No.12) would be subject to a **major adverse significant effect**. There would be a moderate-major adverse (significant) effect for No.10 and a minor/moderate adverse (significant) effect due to proximity for Nos.11 and 13" (para 15.8.4.24);*
 - In year 10, "*south of the Converter Station (Nos. 10, 11, 12 and 13): **As a consequence of new planting situated to the north of properties there would be a direct change to the depth and composition of view for No. 12 resulting in a medium magnitude of change and a moderate-major neutral (remaining significant) effect**. For Nos. 10, 11 and 13 **effects would be minor-moderate (significant due to their proximity to the Converter Station)**" (para 15.8.4.25); and*
 - In year 20, "*south of the Converter Station (No 10, 11, 12 and 13): The **effect on No.12 would remain unchanged as moderate-major neutral (significant) whilst for Nos. 10, 11 and 13 the effect would be minor-moderate adverse (not significant as planting reaches maturity)**" (para 15.8.4.26).*
40. It is recognised that the construction phase impacts will be inevitably adverse. The worst effects on visual matters would be at year 0 when any proposed change in vegetation is at its smallest. At its height, in that year, the worst effect in No 11 is a "minor/moderate significant adverse effect" and this is exclusively due to "proximity". After that, the changes result from the vegetation and result in year 20 from a change from "minor/moderate adverse (significant) ... to minor-moderate adverse (not significant)". This appears to be a net no difference and is consistent with the landform or difference in elevation also.

- 41. However, thereafter those impacts should be considered in light of the existing landscape elements.
- 42. The landscape character of the Clients' land and vicinity is an expansive, "rolling" arable landscape. It is an area of undulating rolling landform of predominantly arable use. The existing substation, pylons and overhead cables are visible elements within local views which are moderated by the gently undulating landform and mature vegetation surrounding the substation. The tops of gantries are visible above the tree line and between gaps in vegetation. See paragraphs 1.5.1 and 1.5.2 of the ES, Appendix II for the Sub-Station in **Appendix 2** hereto.
- 43. At the same time, it is a landscape in the immediate vicinity of the Converter Station where the existing pylon infrastructure already crosses the Clients' land and *already* consistently breaks the tree line in height, considerably so, and is of a highly repetitive non-natural form and alien character. Such electrical infrastructure is a dominant landscape element in the immediate surrounding area as accepted by the Applicant (APP-130 para 15.5.3.4). That dominance is increased by the presence of those forms on elevated ground above the Clients' farm buildings and generally higher than their land. The Applicant's Converter Station would be situated North of that existing infrastructure and behind it when observed from the Clients' farm buildings and lower lying land.
- 44. For example, the images below show this:

IMAGE 1. The Applicant's Environmental Statement (APP-254) viewpoint 4:

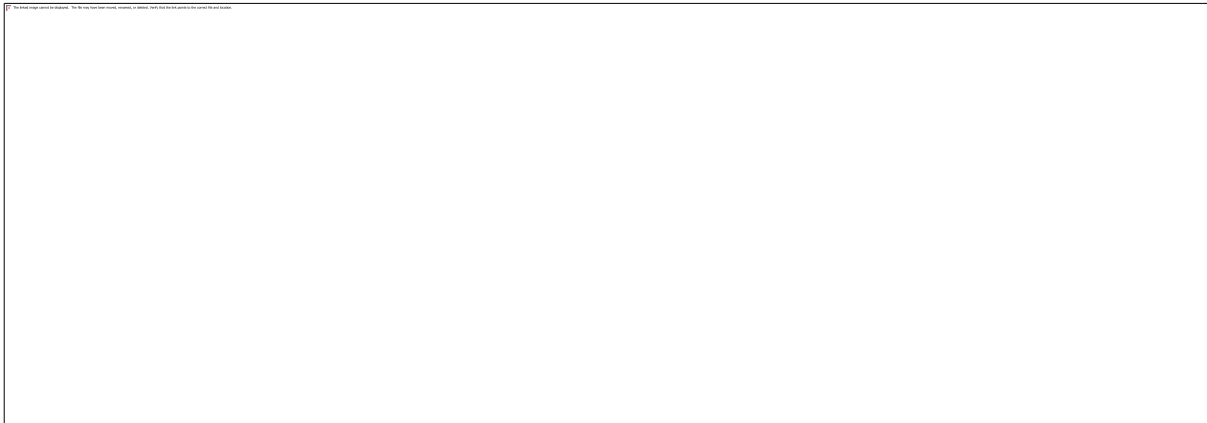


IMAGE 2. The Applicant's Environmental Statement (APP-260) viewpoint 10:



IMAGE 3. National Grid's Environmental Statement Appendix M, View 4a, which is from a viewpoint along Crooks Lane immediately to the west of our Clients' property, and is effectively the landscape they look onto and reveals the real dominance of the pylon infrastructure:



IMAGE 4. The Applicant's Environmental Statement (APP-268) Viewpoint A:



IMAGE 5 It is behind this existing electricity pylon infrastructure that the Converter Station would be situated in our Clients' view. Shown below the Station would be to the right, our Clients' viewing the same from the left:



(#9)

In addition to this, extensive tracts of agricultural land in the vicinity are already punctuated by large visually utilitarian barns, sheds and other agricultural buildings that are uncompromising in their bulking and mass in the natural landscape and part of its working rural character.

Local examples are as follows:

IMAGE 7. Barns (#15) at the start of Footpath [x]



IMAGE 8Barns (from #10)



IMAGE 9 National Grid's Environmental Statement Appendix F View 1a (from the north looking south to the existing Substation)



45. All of these highlight the point that bulky utilitarian farm buildings co-exist in this landscape with electricity infrastructure of pylons and also of the Lovedean Sub-Station on which the various pylon lines converge in particular immediately North-West of our Clients' land. See Landscape Context Plan, Ref: 15/SWA/5547311/P3 relating to the Substation of the ES supporting the Western Extension.
46. It is clear therefore that our Clients' live in and amongst the juxtaposition of these two visual worlds: on the one hand a landscape of purely natural man-made rolling agricultural fields lined with hedgerows and interspersed with pockets of woodland; on the other hand uncompromising agricultural buildings overlain, in this location particularly, by a domineering aerial infrastructure which maintains the modern world.
47. Therefore, the envisaged and extent of the proposed design choice of so-called 'embedded' landscape mitigation appears unjustified in an existing hybrid situation in which our Clients' already reside and which seeks to take a large part of their land against their will so as to effect the Applicant's design preference for a *local* difference in vegetative view (because the pylons would remain domineering in the view).
48. The proposed 'embedded mitigation' includes emboldened woodland belts, adding new stands of woodland and scrub in a landscape that is predominantly open and rolling agricultural land interspersed with existing electricity infrastructure. See, for example, the views referred to above and also Landscape Context Plan, Ref: 15/SWA/5547311/P3 relating to the Substation of the ES supporting the Western Extension that shows the "existing hedges or hedgerows" and "existing trees or shrubs". In this respect, a comparison of the Land Plans, Sheet 1, shows "new landscape rights" (and not "permanent acquisition") relating to various vegetative strips around the perimeter of our Clients' land. E.g. Plots 1—49, 1-58, 1-44, 1-56 all appear to be existing hedges and are also not proposed to be taken permanently whereas landscape within the boundary of such boundary features is proposed to be permanently taken. See Plot 1-32. The approach of the Applicant to land take appears idiosyncratic and, again, driven by commercial convenience and not need or a requirement.
49. Our Clients have and maintain their objection to the taking of their land against their will whereas the landscape proposals on land permanently taken from them would prevent also their farming activity on that land.
50. Given that the Converter Station is to be screened immediately adjacent to it, some of which is on new bunding created from the Station pad re-profiling works and the fact the Station may clad in sympathetic materials and colours (see indicative

photomontage from the Applicant's Environmental Statement (APP-268) Viewpoint A, see below), and that visual impression is ultimately subjective and beauty like benefit is in the eye of the beholder, the visual impression of the Station in a landscape dominated by existing pylons would likely be less visually intrusive than a lot of the existing agricultural buildings and the existing Substation, even on the Applicant's highest subjective position that it is "*minor-moderate significant adverse*".



Less Intrusive Alternative Landscaping

51. Adequate visual landscaping of the Converter Station S can be secured by:
 - Additional shrub planting near to the Converter Station (north of the black dotted line on the Features Plan) and positioned on any re-profiling to ensure maximum visual mitigation as soon as possible is achieved;
 - Gapping up and enhancing the existing hedgerow with native trees along the existing track shown (see photo #9); and
 - Planting along the field boundary at #16.
52. This enables our Clients' to retain their fields in the southerly half of Plot 1-32 which can be maintained in a manner to reflect the open rolling arable landscape and permanently so following construction of the Converter Station and burying of electricity cables.
53. A (northerly) attenuation pond could be re-shaped, fed from channels on the southern side of the Converter Station footprint and related bunding, and situated in a more north-westerly location and shaped to fit in order to avoid the compulsory acquisition of our Clients' land solely for landscape and Converter Station maintenance over the operational phase of the Application Development. See the proposed diagram.