



AQUIND Limited

AQUIND INTERCONNECTOR

Request for Changes to the Order Limits

The Planning Act 2008

Document Ref: 7.7.17

PINS Ref.: EN020022

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DOCUMENT: 7.7.17

DATE: DECEMBER 2020

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DOCUMENT

Document	7.7.17 Request for Changes to the Order Limits
Revision	001
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Date	December 2020
Approved By	M. Jarvis / M. Wood
Date	December 2020

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1. INTRODUCTION

1.1. OVERVIEW

- 1.1.1.1. On 14 November 2019, AQUIND Limited (the ‘Applicant’) made an application for an Order granting Development Consent for the UK elements of AQUIND Interconnector (the ‘Application’). On 3 November 2020, the Applicant submitted material proposing a reduction to the land within the Order limits at a number of locations, and a small extension of the Order limits at one location. On 11 November 2020 the Examining Authority (‘ExA’) issued a procedural decision accepting this change into the Examination.
- 1.1.1.2. The Applicant is now proposing further and final changes to the Order limits (‘Proposed Changes’) in response to stakeholder feedback and further technical and survey work.
- 1.1.1.3. Advice Note 16¹ states that: “Applicants will need to decide for themselves (taking their own legal advice) whether a proposed change to an application is material and therefore whether to request for the ExA to consider accepting a request to materially change the application.”
- 1.1.1.4. In the view of the Applicant and their legal team, taking account of the criteria in Advice Note 16, the Proposed Changes are not material despite that fact that they involve the inclusion of two additional plots of land². However, we recognise that the ExA wishes to be able to:
- (i) satisfy itself as to the materiality of the Proposed Changes, and to be provided with sufficient information to do so;
 - (ii) satisfy itself as to whether there is a need for consultation on the Proposed Changes; and
 - (iii) make a formal decision whether to accept the Proposed Changes into the Examination (regardless of whether they are material or non-material).
- 1.1.1.5. This document is provided as part of the Applicant’s request for the Proposed Changes (‘Change Request’), in order to assist the ExA in making judgements and procedural decisions in relation to the above.

¹ Advice Note 16: How to request a change which may be material (Planning Inspectorate, March 2018)

² We note that in their letter of 11 November 2020, the ExA considered in respect of our application for changes to the Order limits that the addition to a plot or a new plot of land rendered the application one for a ‘material’ change, notwithstanding the immateriality of its effects.

1.2. REASONS FOR THE CHANGES

1.2.1.1. Chapter 2 of this document describes the Proposed Changes to the Order limits, and the reasons for those changes. For ease of reference, the changes are referred to by numbered references set out in that Chapter.

1.2.2. EXPANSION OF THE ORDER LIMITS

1.2.2.1. Both expansions to the Order limits are proposed in order to address the impact of ash-dieback and the consequential effect on the landscape and visual impacts of the converter station. The disease has spread more rapidly than expected when the Landscape and Visual Impact Assessment (LVIA) (Chapter 15 of the ES (APP-130)) was undertaken between 2017 and 2019.

1.2.2.2. In response to concerns from the South Downs National Park Authority, the Applicant has recently surveyed the woodlands on which the future baseline relies for visual screening and has identified a number of mitigation measures which may be put in place to address the loss of trees as a consequence of ash dieback so that the future baseline does not change. A summary of the findings of that survey report (Ash Dieback Survey Findings) is submitted as part of the current Change Request (Appendix 3) to provide further background on this issue and the need for and benefit of the changes.

1.2.2.3. In addition to the adoption of active woodland management practices and additional planting within the current Order limits, the Ash Dieback Survey Findings recommend the Applicant actively manages two woodlands not currently within the Order limits:

- **Proposed Change 1:** Mill Copse – 10,122 square metres of woodland shown as ‘Woodland A’ in the Ash Dieback Report, and assigned plot number 1-32a in the Updated Land Plans and Addendum to the Book of Reference; and
- **Proposed Change 2:** Stoneacre Copse (ancient woodland) – 14,842 square metres of woodland shown as ‘Woodland F’ in the Ash Dieback Report, and assigned plot number 1-02a in the Updated Land Plans and Supplement to the Book of Reference.

1.2.2.4. The Applicant has been engaging with the respective land owners (or their agents in respect of Stoneacre Copse) with a view to seeking the necessary rights to plant and manage these two blocks of woodland. However, in order to ensure that these rights are secured and do not pose an impediment to delivery of the proposed development, the Applicant wishes to acquire the ‘New Landscaping Rights’ (as defined in the Book of Reference) over these plots through the Order powers. Engagement with the land owners will continue with a view to securing acquisition of the necessary rights by agreement if possible.

1.2.3. REDUCTION OF THE ORDER LIMITS

1.2.3.1. There are two areas of land within the Order limits which the Applicant would like now to remove. These are:

- **Proposed Change 3:** Removal of the western extent of plots 1-60 and 1-71 (to the west of plots 1-57). The Applicant highlighted its intention to remove this area in its Transcript for Compulsory Acquisition Hearing 1; and
- **Proposed Change 4:** Removal of plots 1-50, 1-66, 1-67, 1-68, 1-74, 1-76, 1-77, 1-80 and the majority of plots 1-63 and 1-75 in the area known as Broadway Farm Cottages at Lovedean.

1.2.3.2. Change 3 is proposed as further assessment has determined that it will not be necessary to seek rights to support (i) temporary access and (ii) temporary realignment of the public right of way (footpaths 16 and 4) over as much land as previously identified in the Order limits in this area. The Applicant understands this removal will be welcomed by the landowners (Messrs. Geoffrey and Peter Carpenter in relation to plot 1-71 and Winchester College and their tenants, Timothy and Samuel Sykes, in relation to plot 1-60).

1.2.3.3. Change 4 responds to an increased level of certainty in relation to the location from where the undergrounding of the 11kv overhead line would take place, which reduces the area over which rights are required. The Applicant understands that this removal will be welcomed by the land owners in this area also.

1.3. COMPULSORY ACQUISITION

1.3.1.1. Two of the Proposed Changes (Proposed Changes 1 and 2) will necessitate the inclusion of powers for the compulsory acquisition of New Landscaping Rights (as defined in the Book of Reference) over “additional land” as defined in The Infrastructure Planning (Compulsory Acquisition) Regulations 2010.

1.3.1.2. The Applicant encloses with this report, information required by Section 123(4) of the Planning Act 2008 and Regulation 5 of the Infrastructure Planning (Compulsory Acquisition) Regulations 2010. This includes:

- A Supplemental Book of Reference
- An Order limits Amendment Plan showing new plots 1-02a and 1-32a
- A statement of reasons as to why rights over the Additional Land are required to be acquired in connection the Proposed Development; and
- A statement to indicate how the Proposed Development for which the DCO is applied in relation to is proposed to be funded.

- 1.3.1.3. We confirm that we will await the ExA's decision in relation to the acceptance of the Proposed Changes into the Examination and will then carry out Regulation 7 and 8 notification and publicity in accordance with the ExA's instructions and guidance.

1.4. ENVIRONMENTAL STATEMENT

- 1.4.1.1. A full review of the Environmental Statement (ES) submitted with the Application has been carried out to assess whether the Proposed Changes (considered based on a revised baseline of increased ash dieback as identified in the Ash Dieback Survey Findings) would result in new or different likely significant effects or affect the conclusions of any chapters in the ES. This assessment is presented in Chapter 4 of this document and Appendix 2. Its implications for the materiality of the Proposed Changes are set out in Chapter 5.

- 1.4.1.2. The assessment of landscape and visual impacts of the project proposals including the Proposed Changes, compared with the original assessment in the ES, is set out in Appendix 2. That Appendix reviews only the receptors which are sufficiently proximate to the converter station site to be potentially impacted by ash dieback in landscape or visual terms and where the woodlands most affected by ash dieback serve a visual screening function for the converter station. Ash dieback will not impact on any other receptors further afield due to the 'layering' effect of woodland features at a greater distance.

1.5. MATERIALITY AND CONSULTATION

- 1.5.1.1. The basis on which the Applicant considers the impact of the Proposed Changes to be non-material is set out in Chapter 5 of this document. Chapter 6 explains why the Applicant does not consider that consultation is required in order to satisfy the requirements of procedural fairness in this case.

2. DESCRIPTION OF THE PROPOSED CHANGES TO THE ORDER LIMITS

2.1. OVERVIEW

- 2.1.1.1. There are four proposed changes to the Order limits as provided for in the original Application submitted in November 2019 as amended by the ExA's procedural decision of 11 November 2020.
- 2.1.1.2. Those Proposed Changes to the Order limits are summarised in the Table 2.1 below.
- 2.1.1.3. The first column of Table 2.1 provides extracts comparing the Order limits as proposed by this Change Request (shown by a red line) against the Order limits as originally applied for and varied by the previous change request (shown by a blue dotted line). Where these are the same (i.e. where there is no change proposed), a dotted blue line is shown over the red line. A full plan of the converter station site showing a comparison of the current Order limits with those now proposed is included at Appendix 1 to this document.
- 2.1.1.4. Areas removed from the Order limits (**Proposed Changes 3 and 4**) are shown shaded in pink, and the two new plots of land over which New Landscaping Rights are sought (**Proposed Changes 1 and 2**) are shown shaded in green.
- 2.1.1.5. The changes are shown in the direction of north to south of the Order limits.
- 2.1.1.6. The New Landscaping Rights sought are as described in the Book of Reference and sought already in relation to a number of other plots within the Order limits, namely:

New Landscaping Rights (Land Coloured Green)

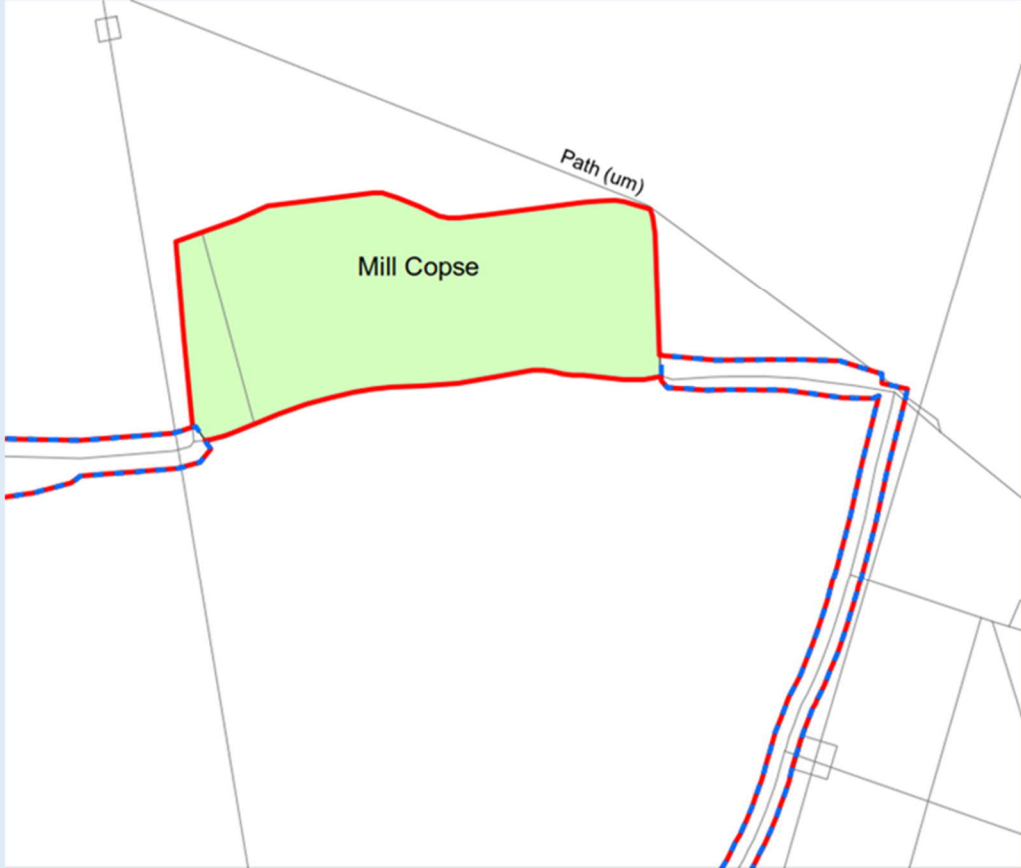
Means all rights and restrictions necessary for the undertaker and / or those authorised by the undertaker:

- (a) To install, execute, implement, retain, repair, improve, renew, remove, relocate and plant trees, woodlands, shrubs, hedgerows, seeding and other ecological measures together with the right to maintain, inspect and replant such trees, shrubs and landscaping and the right to pass and repass on foot, with or without vehicles, equipment, plant and machinery (including any temporary surface) at all times and for all purposes in connection with the implementation and maintenance of landscaping and ecological mitigation or enhancement works;

New Landscaping Rights (Land Coloured Green)

- (b)** To install, construct, operate, test, retain, use, maintain, inspect, alter, remove, refurbish, reconstruct, replace, renew, upgrade, protect and improve sewers, drains, pipes, ducts, mains, conduits, flues and to drain into and manage water flows in any drains, watercourses and culverts; and
- (c)** Restrictions on constructing and erecting buildings, works, structures, excavation, altering ground cover or soil levels, or growing or planting trees or shrubs or carrying out operations or actions which may obstruct, interrupt, or interfere with the exercise of the rights.

Table 2.1 - Explanation of the Proposed Changes to the Order limits

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change	Description of Proposed Change (in bold) and reason for the Proposed Change
	<p>PROPOSED CHANGE 1</p> <p>Addition of Mill Copse to the Order limits (new plot 1-02a), over which New Landscaping Rights are sought</p> <p>Mill Copse is proposed to be included within the Order limits to enable the Applicant to obtain the right to plant and manage trees in order to mitigate the impact of ash dieback disease on the visual screening of the converter station in future. This is an issue which has been raised by the South Downs National Park Authority, and which led the Applicant's consultants to undertake a further survey of the woodland in proximity to the proposed converter station site. The results of that survey indicated that ash dieback was affecting the ash in Mill Copse more significantly than had been anticipated. Active management is therefore now considered necessary in order to maintain the visual screening which Mill Copse will provide in the long-term.</p> <p>Mill Copse woodland comprises approximately 75% ash.</p> <p>The woodland provides screening from Monarch's Way, which wraps around its northern edge.</p> <p>There is a need to ensure sufficient vegetation at eye level (including understorey planting) to screen views across to the proposed converter station from Monarch's Way. The woodland also serves a secondary function in contributing to a 'layering of woodland', partially screening views from more elevated positions.</p> <p>Ash dieback threatens the effectiveness of this woodland to provide visual screening.</p> <p>The Applicant is attempting to secure the rights required via voluntary agreement but cannot confirm this will be possible. By including this woodland within the Order limits, the Applicant can secure the necessary rights to plant and manage it such that it continues to act as a visual screen despite the effects of ash dieback.</p>

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change

Description of Proposed Change (in bold) and reason for the Proposed Change



PROPOSED CHANGE 2

Addition of Stoneacre Copse ancient woodland to the Order limits (new plot 1-32a), over which New Landscaping Rights are sought.

Stoneacre Copse is proposed to be included within the Order limits to enable the Applicant to obtain the right to plant and manage trees in order to mitigate the impact of ash dieback disease on the visual screening of the converter station in future. This is an issue which has been raised by the South Downs National Park Authority, and which led the Applicant's consultants to undertake a further survey of the woodland in proximity to the proposed converter station site. The results of that survey indicated that ash dieback was affecting the ash in this woodland more significantly than had been anticipated. Active management of the ancient woodland is therefore now considered necessary in order to maintain the visual screening which Stoneacre Copse will provide in the long-term.

Ash is present throughout Stoneacre Copse. The southern half of the woodland consists of approximately 80% ash, with oak taking dominance in the northern end up to the access track where the population of ash is approximately 40%.

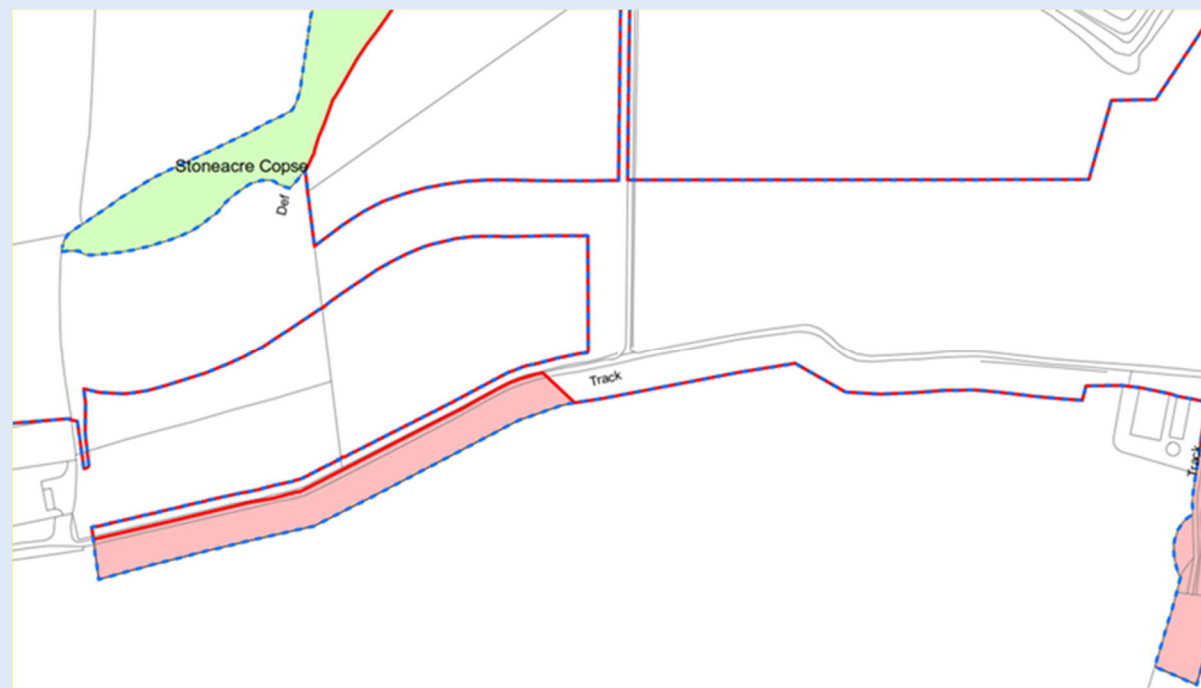
This woodland provides visual screening from residential properties off Broadway Lane and Broadway Lane (south) as well as recreational receptors to the east, south east and south. The woodland also serves a secondary function in providing a 'layering of woodland', partially screening views from more elevated positions and screening the existing Lovedean substation.

Ash dieback threatens the effectiveness of this woodland to provide visual screening.

The Applicant is attempting to secure the rights required via voluntary agreement but cannot confirm this will be possible. By including this woodland within the Order limits, the Applicant can secure the necessary rights to plant and manage it such that it continues to act as a visual screen despite the effects of ash dieback.

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change

Description of Proposed Change (in bold) and reason for the Proposed Change



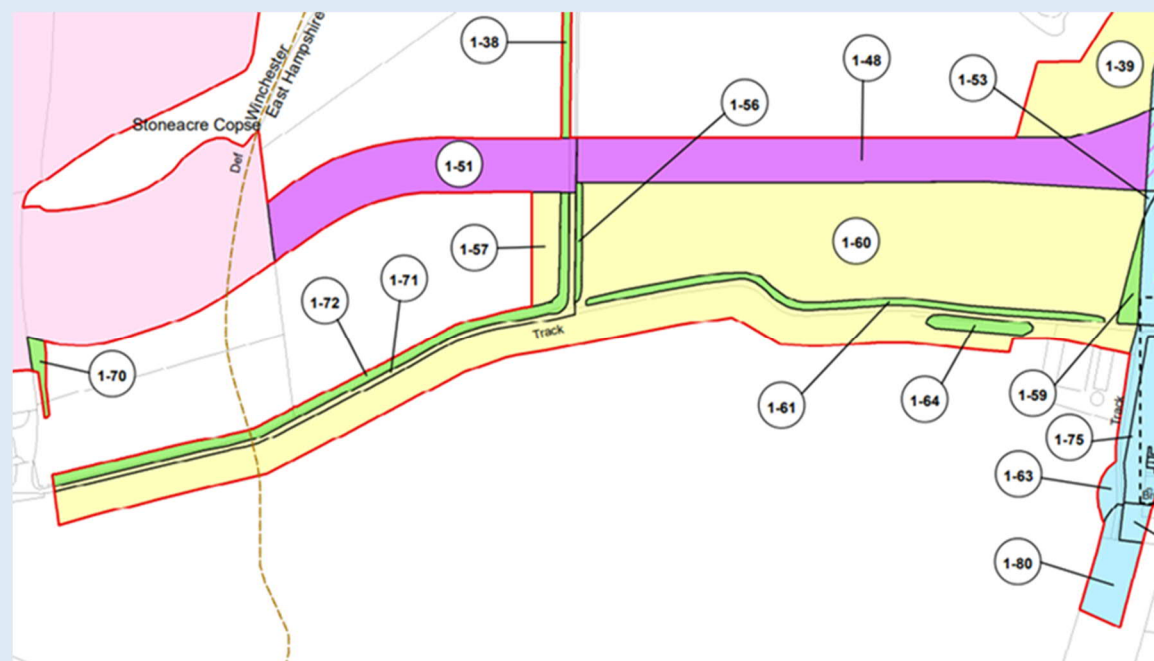
PROPOSED CHANGE 3

Removal of plots 1-60 (in part) and 1-71 (in part)

The permanent access road to the converter station site will provide the access required during the operational phases and also during the majority of the construction phase (i.e. once the road has been constructed).

To facilitate access for plant and machinery while the access road is being constructed, temporary use is required over the existing farm track in the southern parts of plot 1-60, as well as across the farm track identified as plot 1-71. The southern parts of plot 1-60 were intended to facilitate the temporary diversion of the public right of way (part of footpaths 16 and 4 which run through plot 1-71) over the farm track which sits within plot 1-60 should that be required.

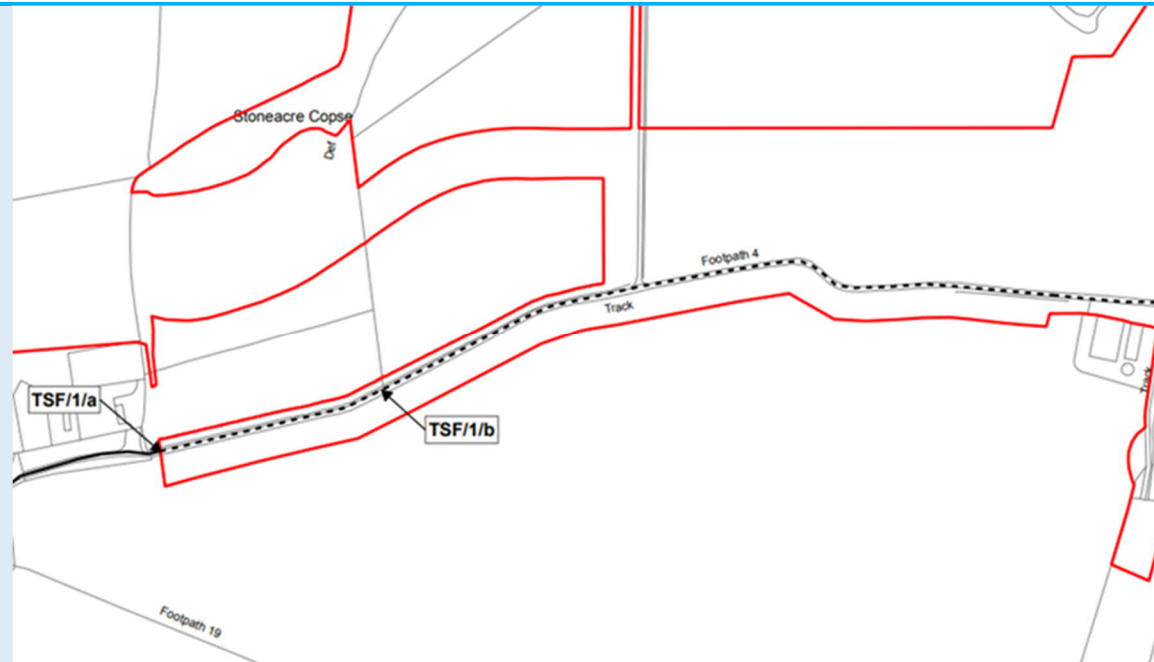
Further assessment has, however, concluded that in the event it is necessary to divert the public right of way, this would not need to take place in the areas proposed to be removed from the Order limits, and the Applicant has no other need to temporarily use this area. As such it can be removed from the Order limits.



Extract from the Land Plans prior to this Change Request (APP-008 Rev03)

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change

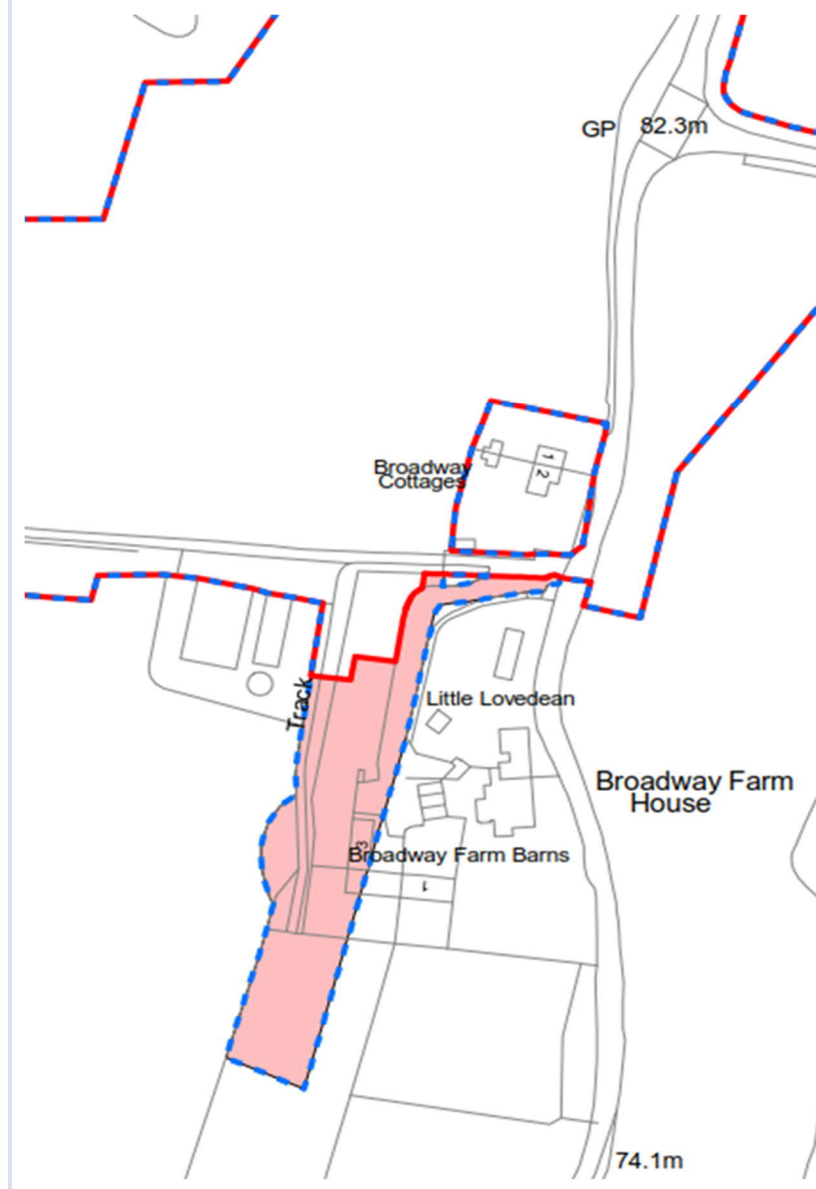
Description of Proposed Change (in bold) and reason for the Proposed Change



Extract from the Access and Rights of Way Plans prior to this Change Request (APP-011 Rev02)

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change

Description of Proposed Change (in bold) and reason for the Proposed Change



PROPOSED CHANGE 4

Reduction of Order limits affecting: plots 1-66, 1-67, 1-68, 1-74, 1-76, 1-77, 1-80 (all removed in their entirety); and removal of plot 1-50 (in part), 1-63 (in part) and 1-75 (in part).

One of the enabling activities which will be required to facilitate the construction of the new access road in plots 1-52, 1-47, 1-48, 1-51 and 1-32 is the undergrounding of the existing 11kv overhead line ('OHL') which runs north to south through plots 1-33, 1-36, 1-47, 1-55, 1-63, 1-74, 1-75, 1-76, 1-77 and 1-80. The OHL is owned and operated by SSE Services Plc as Local Distribution Network Operator ('SSE').

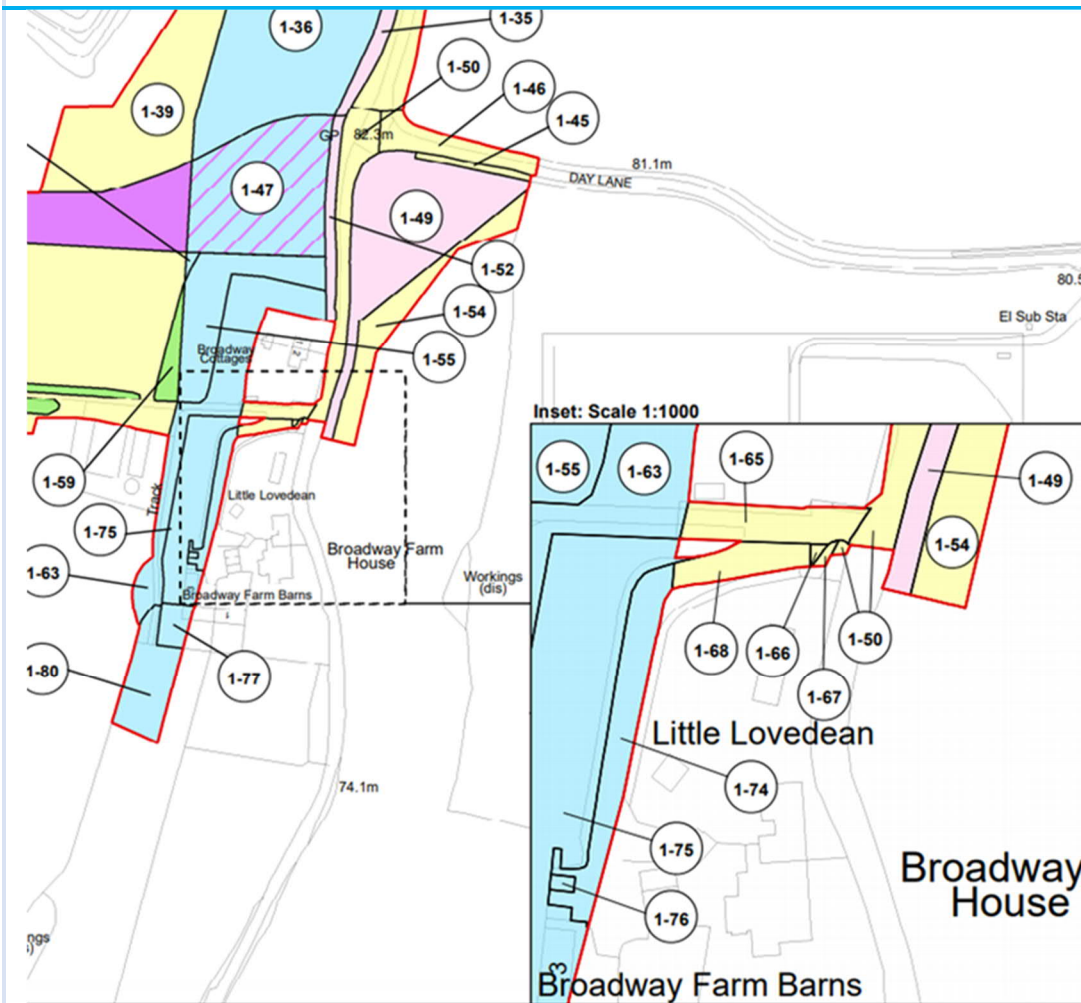
The Order limit in this area was based on undergrounding works taking place from a pole located in plot 1-80, which would have required access over the plots located north of this in association with the undergrounding works.

Following further assessment, the Applicant is confident the undergrounding would not take place from the pole located in plot 1-80 but would instead take place from a pole located on the northern boundary of plot 1-55, adjacent to the existing farm track which runs through plot 1-63. An area south of this pole, has been retained as it is likely SSE would need access over it in association with undertaking the works.

As a result the Applicant will not need to secure New Connection Works Rights over plots 1-74, 1-76, 1-77 and 1-80, and the area over which rights are sought at plots 1-63 and 1-75 can be substantially reduced. Furthermore temporary use of plots 1-66, 1-67 and 1-68, which were identified to provide temporary access associated with undertaking the works are not required and only part of plot 1-50 is now required for such temporary use.

Extract from Order limits (and Land Plans in respect of Proposed Changes 3 and 4) showing extent of change

Description of Proposed Change (in bold) and reason for the Proposed Change



Extract from Land Plans prior to this Change Request (APP-008 Rev03)

3. SCHEDULE OF REVISED APPLICATION DOCUMENTS

3.1. INTRODUCTION

3.1.1.1. In the event that this Change Request is accepted by the ExA, the Applicant intends to submit to the Examination updated versions of the plans below, which will reflect the Proposed Changes described in Chapter 2 of this document.

Table 3.1 - Documents Revised to Reflect the Proposed Changes

Doc No.	Document Title	Changes Made Since Previous Version
2.1	Site Location Plan – Sheet 1 and 2	Incorporating Proposed Changes to the Order limits.
2.2	Land Plan – Sheet 0 and Sheet 1	Incorporating Proposed Changes to the Order limits.
2.3	Crown land Plans – Sheet 0, Sheet 1 and Sheet 11	Incorporating Proposed Changes to the Order limits, and consequential removal of Crown Land plots 1-66 and 1-67.
2.4	Works Plans – Sheet 0 and Sheet 1	Incorporating Proposed Changes to the Order limits.
2.5	Access and Rights of Way Plan – Sheet 0 and Sheet 1	Incorporating Proposed Changes to the Order limits, and consequential removal of right to stop up part of footpaths 4 and 16 within the area of land removed from the Order limits.
2.12	Hedgerow and Tree Preservation Orders Plans – Sheet 0 and Sheet 1	Incorporating Proposed Changes to the Order limits

3.1.1.2. At Deadline 6, the Applicant will submit the following documents, to reflect the additional commitments to be made to address ash dieback. These commitments have been assumed and taken into account in our assessment of the impact of ash dieback and the Proposed Changes in Appendix 2:

Document	Update to be Provided
<p>Updated Outline Landscape and Biodiversity Strategy (OLBS);</p>	<p>The OLBS will be updated as follows:</p> <ul style="list-style-type: none"> • Section 1.3 (Existing features and condition): Reference will be included to the findings of the ash dieback survey. • Section 1.4 (Effects of the Proposed development): Reference will be made to the consequences of ash dieback on the LVIA. • Section 1.7 (Site specific management prescription): This section will be updated to include reference to specific management principles in relation to the new areas of woodland to be included within the Order limits namely Stoneacre Copse and Mill Copse. Mention will be made of approximate timescales for works to occur and the actions which will take place alongside annual monitoring plans to review yearly actions. This will be refined further through the detailed landscaping scheme referred to in Requirement 7. <p>The document whilst also referring to replacement planting will have additional detail added throughout by making reference to the monitoring of existing trees to determine whether further action needs to be taken - again further information will be included through the detailed landscaping scheme.</p> <p>The indicative landscape management plans for both Option (i) and Option B(ii) will be updated to reflect the inclusion of both Stoneacre Copse and Mill Copses within the Order limits plus an additional area of native mixed woodland belt to the south of the Mill Copse, referred to as Woodland B in the Ash Dieback Survey Findings.</p>
<p>Updated indicative landscape mitigation plans for Option B(i)</p>	<p>The plans will be updated to reflect the inclusion of both Stoneacre Copse and Mill Copses within the Order limits plus an additional area of native mixed woodland belt to the south of the Mill Copse.</p>

Document	Update to be Provided
<p>Updated indicative landscape mitigation plans for Option B(ii)</p>	<p>The plans will be updated to reflect the addition of both Stoneacre Copse and Mill Copse to the Order limits plus an additional area of native mixed woodland belt to the south of the Mill Copse.</p>
<p>Appendix 15.7 Landscape Schedules, Planting Heights and Image Board (APP-405)</p>	<p>This document will be updated to remove reference to the specific sizes, age of proposed species to be planted in Table 1 to 12 where appropriate.</p> <p>This allows flexibility to introduce a greater variety of plant sizes to address visual screening and also in response to ash dieback. This will provide greater flexibility as referred to in the OLBS over planting which would be agreed with the relevant discharging authority in consultation with the South Downs National Park Authority.</p>
<p>Onshore Outline CEMP</p>	<p>This document will be updated to include the fencing of a 15m buffer around ancient woodland to exclude construction workers other than workers delivering the site specific management activities outlined in the updated OLBS.</p>

4. IMPACT OF THE CHANGES ON THE ENVIRONMENTAL STATEMENT

4.1. INTRODUCTION

- 4.1.1.1. This chapter reviews the implications of the Proposed Changes to the Order limits on the environmental assessments undertaken to date in the ES submitted with the Application as supplemented through the course of the Examination to date.
- 4.1.1.2. Effects of the Order limits changes on the ES are detailed in Table 4.1 below and Appendix 2.

Table 4.1 - Review of the Changes to the Order limits and Implications for the ES Assessments

ES Chapter	Review of Assessment based on Order Limit Changes
<p>15 - Landscape and Visual Amenity</p>	<p>The following documents have been reviewed in the context of the Order:</p> <ul style="list-style-type: none"> • Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130); • Appendix 15.8 Assessment of Landscape and Visual Effects (APP-406); • Updated Outline Landscape and Biodiversity Strategy (OLBS) (REP1-034 and 035); • Indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) Option B(i); and • Indicative landscape mitigation plans for Option B(ii) (REP5-032). <p>The assessment set out in this Table also takes into account the principles of ash dieback management which will be committed to in updated versions of the documents to be submitted at Deadline 6 as set out in Chapter 3.</p> <p>A review of the Proposed Changes to the Order limits in relation to Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) has been undertaken and is set out below and (in relation to Proposed Changes 1 and 2) in Appendix 2.</p> <p>Proposed Changes 1 and 2</p> <p>The future baseline will change as a consequence of the identified ash dieback. The two woodland blocks included in the extended Order limits are areas that help screen the converter station. Losses to woodland as a result of ash dieback would erode the future baseline considered in the ES as the disease will cause the deterioration and loss of trees that provide a screening function. The proposed extension of the Order limits to include these woodlands would allow:</p> <ul style="list-style-type: none"> • Areas of additional screening planting (suitable non-ash native species) to be planted; and • Management of the decline of ash trees and replacement planting within the woodland blocks. <p>In the longer term there will be no changes to the conclusions of the ES Chapter 15 (APP-130) where these woodland blocks are actively managed as proposed by the Applicant, and with supplementary screening to both the southern edge of Mill Copse (which will be presented on revised indicative landscape mitigation plans prepared for Deadline 6) and around the western and southern edges of Stoneacre Copse. The inclusion of both areas of woodland will be positive in terms of landscape character improving the overall condition and value of these features.</p> <p>The approach would be to remove trees that risk causing a safety hazard or where the removal would slow the progression of the ash dieback disease.</p> <p>In the short term the effectiveness of screening would be reduced as a consequence of ash dieback progression and the resultant loss of leaves from the diseased trees. This will continue until such time as the new planting becomes established. However, as set out in Appendix 2, there will be no increase in the level of significance as set out in the ES for relevant recreational and residential receptors, save for an increase in the significance of the effect experienced by recreational users of the public right of way to the south of the site (footpath DC19 / HC28) at year 10 (which would change from Minor to moderate (not significant) to Moderate (significant)).</p> <p>Proposed Changes 3 and 4</p> <p>The removal of land associated with the converter station construction access and the undergrounding of the 11kv line near Broadway Farm do not change the conclusions of ES Chapter 15 (APP-130). The existing vegetation within these removed areas was already to be retained.</p>

ES Chapter	Review of Assessment based on Order Limit Changes
	<p>Conclusion</p> <p>In summary, the increased rate of ash dieback confirmed by the Ash Dieback Survey Findings means that the visual effect as assessed in the ES would change from non-significant to significant, in respect of recreational users of footpath DC19 / HC28 to the south of the converter station site. The adverse visual effect here at year 10 only would change from Minor to moderate (not significant) to Moderate (significant).</p> <p>In summary, provided Proposed Changes 1 and 2 are allowed by the ExA, the increased rate of ash dieback confirmed by the Ash Dieback Survey Findings would lead to one change in the visual effect as assessed in the ES: would change from non-significant to significant, in respect of recreational users of footpath DC19 / HC28 to the south of the converter station site. The adverse visual effect here at year 10 only would change from Minor to moderate (not significant) to Moderate (significant). Elsewhere, again provided that Proposed Changes 1 and 2 are accepted by the ExA and those woods are managed in accordance with the OBLs, there would be only small differences in the magnitude of change from that predicted in the ES, none of which would lead to a change in significance of effect from that set out in the ES.</p>
<p>16 – Onshore Ecology (with Arboriculture)</p>	<p>Ecology</p> <p>Proposed Changes 1 and 2</p> <p>The additional area of woodland in the Order limits does not change the assessment outlined in Chapter 16 of the ES (APP-131). The habitats brought into the Order limits will not be adversely affected by the proposed woodland management measures. The opportunity to manage these areas for biodiversity as part of the management plan for ash dieback will benefit and enhance biodiversity.</p> <p>Protected species including nesting birds and roosting bats will be considered during plans for management of these woodland areas to ensure compliance with wildlife legislation. These works would not start until the relevant written biodiversity management plan is agreed with the local planning authority.</p> <p>The OLBS will be updated (for Deadline 6) to reflect the proposed woodland management measures extended to Mill Copse and Stoneacre Copse. An addition to the Onshore Outline CEMP will include that the contractor must fence off the ancient woodland and a 15m buffer during the construction works, to ensure no construction works occur within 15m.</p> <p>Proposed Changes 3 and 4</p> <p>The reduction in Order limits removes small areas of arable land, amenity grassland and woodland as identified on the ES - Volume 3 – Appendix 16.2 PEA/Phase 1 Habitat Survey Report (APP-410), Figure 16.3. These areas are small and do not change the conclusions of the ES.</p> <p>Arboriculture</p> <p>Proposed Changes 1 and 2</p> <p>The increase in the Order limits to include additional areas of woodland at Mill Copse and Stoneacre Copse does not change the assessment of trees in the Arboricultural Report. Any removal of trees would be as a result of ash dieback and not as a result of the proposed development.</p> <p>Though the inclusion of these tree is for a visual screening function, implementing the OLBS focused on the retention of the woodland post ash dieback will be beneficial to the long-term retention of the woodland.</p> <p>Proposed Changes 3 and 4</p> <p>There are two areas proposed to be removed from the Order limits. The trees and hedgerows within these areas are already to be retained so no additional trees and hedgerows are removed and there is no change to the assessment of trees in the Arboricultural Report.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on onshore ecology as assessed in the ES.</p>

ES Chapter	Review of Assessment based on Order Limit Changes
17 – Soils and Agricultural Land Use	<p>A review of the changes to the Order limits in relation to Chapter 17 (Soils and Agricultural Land Use) of the ES (APP-132) has been undertaken. The additional areas of land added to the Order limits are not agricultural and therefore do not affect the assessment.</p> <p>The reduction of the Order limits reduces the land take of Grade 3a and 3b Agricultural land by 4,230m² This slightly reduces the adverse impact assessed in Chapter 17 but does not change the overall assessment conclusions or mitigation.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on soils and agricultural land use as assessed in the ES.</p>
18 - Ground Conditions	<p>A review of the changes to the Order limits in relation to Chapter 18 (Ground Conditions) of the ES (APP-133) has been undertaken.</p> <p>Proposed Changes 1 and 2</p> <p>The increase of the Order limits to incorporate two areas of woodland will only include new areas subject to woodland management activities. No other construction activity will be undertaken in these areas. The woodland management activity within these additional areas does not give rise to new impacts in relation to ground conditions.</p> <p>Proposed Changes 3 and 4</p> <p>The reduction in the Order limits does not affect the assessment undertaken (Chapter 18 of the ES (APP-133), Section 18.7), as this assessed potential contamination within the Order limits and also within 500m of the Order limits (Section 18.1.2), therefore reducing the Order limits does not change the assessment. Conclusions will remain the same as stated in Section 18.7 (Predicted Impacts) and 18.10 (Residual Effects).</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on ground conditions as assessed in the ES.</p>
19 - Groundwater	<p>A review of the changes to the Order limits in relation to Chapter 19 (Groundwater) of the ES (APP-134) has been undertaken.</p> <p>Proposed Changes 1 and 2</p> <p>The increase of the Order limits to incorporate two areas of woodland will only include new areas that will be subject to woodland management activities. No other construction activity will be undertaken in these areas. The woodland management activity within these additional areas does not give rise to new impacts in relation to groundwater.</p> <p>Proposed Changes 3 and 4</p> <p>The reduction in the Order limits does not affect the assessment undertaken in Chapter 19 (Groundwater) of the ES (APP-134).</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on groundwaters as assessed in the ES.</p>
20 - Surface Water Resources and Flood Risk	<p>A review of the changes to the Order limits in relation to Chapter 20 (Surface Water Resources and Flood Risk) of the ES (APP-135) has been undertaken.</p> <p>Proposed Changes 1 and 2</p> <p>The increase of the Order limits to incorporate two areas of woodland will comprise new areas that will be subject to woodland management activities. No construction activity will be undertaken in these areas. The woodland management activity within these additional areas does not give rise to new impacts in relation to surface water.</p> <p>Proposed Changes 3 and 4</p> <p>The reduction in the Order limits does not affect the assessment undertaken in Chapter 20 (Surface Water) of the ES (APP-135).</p>

ES Chapter	Review of Assessment based on Order Limit Changes
	<p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on surface water resources and flood risk as assessed in the ES.</p>
<p>21 - Heritage and Archaeology</p>	<p>A review of the changes to the Order limits in relation to Chapter 21 (Heritage and Archaeology) of the ES (APP-136) has been undertaken and it is concluded that there are no changes to the impact assessment as presented in Chapter 21 of the ES (Heritage and Archaeology), due to the nature and small extent of the areas added/removed and the fact that the new areas will not include construction works.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on heritage and archaeology as assessed in the ES.</p>
<p>22 – Traffic and Transport</p>	<p>Following a review of the changes to the Order limits in relation to Chapter 22 of the ES (Traffic and Transport) (APP-137) and Chapter 15 of the ES Addendum (REP1-139), it is concluded that this not a material change to the traffic and transport assessment.</p> <p>Change 3 removes a 249m length of PRoW 4 and 16 from the Order limits and a Diversion for this length is no longer required. The remaining length of this footpath within the Order limits will still be stopped up temporarily and the diversion already identified will be required.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on traffic and transport as assessed in the ES.</p>
<p>23 – Air Quality</p>	<p>Following a review of the changes to the Order limits in relation to Chapter 23 (Air Quality) of the ES (Rev002) (REP1-033), it is concluded that there are no changes to the outcome of the construction dust risk assessment. The minor reductions in the Order limits have no effect on the construction dust risk assessment. Where the Order limits are expanded to include areas of woodland, the management activity would not be a new source of air quality impacts and measures are already proposed to mitigate the potential impacts of construction dust on surrounding woodland sensitive receptors.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on air quality as assessed in the ES.</p>
<p>24 - Noise and Vibration</p>	<p>The Noise and Vibration assessment has been reviewed to determine any changes to the assessment detailed in Chapter 24 (Noise and Vibration) of the 2019 ES (APP-139) or Section 17 of the ES Addendum (REP1-139). The minor reductions in the Order limits have no effect on the construction noise assessment. Where the Order limits are expanded to include areas of woodland, the management activity would not be a new source of noise impacts.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on noise and vibration as assessed in the ES.</p>
<p>25 – Socio-economics</p>	<p>A review of the changes to the Order limits in relation to Chapter 25 (Socio-economics) of the ES (APP-140) has been undertaken and concludes that there are no changes to the assessment as a result of the changes to the Order limits.</p> <p>Change 3 has removed a 249m length of PRoW 4 and 16 from the Order limits and a diversion for this length is no longer required. The remaining length of this footpath within the Order limits will still be stopped up temporarily and the diversion already identified in the ES Addendum – Appendix 14 Note on PRoW, Long Distance Walking Paths and Cycle Route Diversions (REP1-145), will be required.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on socio-economics as assessed in the ES.</p>
<p>26 – Human Health</p>	<p>A review of the changes to the Order limits in relation to Chapter 26 (Human Health) of the ES (APP-141) has been undertaken and the changes to the Order limits do not change the conclusions of the human health assessment.</p>

ES Chapter	Review of Assessment based on Order Limit Changes
	<p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on human health as assessed in the ES.</p>
<p>27 – Waste and Material Resources</p>	<p>The changes to the Order limits have been reviewed in the context of Chapter 27 (Waste and Material Resources) of the ES (APP-147). The changes to the Order limits do not alter the types and volumes of waste anticipated to be generated or the materials consumed as a result of the Proposed Development.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on waste and material resources as assessed in the ES.</p>
<p>28 – Carbon and Climate Change</p>	<p>Greenhouse Gas Emissions ('GHG')</p> <p>The quantity of materials required has not altered, and therefore the GHG calculations and the conclusions of the GHG assessment do not change.</p> <p>Climate Resilience</p> <p>The climate resilience assessment has undertaken a risk and vulnerability assessment of the key Scheme assets. Changes to the Order limits do not change the outcomes of this assessment.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the significance of the effects on carbon and climate change as assessed in the ES.</p>
<p>29 – Cumulative Effects</p>	<p>Following a review of the Order limit changes it is concluded that these changes have no implication on the list of cumulative developments considered in both Chapter 29 (Cumulative Effects) of the ES (APP-144) or Section 20 of the ES Addendum (REP1-139) or the cumulative effects identified in the assessment.</p> <p>Conclusion</p> <p>In conclusion, therefore, the Proposed Changes would not change the cumulative effects as assessed in the ES.</p>

5. MATERIALITY OF THE PROPOSED CHANGES

5.1. INTRODUCTION

5.1.1.1. The decision on whether the changes are ‘material’ is to be made by the ExA. There is no definition of a ‘material’ change in the Planning Act 2008 or the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011. However, there is guidance provided in the Planning Inspectorate’s Advice Note 16 and guidance produced by the Department of Communities and Local Government (‘DCLG’) regarding the criteria that may indicate whether a change is ‘material’. This guidance and its application to the Proposed Changes is reviewed below.

5.1.1.2. The Applicant and its legal team have reviewed the relevant guidance available and are of the opinion that the Proposed Changes are not material despite the fact that they involve the proposed inclusion of new land within the Order limits, and this has informed the proposed approach to dealing with these changes.

5.2. ADVICE NOTE 16: REQUESTING CHANGES

5.2.1.1. Advice Note 16 provides advice on making changes to a DCO during the pre-examination and examination phases where those changes are considered to be material. Paragraph 2.1 states that whilst there is no legal definition of ‘material’, the appropriate considerations are: *‘whether the change is substantial or whether the development now being proposed is not in substance that which was originally applied for.’*

5.2.1.2. Advice Note 16 makes clear that whether a change is ‘material’ or not is a ‘question of planning judgment’ which may be based on criteria including:

- Whether the change would generate new or different likely significant environment effect(s); and
- Whether (and if so the extent to which) a change request involves an extension to the order land, particularly where this would require additional compulsory acquisition powers e.g. for new plots of land and/or interests.

5.3. GUIDANCE ON CHANGES TO DEVELOPMENT CONSENT ORDERS (DCLG)

The DCLG Guidance was written to provide guidance on the processes available to change DCOs after consent, rather than during the pre-examination period. However, given that the DCLG Guidance provides more detailed advice on when changes may be material, the Applicant has had regard to it. The DCLG Guidance does not attempt to prescribe whether particular types of change would be material or non-material. However, it does suggest that changes are more likely to be treated as material if they (paragraphs 12-16):

- Require an updated Environmental Statement to take account of new, or materially different, likely significant effects on the environment. The guidance suggests that this includes significant effects that are positive.
- Require a Habitats Regulations Assessment.
- Require a new or additional licence for European Protected Species.
- Authorise the compulsory acquisition of any land, or an interest in or rights over land, that was not authorised previously.
- Would have an impact on local people and businesses sufficient to indicate that the change should be considered as material. The guidance states that ‘... examples might include those relating to visual amenity from changes to the size or height of buildings; impacts on the natural or historic environment; and impacts arising from additional traffic.’

5.4. ASSESSMENT OF THE MATERIALITY OF SCHEME CHANGES IN CONTEXT OF GUIDANCE

5.4.1. ARE THE CHANGES SUBSTANTIAL OR DO THEY ALTER THE DEVELOPMENT SUCH THAT IT IS NOT IN SUBSTANCE WHAT WAS ORIGINALLY APPLIED FOR?

5.4.1.1. The Proposed Changes do not alter the substance of the original Application. The proposed expansions of the Order limits (Proposed Changes 1 and 2) are intended to maintain the status quo in terms of woodland coverage, in order to maintain the future baseline in landscape visual terms, rather than to change it.

5.4.1.2. The reduction to the Order limits (Proposed Changes 3 and 4) follows further technical analysis and engagement with stakeholders and is not substantial in scale or effect.

5.4.2. WOULD THE CHANGE GENERATE NEW OR DIFFERENT LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS?

- 5.4.2.1. The Applicant's EIA team do not consider that the Proposed Changes generate any new or different likely significant environmental effects (see Chapter 4 of this document).
- 5.4.2.2. The impact of ash dieback (as identified in the Ash Dieback Survey Findings at Appendix 3) **will** have one effect which is more adverse than identified in the original ES, but only in relation to one receptor. In the short term the effectiveness of screening would be reduced as a consequence of ash dieback progression and the resultant loss of leaves from the diseased trees. This will continue until such time as the new planting becomes established. However, as set out in Appendix 2, there will be no increase in the level of significance as set out in the ES for relevant recreational and residential receptors, save for an increase in the significance of the effect experienced by recreational users of the public right of way to the south of the site (footpath DC19 / HC28) at year 10 (which would change from Minor to moderate (not significant) to Moderate (significant)).
- 5.4.2.3. It is important for the ExA to note, however, that this change in impact is not a result of the Proposed Changes, but rather the result of ash dieback (as now better understood by the Applicant) notwithstanding the beneficial impact of Proposed Changes 1 and 2, which are designed to minimise the impact of this disease in LVIA terms.
- 5.4.2.4. The woodland management arrangements that the Applicant proposes to put in place would achieve beneficial effects for landscape character through the maintenance of existing woodland blocks that would otherwise be likely to degrade. They would also achieve beneficial effects on ecological resources at both woods, of which Stoneacre Copse is ancient woodland. However, neither the landscape character or ecological beneficial effects of management would be significant and would not change the conclusions of the ES.
- 5.4.2.5. Accordingly, the changes to the Order limits and rights sought do not generate new or different likely significant environmental effects, they simply avoid the occurrence of worse landscape and visual effects than those set out in the original ES (due to ash dieback changing the future baseline from that set out in the original ES). It is considered that this supports the position put forward by the Applicant that from a perspective of the assessment of environmental effects, the Proposed Changes are not material.

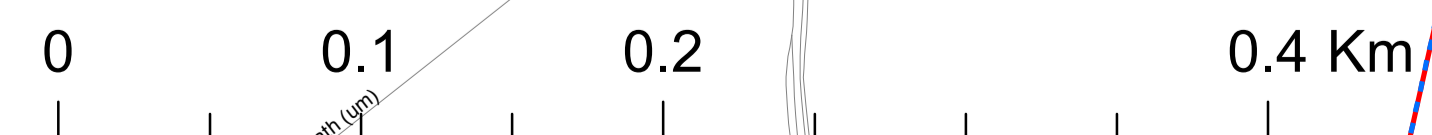
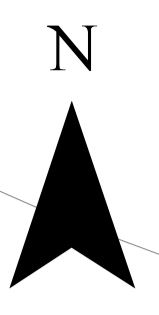
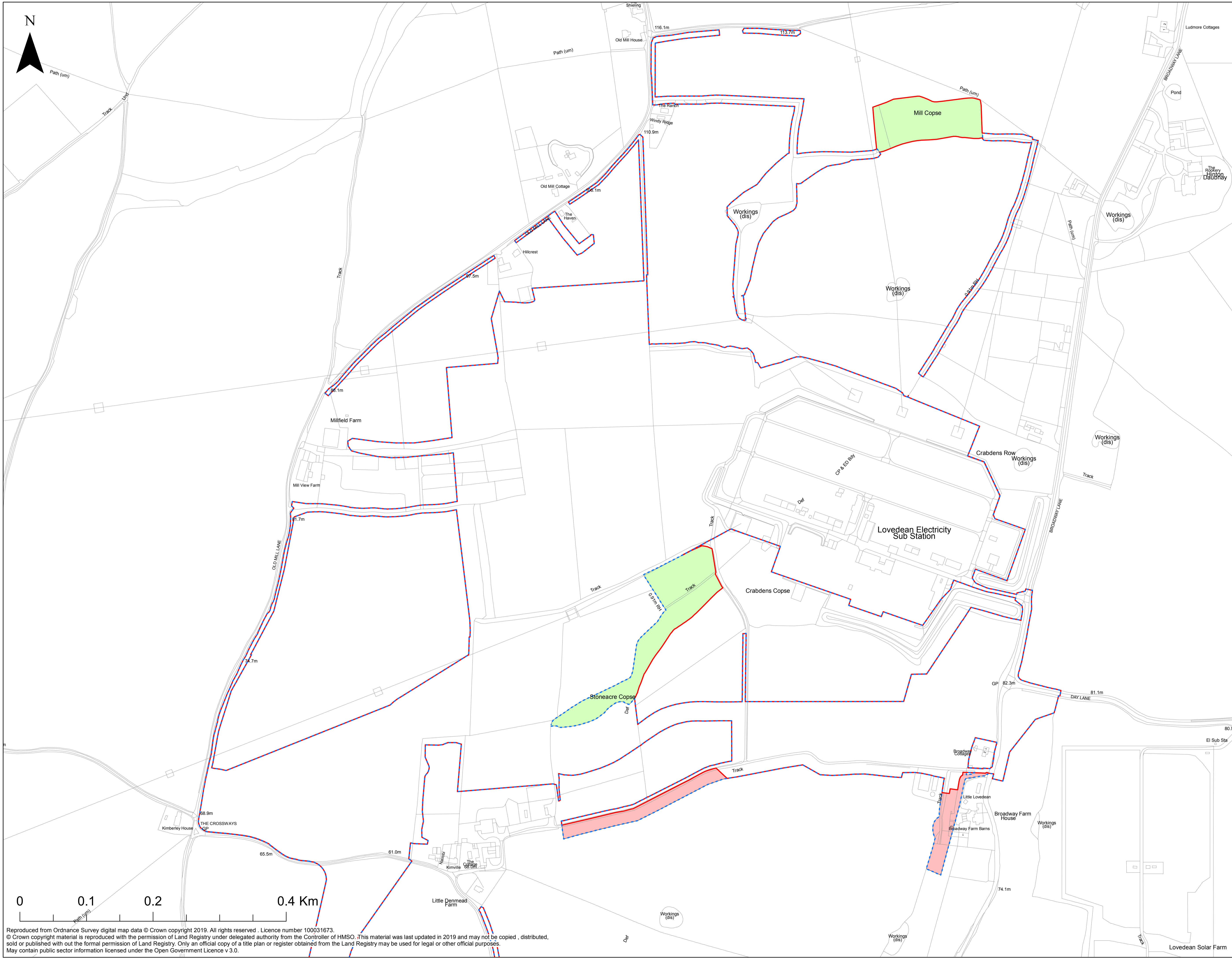
- 5.4.3. WOULD THE CHANGE INVOLVE AN EXTENSION TO THE ORDER LAND AND/OR AUTHORISE THE COMPULSORY ACQUISITION OF ANY LAND, OR AN INTEREST IN OR RIGHTS OVER LAND, THAT WAS NOT AUTHORISED PREVIOUSLY?**
- 5.4.3.1. The Proposed Changes involve the addition of two areas of woodland (10,122 square metres and 14,842 square metres) adjacent to the existing Order limits ('Additional Land'). The Applicant has held discussions with the land owners.
- 5.4.3.2. In the context of the Proposed Development as a whole, and in the context of the specific locations of the Additional Land, it is not considered that the extent of this land is such that the addition is material.
- 5.4.4. IS A HABITATS REGULATIONS ASSESSMENT OR NEW EUROPEAN PROTECTED SPECIES LICENCE REQUIRED?**
- 5.4.4.1. None of the Proposed Changes would require amendments to the Habitats Regulations Assessment or a new Protected Species licence.
- 5.4.5. WOULD IT HAVE AN IMPACT ON LOCAL PEOPLE AND BUSINESSES SUFFICIENT TO INDICATE THAT THE CHANGE SHOULD BE CONSIDERED AS MATERIAL?**
- 5.4.5.1. None of the changes would have a different impact on local people from those previously assessed. The expansion of the Order limits to allow the Applicant the right to replant and manage trees in the two woodlands (Mill Copse and Stoneacre Copse, **Proposed Changes 1 and 2**) will safeguard the existence of these woods in the future, in the face of ash dieback disease which would otherwise endanger their density.
- 5.4.5.2. The reductions in the Order limits (**Proposed Changes 3 and 4**) will result in a reduction in impact on the general public and local land owners.
- 5.5. SUMMARY**
- 5.5.1.1. The Applicant is of the view that the Proposed Changes are not material having regard to Advice Note 16, the Guidance, legal advice, and the conclusions of environmental and technical work. However, it is recognised that the final decision on materiality of the change rests with the ExA, and that given the proposed inclusion of two additional areas of land within the Order limits the ExA may consider the change material, as it did the Applicant's previous request to change the Order limits which the ExA accepted into the Examination with their procedural decision dated 11 November 2020.

6. THE APPLICANT'S POSITION ON CONSULTATION

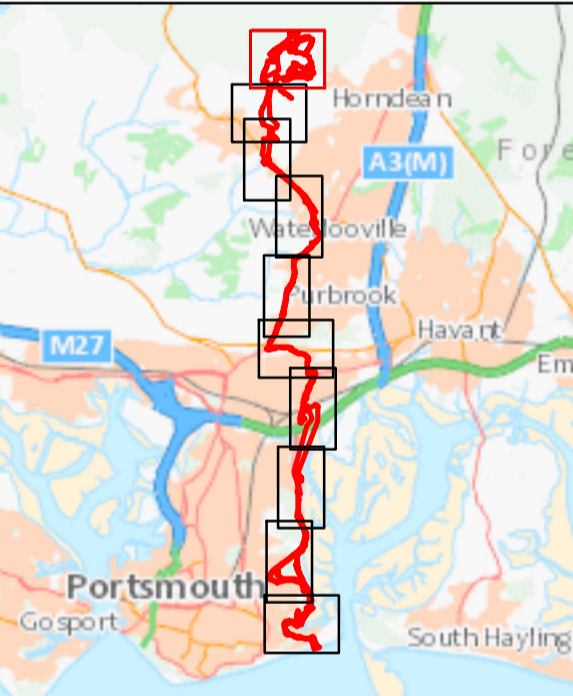
- 6.1.1.1. The Applicant has considered Advice Note 16 in relation to the potential need to consult on the Proposed Changes. Advice Note 16 is clear in recommending consultation where a request is to be made for a 'material' change.
- 6.1.1.2. Based on its own legal advice, the Applicant's view is that the Proposed Changes are not material. The Applicant, however, considered carefully whether it would nevertheless be appropriate to conduct a consultation exercise before submitting the Proposed Changes to the Examination.
- 6.1.1.3. We note that paragraph 2.5 of Advice Note 16 states: "Note that even if a requested change is not considered to be material there may still be a need, in the interests of fairness, to carry out consultation. An applicant will still need to consider (and ultimately the ExA to decide) whether, without re-consultation on the requested change(s), any of those entitled to be consulted or who were consulted on the original application (including persons who are not an Interested Party in the Examination) would be deprived of the opportunity to make any representations on the changed application". A footnote to this statement in the Advice Note suggests reference to the judgement of John Howell QC in the case of R. (on the application of Holborn Studios Ltd) v Hackney LBC in assessing whether consultation is required in the interests of fairness.
- 6.1.1.4. Paragraph 79 of that judgement set out that in considering whether it would be unfair not to re-consult "it is necessary to consider whether not doing so deprives those who were entitled to be consulted on the application of the opportunity to make any representations that, given the nature and extent of the changes proposed, they may have wanted to make on the application as amended".
- 6.1.1.5. The addition of two areas of woodland within the Order limits to enable the Applicant to exercise the New Landscaping Rights to replace and manage trees affected by ash dieback is something which the Applicant is proposing in response to stakeholder feedback (primarily from the South Downs National Park Authority) to address visual screening. It is also relevant, in terms of the interests of other parties in this matter, that the rights are sought simply in order to maintain the status quo in terms of woodland screening rather than to add new infrastructure to the Applicant's proposals.

- 6.1.1.6. The removal of plots of land in two other areas responds to land owner engagement and further technical assessment, and is a matter primarily affecting the Applicant (reducing flexibility) rather than something which could give rise to new opinions from the public or stakeholders which they would not already have had an opportunity to make through the pre-application and section 56 (relevant representation) process.
- 6.1.1.7. Taking the above into account, we consider that all such persons who would have wanted the opportunity to make any representations on the Application have been afforded the opportunity to do so. Therefore, the absence of a further public consultation process would not unfairly deprive any person of the opportunity to make a representation on the Application as amended.
- 6.1.1.8. In the case of the Additional Land the Applicant is already fully engaged with the owners of the land or their agents. Therefore, a further informal consultation exercise would not seem beneficial or necessary from the perspective of the affected land owners.
- 6.1.1.9. It is also noted that the examination process itself allows for representations to be made in relation to the changes which are submitted and can be viewed by all relevant interested parties. Whilst the Proposed Changes are put forward in the mid-point of the Examination, it is still considered there is sufficient opportunity for any representations to be made by those who have already been consulted on the proposals and who may wish to make representations in relation to them, and for any such representations to be heard orally where necessary within the time remaining for the Examination of the Application.
- 6.1.1.10. We are aware that some applicants seeking non-material changes have decided to carry out consultation. However, we trust that this does not mean that there is an expectation by the ExA that this is necessary in all cases. Particularly where changes are identified during the course of an examination which could benefit the project by reducing impacts and land take, it would seem important that the acceptance of those changes into the Examination is expedited where no prejudice would be suffered by interested parties. The carrying out of a separate consultation exercise would unnecessarily delay the process of examining the Proposed Changes within the fixed statutory timescale for the Examination.

**Appendix 1 – Plan
showing a comparison of
the Order limits (as
varied by the changes
accepted by the ExA in
their procedural decision
dated 11 November 2020)
with the Order limits as
now proposed**



- AQUIND Interconnector**
- Order Limits with Proposed Changes
 - Order Limits prior to Proposed Changes
 - Proposed addition to Order Limits
 - Proposed removal from Order Limits



Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 - Regulation 5(2)(i)

REV	DATE	BY	DESCRIPTION	CHK	APP
PO1	09/12/2020	DC	FIRST ISSUE	DL	VB

DRAWING STATUS: DRAFT



PROJECT: AQUIND Interconnector					
TITLE: AQUIND Interconnector Order Limits Amendments Plan					
SCALE AT: 1:2,500	CHECKED: DC	APPROVED: VB			
PROJECT NO: EN020022	DESIGNED: DH	DRAWN: BG	DATE: 09/12/2020		
DRAWING NO: 62100616-20201209-ORDLIMIT-V8.1	REVNO: 01				
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Appendix 2 – Implications for the Landscape and Visual Impact Assessments set out in the ES

The Applicant sets out below the difference in the significance of landscape and visual impacts which would occur as a result of the construction and operation of the converter station from those set out in the ES. This analysis:

- (i) Takes into account the Ash Dieback Survey Findings (**Appendix 3**) carried out by the Applicant on 29 September 2020 in respect of the impact of ash dieback disease on a number of woods proximate to the converter station site; and
- (ii) Assumes that the Applicant is granted the New Landscaping Rights over Mill Copse and Stoneacre Copse, and manages these woods to address ash dieback in accordance with the updates to documents described in Schedule 3 to be submitted at Deadline 6 (which will take into account the recommendations in the Ash Dieback Survey Findings in Appendix 3).

This Appendix reviews only the receptors which are sufficiently proximate to the converter station site to be potentially impacted by ash dieback in landscape or visual terms and where the woodlands most affected by ash dieback serve a visual screening function for the converter station.

Ash dieback in the wider area is considered very unlikely to alter the impact of the proposed development on other receptors further afield due to the 'layering' effect of multiple intervening woodland features in filtering and screening views from a greater distance.

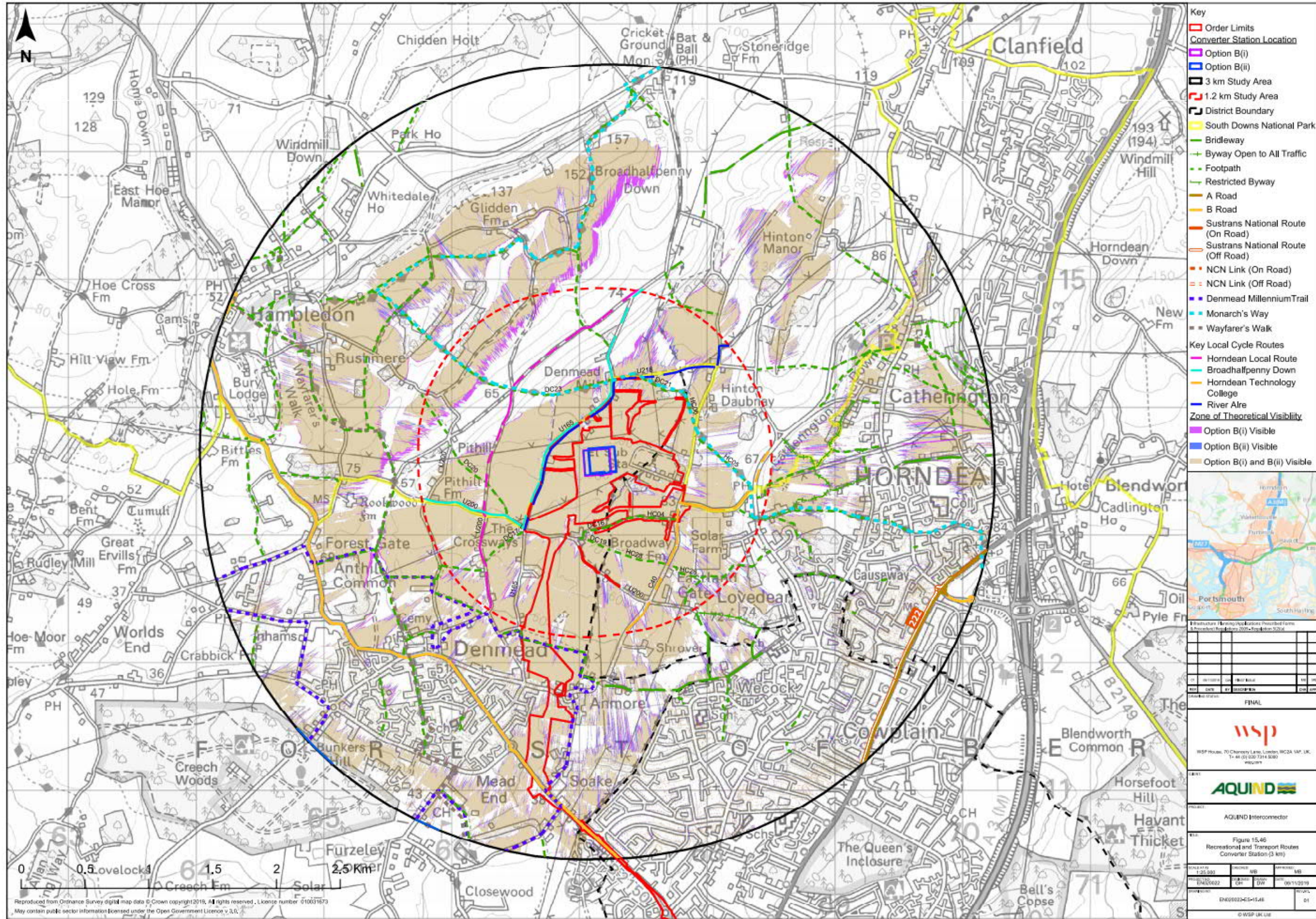
References to 'Receptor No. 17' etc below are references to the receptors as numbered in Figure 15.47 of the ES ('Residential Properties and Settlements'). The recreational receptors are those referred to in Figure 15.46 of the ES ('Recreational and Transport Routes – converter station (3km)').

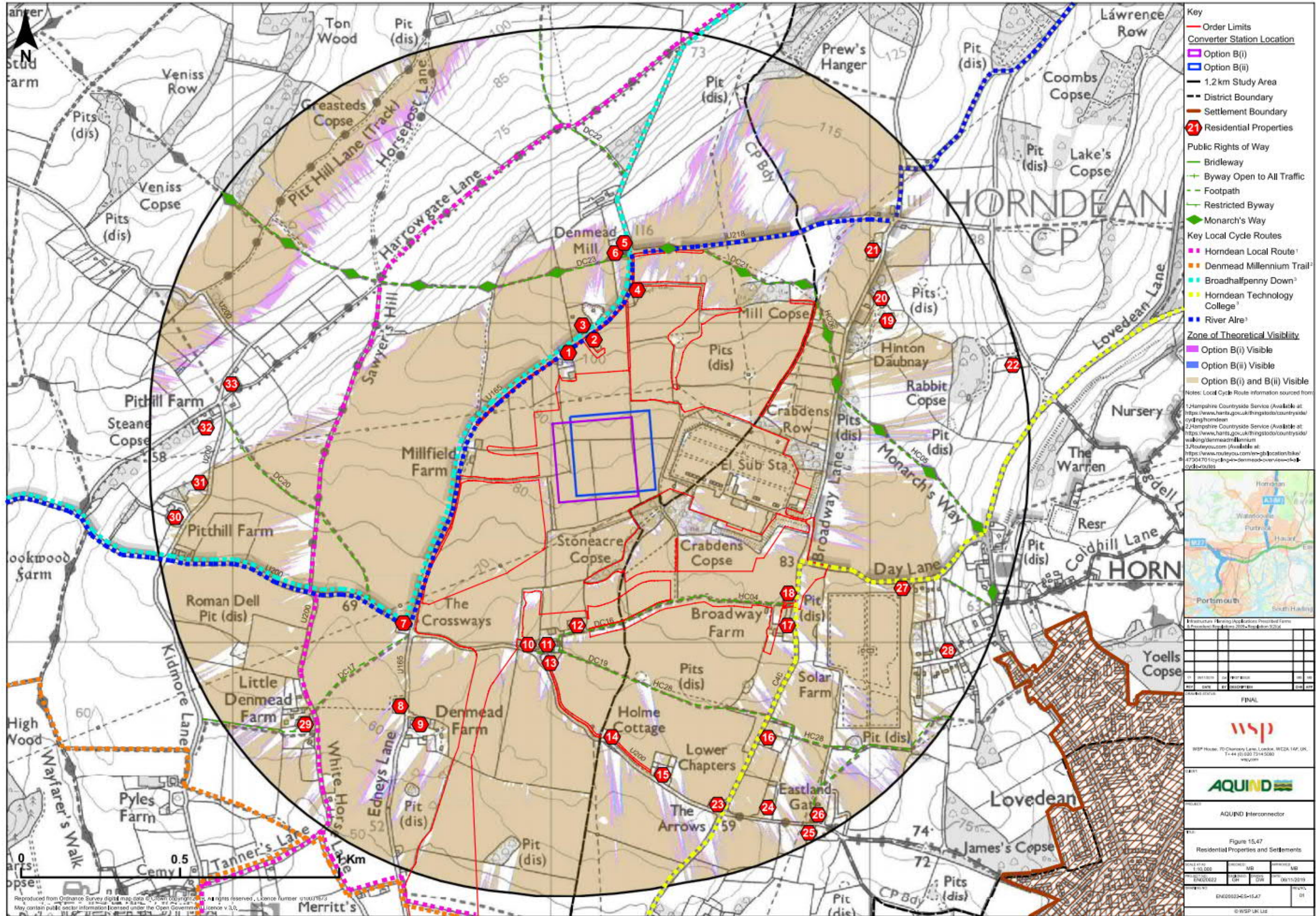
For ease of reference, both Figures are inserted as part of this Appendix below.

As set out below, our analysis concludes that the only receptor which will suffer a more significant effect than that assessed in the ES would be recreational users of the public right of way DC19 / HC28 to the south of the converter station site (number 6 below), at year 10.

As outlined above, this review has focused only on visual receptors where there would be a change in the magnitude of impact as a result of ash dieback. It has been informed by the Ash Dieback Survey Findings which considered the woodlands, hedgerows and linear tree belts surrounding the proposed development within and in the immediate vicinity of the Order limits as well as considering the implications of ash dieback in the wider area.

The extent of the review was determined based on the assessor's knowledge of the site and considered the proximity of visual receptors and the extent and angle of view they would have towards the site.





Key

- Order Limits
- Converter Station Location
- Option B(i)
- Option B(ii)
- 1.2 km Study Area
- District Boundary
- Settlement Boundary
- Residential Properties

Public Rights of Way

- Bridleway
- Byway Open to All Traffic
- Footpath
- Restricted Byway
- Monarch's Way

Key Local Cycle Routes

- Horndean Local Route¹
- Denmead Millennium Trail²
- Broadhalfpenny Down³
- Horndean Technology College³
- River Alre³

Zone of Theoretical Visibility

- Option B(i) Visible
- Option B(ii) Visible
- Option B(i) and B(ii) Visible

Notes: Local Cycle Route information sourced from:

- Hampshire Countryside Service (Available at: <https://www.hants.gov.uk/hungate/countryside/cycling/horndean/>)
- Hampshire Countryside Service (Available at: <https://www.hants.gov.uk/hungate/countryside/walking/denmeadmillennium/>)
- Footways.com (Available at: <https://www.footways.com/en-gb/location/uk/479470/cycle-ways/denmead-overview-uk-cycle-routes>)

Information: Planning Applications Proposed Farms

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Figure 15.47
Residential Properties and Settlements

Scale	Scale	Scale	Scale
1:10,000	1:10,000	1:10,000	1:10,000
DATE: 06/02/2019	DATE: 07/02/2019	DATE: 08/02/2019	DATE: 09/02/2019
06/02/2019	07/02/2019	08/02/2019	09/02/2019

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RESIDENTIAL RECEPTORS:

1. Residential properties off Broadway Lane - East – Receptor No 17

The view from this receptor (5 properties off Broadway Lane) is oblique to the main view from the properties and the screening is provided by the north end of Stoneacre Copse which is relatively less affected by ash dieback. The magnitude of impact experienced by this receptor would be only marginally different from that predicted in the 2019 ES Chapter and therefore the significance of effect (detailed below) would remain unchanged.

Construction: Moderate / major (significant)

Year 0: Moderate / major (significant)

Year 10: Minor – moderate (significant)

Year 20: Minor- moderate (not significant)

2. Residential properties off Broadway Lane - East – Receptor No 18

Similar to Receptor 17 (Broadway Farm Cottages 1 and 2), the view from this receptor is oblique to the main view and the screening is provided by the north end of Stoneacre Copse which is relatively less affected by ash dieback. The magnitude of impact experienced by this receptor would be marginally greater than that predicted in the 2019 ES Chapter but the significance of effect (detailed below) would remain unchanged.

Construction: Moderate – major (significant)

Year 0: Moderate – major (significant)

Year 10: Moderate – major (significant)

Year 20: Moderate – major (significant)

3. Residential properties off Broadway Lane (south east – Receptor Nos 14, 15 and 23)

Whilst the magnitude of impact would increase slightly for the above receptors as a consequence of ash dieback within Stoneacre Copse, the increase would not be sufficient to alter the level of significance of effects identified in the 2019 ES (which are set out below):

Construction: Moderate-major to minor- moderate (significant)

Year 0: Moderate-major (significant)

Year 10: Minor-moderate (not significant)

Year 20: Minor-moderate (not significant)

RECREATIONAL RECEPTORS:

4. Users of the Monarch's Way (DC21/HC06):

Ash dieback would reduce the level of screening from the tree canopy provided by Mill Copse, however partial tree cover in the form of existing unaffected trees and standing dead wood would still provide some screening. By year 10 a new native mixed woodland belt to the south of the Copse would provide sufficient growth and density to screen views at eye level through the woodland from a section of the Monarch's Way. This area of new planting would be secured through an Option for Easement with Winchester College which will secure the New Landscaping Rights by agreement. It is also likely that lower-level growth within Mill Copse would increase in density following the loss of parts of the tree upper canopy. Planting heights would need to be managed to the south western edge of the Copse where they lie in close proximity to overhead lines: here planting could be managed to a height of 4m whilst still serving a visual screening function.

Assuming the Option for Easement is granted and Mill Copse is actively managed by the Applicant to deal with ash dieback as proposed in the OLBS, whilst the magnitude of impact would increase slightly with an increase in the extent of visibility short term, this would be insufficient to alter the level of significance of effects identified in the 2019 ES (as detailed below). The LVIA already considered that views would be most noticeable to the north east of the converter station and east of Mill Copse generating a medium magnitude of change on a high sensitivity receptor.

Construction: Moderate-major (significant)

Year 0: Moderate-major (significant)

Year 10: Moderate (significant)

Year 20: Minor -moderate (not significant)

5. Recreational receptors to the south - DC16 / HC04

A proportion of the canopy cover forming part of Stoneacre Copse which serves a visual screening function is predicted to be lost due to ash dieback. However, the existing mature native hedgerow to the north of the public right of way and covering approximately half of the public right of way would continue to serve an immediate visual screening function. Whilst users walking along the remaining section of the public right of way would experience a slight change in magnitude, the increase would not be sufficient to alter the nature of effect. By year 10 proposed hedgerow planting would have matured and would be being managed at 3-4m in height. Therefore, there is no predicted change to the levels of significance of effects assessed in the ES, (which are set out below):

Construction: Moderate (significant)

Year 0: Minor to moderate (significant)

Year 10: Minor (not significant)

Year 20: Negligible (Not significant)

6. Recreational receptors to the south - DC19 / HC28:

A proportion of the canopy cover forming part of Stoneacre Copse and which serves a visual screening function is expected to be lost as a consequence of ash dieback. From this PRoW (DC19/HC28) the magnitude of impact would be greater than that predicted in the 2019 ES until such time as the planting to the south of Stoneacre Copse and hedgerow tree planting edging the southern side of the Access Road has become well established. During construction and at year 0 this increase would not be sufficient to alter the significance of effect, but it would delay the point at which existing vegetation and the maturing mitigation planting would combine to reduce the effect to non-significant, as was predicted in the 2019 ES. This is reflected in the comparison table below where, due to the effect of ash dieback (even taking into account the Proposed Changes and mitigation measures put forward in this Change Request), the effect at year 10 has increased from Minor to Moderate, to Moderate³. However, by year 20 the combination of existing vegetation and mitigation planting would provide screening to the level predicted in the ES.

ES LVIA 2019	Change to ES 2019
Construction: Minor to moderate (significant)	No change
Year 0: Moderate (significant)	No change
Year 10: Minor to Moderate (significant)	Year 10: Moderate (significant)
Year 20: Minor to negligible (not significant)	No change

7. Recreational receptors to the south - Denmead Footpath 13 /Bridleway 41 (D13/D41):

Whilst there would be a slight change in the canopy cover of Stoneacre Copse, views across to the Copse are in the middle distance and partially screened by intervening layers of vegetation in the foreground. Whilst there would be a slight change in the magnitude of impact as a consequence of ash dieback it would be insufficient to alter the significance of effects from that predicted in the 2019 ES (which are set out below).

Construction: Negligible

Year 0: Moderate localised (significant)

Year 10: Moderate localised (significant)

³ Note that this change in the magnitude of effect is not caused by the Proposed Changes, but caused by the ash dieback despite the Proposed Changes which would mitigate the effects of this disease.

Year 20: Minor-moderate localised (not significant)

8. Recreational receptors to the east / south east - Cyclists along Day Lane / Broadway Lane

The main views for users would be around the access entranceway and new gateway link. Whilst there would be a slight change in the canopy cover in middle views across to the converter station given the overall length of route and localised nature of the view this would not be enough to alter the magnitude of impact and therefore the significance of effects from that predicted in the 2019 ES (which are set out below).

Construction: Moderate (significant)

Year 0: Moderate (significant)

Year 10: Minor (not significant)

Year 20: Minor (not significant)

9. Transport users - Broadway Lane (east) / Day Lane and Broadway Lane (south) – within immediate vicinity of the access road / north of Lovedean Substation

The main views for users would either be around the access entranceway and new gateway link, across to the converter station from the north east along Broadway Lane or where the onshore cable route runs south through Section 2 with views across to the converter station. Whilst there will be a slight change in the canopy cover in middle views this would not be enough to alter the magnitude of impact and therefore the significance of effects from that predicted in the 2019 ES (which are set out below).

Construction: Moderate (significant)

Year 0: Moderate (significant)

Year 10: Moderate (significant)

Year 20: Moderate (significant)

The review concludes that whilst there would be a short-term change in the significance of visual effects for users of DC19/HC28 at year 10, there would be long-term benefits associated with the management of Stoneacre Copse and Mill Copse both in terms of strengthening landscape features and also delivering biodiversity benefits. The woodland structure and composition would be restored.

Ash lost would either be left as standing dead wood or felled where it is a plant health risk or a safety risk. Through selective clearance added benefits will result from natural regeneration as well as selective planting contributing not only to the density of canopy cover but also providing greater screening at eye level through regenerated planting.

Appendix 3 – Ash Dieback Survey Findings

DOCUMENT

Document	Ash Dieback Survey Note
Revision	001
Document Owner	WSP UK Limited
Prepared By	M. Marsh
Date	6 November 2020
Approved By	M. Wood
Date	10 December 2020

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APPENDICES

Appendix 1 – Ash Dieback Survey Figure

1. ASH DIEBACK SURVEY FINDINGS

1.1. INTRODUCTION

- 1.1.1.1. Ash dieback is caused by the fungus *Hymenoscyphus fraxineus* which is spread by wind-borne spores and poses a threat to the common ash tree by damaging the vascular tissues of the tree, in turn causing branches to die back due to a lack of water and nutrient supply. The disease was first officially recorded in the UK in 2012 and is now widespread across the UK and Europe.
- 1.1.1.2. WSP was commissioned to undertake a non-intrusive walkover survey on 29 September 2020 to review the presence and extent of Ash dieback disease in the woodlands surrounding the existing National Grid Substation at Lovedean, Hampshire.
- 1.1.1.3. The results of the survey have been used to understand the impact the disease may have on the role that the existing trees and woodland are anticipated to play in screening the Proposed Development's Converter Station and form the basis of proposed mitigation methods set out in the Applicant's Change Request (December 2020), including the review of the ES provided as part of that request.
- 1.1.1.4. It should be noted that the extent of ash dieback was only a minor issue a few years ago, however the disease has spread more rapidly than expected. The results of this survey alter the position adopted in the Landscape and Visual Impact Assessment (LVIA) (Chapter 15 of the ES (APP-130)) which rely on the future baseline visual screening function of existing woodland and hedgerows with hedgerow trees to integrate the proposed Converter Station into its surroundings.
- 1.1.1.5. Due to the scale of ash dieback presented in this study, the extent of visual screening will lessen from that which was assumed in the LVIA. Mitigation measures to address this and therefore minimise the impact on visual screening and the conclusions of the LVIA are outlined in Section 1.4. It is hoped that the proposed mitigation measures will give the Local Planning Authorities, and particularly the South Downs National Park Authority (SDNPA), the reassurance that the Applicant is being proactive in ensuring that the future baseline will remain unchanged.

1.2. METHODOLOGY

- 1.2.1.1. Ash dieback is categorised on a scale of 1 - 4 as set out in '*Ash Dieback: A Guide for Tree Owners*' (June 2020)¹, where:
- Class 1: 75 - 100% of the crown remains;
 - Class 2: 51 - 75% of the crown remains;
 - Class 3: 26 - 50% of the crown remains; and

- Class 4: 0 - 25% of the crown remains.

1.2.1.2. This survey was carried out in accordance with the guidance issued by the Tree Council, the extent of which is shown on Plate 1.1. This identifies each of the woodland areas around Lovedean substation subject to survey, as well as a number of individual trees outside of the woodlands. In undertaking an assessment of the affected trees, a categorisation approach was applied to quantify the impacts to both woodlands and individual trees as set out below.

1.2.1.3. It is important to note that the colour categories applied to the woodland areas take into account the impact of ash dieback disease. That is, the colour shown is a reflection of the extent the disease has progressed and the population percentage of ash in the woodland for that area. For example, an area with a high population of ash and a high infection rate is coloured red in the plan.

1.2.2. INDIVIDUAL TREES

1.2.2.1. Individual trees were assigned a category based on their remaining level of leaf cover, calculated as a percentage of total expected tree cover, and the individual tree colours shown on Annex 1 (Ash Dieback Survey Figure) are an indication of this cover:

- Red 0 - 25%: Trees will not recover and will be lost in under 1 year;
- Yellow 25 – 50%: Trees are unlikely to recover and will be lost in around 2 years;
- Light Green 50 – 75%: Some trees may recover but some losses may occur in the next 2 to 4 years; and
- Dark Green 75 – 100%: Trees may recover but losses are anticipated in the next 4 to 8 years.

1.2.2.2. Where ash trees stood out as an individual rather than a component of hedges, they were recorded as such and awarded a category based on remaining leaf cover alone. The extent of disease present within the study area is consistent with that found in the region.

1.2.2.3. The loss of these trees is inevitable and will be noticeable in the local context but is not considered to be detrimental to the screening value of hedges within the study area and would not affect the assessment set out in the LVIA.

1.2.3. WOODLAND

1.2.3.1. Woodlands were assigned a category between High and Low to represent the level of ash dieback progression. The hatched colours shown on Annex 1 are an indication of both the progression of infection and the population density within each individual woodland, where red hatching represents high progression and green hatching represents low progression.



Plate 1.1 - Woodlands Surveyed

1.3. SUMMARY OF FINDINGS

1.3.1.1. The findings of the ash dieback survey are shown in Appendix 1 and are summarised in Sections 1.3.2 to 1.3.7 below, along with a brief description of their function in terms of visual amenity in relation to the proposed Converter Station and Lovedean Substation as set out in the LVIA. Woodland identification correlates with the letters assigned on Plate 1.1.

1.3.2. WOODLAND A - MILL COPSE

1.3.2.1. **Woodland A is outside the Order limits. Without management, losing ash in this woodland would have a significant impact on visual amenity as assessed in the LVIA.**

1.3.2.2. This woodland provides visual screening from the Monarch's Way which wraps around the northern edge of the woodland. The primary focus here is to ensure that there is sufficient vegetation at eye level (including understory planting) to screen views across to the proposed Converter Station. The woodland serves a secondary function in contributing to a layering of woodland partially screening views from more elevated positions.

- The mature canopy of the woodland consists of ash, oak, cherry, and occasional elm. The understory consists of elder, field maple holly and yew;
- The woodland is well established and other than ash dieback disease is in good condition with occasional ancient coppice stools found in the woodland indicating the historic management practices carried out on site. Rabbit are clearly present on site and would be a consideration in mitigation planting;
- Consists of approximately 75% ash;
- The proportion of canopy cover which would be lost as a consequence of ash dieback is 75%;
- Based on natural regeneration oak cherry and hazel would be suitable replacements.

1.3.3. WOODLAND B

1.3.3.1. This small woodland is within the Order limits. It contributes towards visual screening from the Monarch's Way and from residential properties off Broadway Lane and north of the existing Lovedean Substation. It serves a secondary function in providing a layering of woodland partially screening views from more elevated positions.

- The woodland is formed largely at the periphery of the dell (sunken area). The mature canopy is dominated by ash with oak. The understory consists of field maple, elder, cherry, hazel,
- Consists of approximately 80% ash;

- Of the ash present 50-75% of leaf cover remains, suggesting the disease is more advanced in this location;
- As the mature ash trees are around the edge of the dell, screening above 7-10m tall is likely to be lost in the next four to six years; and
- The proportion of canopy cover which would be lost as a consequence of ash dieback is 80%.

1.3.4. WOODLAND C

1.3.4.1. This woodland is within the Order limits (New Connection Rights sought) and is owned by National Grid. It contributes towards partial visual screening from residential properties off Broadway Lane and north of the existing Lovedean substation. It serves a secondary function in providing a layering of woodland partially screening views from more elevated positions and contributing to the screening function of the existing Lovedean substation.

- This woodland appears to be a plantation largely consisting of maple species. It does not appear to have been managed in recent years and would benefit from thinning;
- Some ash was present at the edge of the woodland, picked up separately in the survey;
- The proportion of canopy cover which would be lost as a consequence of ash dieback is less than 20%;
- The majority of the woodland consists of maple with some ash at the northern edge; and
- This woodland is not a concern in terms of ash dieback but would benefit from management through thinning / re-spacing to ensure long-term viability of the woodland.

1.3.5. WOODLAND D – CRABDENS ROW – PARTIAL ANCIENT WOODLAND

1.3.5.1. This woodland is outside the Order limits and is owned by National Grid. It screens the existing Lovedean substation. As a secondary function it contributes to a layering of woodland partially screening views from more elevated positions.

- Although there is no clear evidence of long-standing management on site, this woodland is in good condition and would benefit from proactive management. The area of ancient woodland to the northern and western ends is clearly separated on site by the younger mitigation planting found in the southern end and adjacent to the substation. The mature canopy of the woodland is oak and ash with holly hazel, elm and sorbus forming the understory.

- Consists of approximately 65% ash by population, most densely present in the north east corner along with some very large coppice whilst the north west thinner strip is approximately 80% ash population;
- A substantial amount of ash in the woodland is within proximity of the existing substation;
- The majority of ash trees present have 50-75% of leaf cover;
- The proportion of canopy cover which would be lost as a consequence of ash dieback is approximately 70%; and
- If replacement were to be undertaken, oak is advised.

1.3.6. WOODLAND E – CRABDENS COPSE - PARTIAL ANCIENT WOODLAND

1.3.6.1. This woodland is outside the Order limits and is owned by National Grid. It screens the existing Lovedean substation. As a secondary function it contributes to a layering of woodland, partially screening views from the south east and east, particularly residential properties off Broadway Lane and Broadway Lane (south) as well as recreational receptors to the south, south east and east.

- The nature of the woodland at its western extent is in keeping with that of woodland F (see 1.3.7). However, more mature ash trees of greater girth are present and these were possibly raised as standards to allow coppicing to occur below. Several of these ash standards may be of value as timber trees. The western end of the woodland clearly exhibits ancient features. The eastern end of this woodland can be differentiated on site as it largely consists of trees planted to form a screen for the substation. Although some management has been undertaken in this woodland, it would benefit from thinning to allow the tree population to reach their potential unhindered;
- The western end of the woodland is approximately 70% ash by population with some very large mature ash as well as some old coppice;
- The disease is present in various stages but as a whole leaf cover is >75%;
- The proportion of canopy cover affected and the consequences as a result of ash dieback is 70% canopy cover over the whole woodland; and
- Tree loss as a result of the disease within the next six years is likely to be significant.

1.3.7. WOODLAND F – STONEACRE COPSE – ANCIENT WOODLAND

1.3.7.1. **This woodland is outside the Order limits. Without management, losing ash in this woodland would have a significant impact on visual amenity as assessed in the LVIA.**

1.3.7.2. It provides important visual screening from residential properties off Broadway Lane and Broadway Lane (south) as well as recreational receptors to the east, south east and south. The woodland serves a secondary function in providing a layering of woodland partially screening views from more elevated positions and screening the existing Lovedean substation.

- This ancient woodland demonstrates many of the features to be expected within such a feature. Ancient coppice of ash in some areas are indicative of former management as are the long-established hazel coppice stools found throughout the wood. Although the woodland has received little or no proactive management in recent decades, dilapidated pens were found throughout the wood and are clear indications that the wood has in the past been worked as part of a pheasant shoot. Notwithstanding ash dieback disease the woodland is in good condition but would benefit from more proactive management;
- The woodland consists of approximately 80% ash in the southern half with oak taking dominance in the northern end up to the access track where the population of ash is approximately 40%;
- Of the ash present 25-50% of leaf cover remains;
- The proportion of canopy cover affected and the consequences as a result of ash dieback is 70% canopy over the whole woodland;
- The woodland supports some ancient coppice stools and very old crab apple species and may have been managed as coppice for a number of decades; and
- Ash dieback is present within this woodland and the infection rate varies from 50% remaining leaf cover to full leaf cover. The disease is likely to spread and cause the loss of mature trees over the next six to eight years.

1.4. **MITIGATION / MANAGEMENT MEASURES TO ADDRESS ASH DIEBACK IN ORDER TO MAINTAIN LVIA FUTURE BASELINE**

1.4.1.1. In light of the findings of the ash dieback survey of 29 September set out above, a number of measures are proposed to provide suitable mitigation and to maximise the visual screening function of Mill Copse (**Woodland A**) and Stoneacre Copse (**Woodland F**), in order to ensure the assumptions for the future baseline and LVIA conclusions contained in the Environmental Statement continue to be robust.

1.4.1.2. The LVIA is also partially reliant on **Woodland B** which contributes to visual screening of the proposed Converter Station and proposed management measures are similar for this woodland.

1.4.1.3. **The screening functions of the other woodlands listed (Woodlands C, D and E) will not be affected by ash dieback to such an extent that the Environmental Statement assumptions will be affected.**

1.4.1.4. Woodland management measures proposed in respect of Mill Copse (**Woodland A**), Stoneacre Copse (**Woodland F**) and **Woodland B** are, in broad terms:

- Planting outside of the woodland to provide additional screening value;
- Including a programme of natural regeneration of specific areas of woodland;
- Selective felling of the affected ash trees and planting of new trees; and
- Managing the affected ash and planting to minimise the porosity of screening.

1.4.1.5. In addition to the above, and in keeping with industry guidelines, it would be desirable to retain some standing deadwood within the woodlands. This will aid screening and will provide increased biodiversity value as a secondary benefit.

1.4.1.6. More details in respect of the measures proposed in respect of Woodlands A, B and F in order to maintain the future baseline for LVIA are set out below. These proposals will be captured in the Outline Landscape and Biodiversity Strategy (OLBS) to be submitted at Deadline 6.

1.4.2. **WOODLAND A - MILL COPSE**

1.4.2.1. Proposed management measures are :

- Planting a 10 m strip of new woodland outside the southern edge of the woodland to provide additional screening value (to the south of Mill Copse on Winchester College land) – this will form a screen at eye level through a mix of trees and understorey planting and improve landscape and ecological connectivity with other existing and proposed areas of planting;
- Allowing natural regeneration of woodland to increase the density of understorey planting and ground flora which will have positive secondary effects in terms of biodiversity;
- Selective felling of ash which is between 0-50% leaf cover replacing with alternative species and allowing for some standing dead wood; and
- Introduction of a monitoring and management plan for remaining ash throughout the operational lifetime of the Converter Station reviewing actions on yearly basis to determine the course of action to be taken.

1.4.3. **WOODLAND F– STONEACRE COPSE – ANCIENT WOODLAND**

1.4.3.1. Proposed management measures are:

- Allowing natural regeneration of woodland to increase the density of understorey planting and ground flora which will have positive secondary effects in terms of biodiversity;
- Selective felling of ash which is between 0-50% leaf cover replacing with alternative species and allowing for some standing dead wood;

- Introduction of a monitoring and management plan for remaining ash throughout the operational lifetime of the Converter Station reviewing actions on yearly basis to determine actions to be taken; and
- Planting outside of the woodland (but within the Order limits) to provide additional screening value – strengthen the density of woodland, allow for a varied age and structure and improve landscape and ecological connectivity with other existing and proposed areas of planting.

1.4.3.2. The Applicant will prepare a management plan in consultation with Natural England for this ancient woodland.

1.4.3.3. New planting within the Order limits and around the periphery of the ancient woodland consisting of woodland, understorey planting, scrub and ground flora will strengthen the existing woodland. These measures will improve the woodland’s visual screening function as well as its value for biodiversity and landscape / ecological connectivity. Indicative landscape mitigation plans in Figure 15.48 and 15.49 of the ES (REP1-036 and 037 respectively) and landscape mitigation plans for Option B(ii) (REP1-137) submitted for Deadline 1 will be updated for submission at Deadline 6.

1.4.4. WOODLAND B

1.4.4.1. Proposed management measures are:

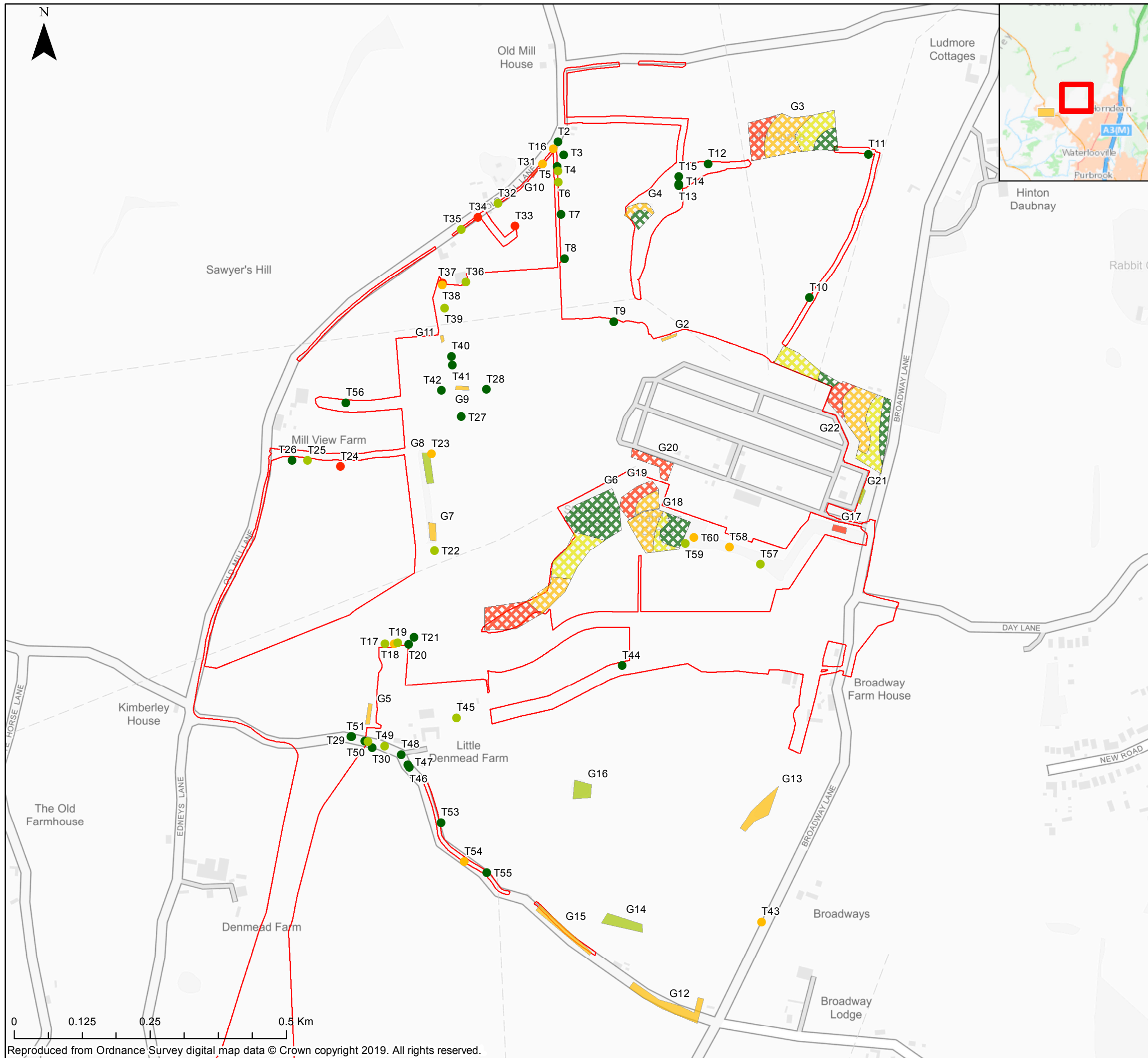
- Selective felling of ash which is between 0-50% leaf cover replacing with alternative species and allowing for some standing dead wood;
- Introduction of a monitoring and management plan for remaining ash throughout the operational lifetime of the Converter Station reviewing actions on a yearly basis to determine the course of action to be taken; and
- Planting outside of the woodland to provide additional screening value.

1.4.4.2. This small woodland lies within the Order Limits and measures are already proposed to strengthen the existing woodland with further woodland and understorey planting to improve its visual screening function as well as its value for biodiversity and landscape / ecological connectivity. Indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) and landscape mitigation plans for Option B(ii) (REP1-137) submitted at Deadline 1 will be updated and submitted at Deadline 6.

1.5. IMPLICATIONS FOR FUTURE BASELINE – OPPORTUNITIES FOR NON-ESSENTIAL INTERVENTION

- 1.5.1.1. In order to maintain the LVIA future baseline there is no need to carry out any management of Woodlands C, D or E. However, if the Applicant wished to explore opportunities to enhance these woodlands through voluntary agreement with National Grid then management measures could be employed with the co-operational of National Grid.

Annex 1 – Ash Dieback Survey Figure



Key

- Order Limits
- Ash Dieback Progression**
 - High
 - Low
- Remaining Leaf Cover**
 - 0-25%
 - 25-50%
 - 50-75%
 - 75-100%

The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2017 – Regulation 5(2)(a)

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01	14/10/2020	JA	FINAL	CP	ND

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PROJECT:
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TITLE:
**Figure 1
Ash Dieback Survey**

SCALE AT A3 1:7,000	CHECKED: CP	APPROVED: ND
PROJECT NO: EN020022	DESIGNED: JT	DRAWN: JA
DRAWING NO: EN020022		DATE: 14/10/2020
REV.NO. 01		

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