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Our Ref: 12392

DWD

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Mr [REDACTED]
Planning Case Manager
Energy Infrastructure Planning
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By email: [REDACTED]@energysecurity.gov.uk

Dear Mr Dawkins

THE IMMINGHAM OPEN CYCLE GAS TURBINE ORDER 2020 (S.I. 2020 NO. 847) (THE 'ORDER')

APPLICATION FOR A NON-MATERIAL CHANGE ORDER IN RESPECT OF A MINOR ADDITION TO THE ORDER LIMITS AND ASSOCIATED CHANGES TO SCHEDULE 11 'DOCUMENTS AND PLANS TO BE CERTIFIED'

THE IMMINGHAM OPEN CYCLE GAS TURBINE (VPI 'B') PROJECT, LAND NORTH OF THE VPI COMBINED HEAT AND POWER ('CHP') POWER STATION, ROSPER ROAD, IMMINGHAM, LINCOLNSHIRE, DN40 3DZ

Introduction

We write on behalf of VPI Immingham B Limited (the 'Applicant' and 'Undertaker') to submit an application for a non-material change order (the 'Application' or 'NMC') to 'The Immingham Open Cycle Gas Turbine Order 2020' (S.I. 2020 No. 847) (PINS Ref. EN010097) (the 'Development Consent Order' or 'DCO') pursuant to Section 153 of 'The Planning Act 2008' (the 'PA 2008') and Regulation 4 of 'The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011' (the '2011 Regulations'), to the Secretary of State for Energy Security and Net Zero ('DESNZ').

The registered address of the Applicant is 4th Floor, Nova South, 160 Victoria Street, London, SW1E 5LB. The registered address of DWD Property and Planning Limited (the 'Agent') is 69 Carter Lane, London, EC4V 5EQ.

The remainder of this letter summarises the relevant provisions of the DCO and the non-material change that is sought and provides the information required by the 2011 Regulations.

The Order

'The Immingham Open Cycle Gas Turbine Order 2020' (S.I. 2020 No. 847) was made by the Secretary of State ('SoS') for Business, Energy and Industrial Strategy on 7th August 2020 and came into force on 1st September 2020. We can confirm that the Applicant is the person who applied for the DCO.

The DCO grants development consent, subject to certain provisions, for the 'Authorised Development', which includes the construction, operation and maintenance of an electricity generating station comprising an Open Cycle Gas Turbine ('OCGT') power station with a gross electrical output of up to



299 megawatts and associated development. The OCGT power station is known as the VPI-Immingham B Project.

A Correction Order, 'The Immingham Open Cycle Gas Turbine (Correction) Order 2021' (S.I. 2021 No. 581), was made in respect of the Order on 14 May 2021 and came into force on 17 May 2021 ('the 2021 Correction Order'). The 2021 Correction Order corrected minor drafting and typographical errors within the Order.

The Secretary of State ('SoS') has previously granted two NMC applications submitted by the Applicant. The first NMC granted by the SoS was for the inclusion of a Synchronous Condenser under Work No. 1 at Schedule 1 ('Authorised Development') of the Order. The 'Immingham Open Cycle Gas Turbine (Amendment) Order 2023' (S.I. 2023 No. 119) was made on 31 January 2023 and came into force on 1 February 2023 ('the 2023 Amendment Order'). The second NMC was granted in respect of minor changes to Schedule 12 ('Design Parameters') of the Order. 'The Immingham Open Cycle Gas Turbine (Amendment) (No. 2) Order 2024' (S.I. 2024 No. 446) was made on 27 March 2024 and came into force on 28 March 2024 ('the 2024 Amendment Order').

Copies of the Order, the 2021 Correction Order, the 2023 Amendment Order and the 2024 Amendment Order accompany this NMC Application.

The Application Documents

The Application comprises the following documents;

1. An Application Statement (in the form of this letter).
2. The original DCO.
3. The 2021 Correction Order.
4. The 2023 Amendment Order.
5. The 2024 Amendment Order.
6. A draft Amendment Order – in the form that the Applicant requests to reflect the changes set out in this letter.
7. A tracked change version of the DCO Order – a copy of the DCO (incorporating the changes made by the 2021 Correction Order and 2023 and 2024 Amendment Orders), with the proposed amendments shown as track changes.
8. A Regulation 4(2) Checklist – a checklist confirming the details required by Regulation 4(2) of the 2011 Regulations (as Attachment 1 to this Letter).
9. Consultation and publicity information, including a copy of the Regulation 7(3) letter and proposed consultee list submitted to the Secretary of State on 27th January 2025 (and subsequently updated with additional parties following DESNZ's decision on 19th February 2025); and
10. A copy of the Regulation 6 Notice to be published in local newspapers (the Grimsby Telegraph and the Scunthorpe Telegraph) circulating within the vicinity of the land to which the DCO relates for two consecutive weeks (6th and 13th March 2025). Copies of the Notice as published will be provided as part of the Consultation Statement to be submitted after the consultation requirements have been completed.
11. DCO Non-Material Change Supplementary Book of Reference (February 2025)

12. Updated certified plans comprising the following:

- Land Plans – Revision 2 (DCO Doc Ref. 4.2)
- Works Plans – in respect of Work Nos. 4, 5 and 6 – Revision 4 (DCO Doc Ref. 4.3)

13. Updated Cumulative Impact Assessment.

All of the Application documents can be downloaded using the following link to a secure file share site.

NMC Application file share download link: <https://dwd.ctit.co/url/hytcnxea2z3dj2jn>

The application fee of £6,891.00 has been paid electronically.

This non-material change to the Order would make the following changes to the authorised development ('the Proposed Changes'), through amendments to Certified Documents '4.2 – Land Plans' and '4.3 - Works Plans':

- the inclusion of additional land to access and utilise an existing pipe-bridge adjacent to the Order limits on which to carry the gas, electrical and utilities and services connections between the existing VPI CHP Site and the VPI OCGT Project Site; and
- the use of an additional area of land on the existing VPI CHP Site to accommodate a minor deviation in the gas pipeline routing.

The NMC Application is also supported by a 'Supplementary Book of Reference' which details the land interests and parties which are affected by the Proposed Changes. No new parties are introduced through the Proposed Changes.

Further information on the Proposed Changes to the Order (including plans) is detailed in the following section of this letter.

The remainder of this letter covers the following matters:

- the proposed non-material changes;
- the approach to materiality;
- the scope of the proposed non-material change application;
- the scope of the proposed consultation; and
- the indicative programme.

The proposed non-material changes

The VPI OCGT Project is currently under construction with most groundworks completed and delivery and erection of major components underway. All pre-commencement requirements at Schedule 2 of the Order have been discharged by the relevant planning authority, North Lincolnshire Council ('NLC').

Design and routing of the main gas pipeline, electrical connection and utilities and services connections (the 'VPI Connections'), is currently underway. The Order currently includes an area of land for the Undertaker to construct a new pipe-bridge to enable the VPI Connections between the VPI OCGT Project and the existing VPI CHP Site. This land is shown in the original DCO (Document Ref. 4.3 – Works Plans). The Undertaker proposes to make use of an existing pipe-bridge adjacent to the

Order land on which to carry the VPI Connections (Work Nos. 4, 5 & 6) between the existing VPI CHP Site and the VPI OCGT Project Site, and to also use an area of land on the existing VPI CHP Site to accommodate a minor deviation in the gas pipeline routing (Work No. 4).

The existing pipe-bridge was constructed in 2024 and is owned and operated by VPI Energy Park A Ltd, a sister company of the Undertaker. It benefits from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039). The existing pipe-bridge has capacity to support the VPI Connections. The additional land on the existing VPI CHP Site is required so that the gas pipeline can be installed within the existing VPI CHP Site boundary.

Property agreements are in place to allow the Undertaker use of the existing pipe-bridge and additional gas pipeline land for routing the VPI Connections to the VPI OCGT Project Site.

The pipe-bridge and additional gas pipeline land are outside of the current Order limits and therefore this NMC proposes minor extension to the Order Limits in order allow for the use of this infrastructure and land.

In order to include the existing pipe-bridge and additional gas pipeline land within the Order limits, the NMC application seeks to amendment to selected Certified Documents listed at Schedule 11 of the Order including '3.1 – Book of Reference', '4.2 – Land Plans' and '4.3 - Works Plans' to include the additional areas for Work No. 4 (Gas Connection), Work No. 5 (Electrical Connection) and Work No. 6 (Utilities and Services Connections) within the Order limits

The area of land proposed to be added into the Order limits, along with the changes and extensions to Work Nos. 4, 5 and 6 are shown on the plan at **Appendix 1** to this letter.

The Proposed Changes are assessed to be non-material in nature and require no alteration of the powers of acquisition at Part 5 of the Order as the Undertaker has the necessary land agreements in place already. Similarly, on account of the Proposed Changes representing a minor adjustment to the positioning of Work Nos. already consented under the Order, it is not assessed that the NMC will result in any materially new or different environmental effects. This NMC application includes information to demonstrate there are no changes to effects assessed in the Environmental Statement that was produced for the VPI OCGT Project.

It is not considered that the Proposed Changes will have any implications for habitats and protected species, however, the Applicant has reviewed the 'No Significant Effects Report' ('NSER') that was produced for the Project and provided information on this as part of the NMC application. The NSER also considered the previous non-material changes and the effects arising from them.

The following should be noted with regard to the proposed additional land required for the VPI Connections:

- The pipe-bridge is constructed, is owned and operated by a VPI sister company and agreements are in place to allow its use by VPI.
- Property agreements are in place to allow the VPI Connections to utilise the additional gas, electrical, utilities and services connections land.

- No alteration of the powers of acquisition at Part 5 of the Order are sought, and no powers of compulsory acquisition are sought over any 'new' land to be brought within the Order limits by the proposed NMC.
- The use of the additional land will not result in any materially new or different significant environmental effects as it is currently developed and close to the route shown in the current DCO plans.
- No additional items are required to Schedule 1, Work Nos. 1-6 of the Order, the NMC simply proposes a small adjustment to the position of works already consented under the Order, on previously developed land.
- There will be no change to emissions to air, noise pollution and landscape and visual effects as the pipe-bridge is already built and no additional works are required. Neither is it anticipated that there will be any material change to the environmental effects reported in the Environmental Statement ('ES') for the OCGT power station or any new environmental effects.
- There will be no material change to the construction programme duration.

The Undertaker therefore seeks to amend selected documents within Schedule 11 ('Documents to be Certified') of the Order, these include: '3.1 – Book of Reference', '4.2 – Land Plans', '4.3 - Works Plans' and '2.1 – Draft Development Consent Order' to include the Proposed Changes within the DCO.

The Approach to Materiality

Schedule 6 of the PA 2008 makes provision for the SoS to grant both material and non-material changes to a DCO.

There is no statutory definition of 'materiality' for the purposes of either the PA 2008 or the 2011 Regulations. The Guidance makes clear that such decisions will inevitably depend on the circumstances of each specific case. Notwithstanding this, the Guidance sets out four examples of characteristics which are likely to indicate whether or not a change is material. These characteristics are considered in turn below.

Environmental considerations

The Guidance states that a change might be considered material if it would result in the need for an updated ES to take account of:

- a new significant effect that was not identified in the ES for the consented project; or
- a materially different effect (positive or negative) when compared to the ES for the consented project.

As stated above, it is not anticipated that the Proposed Changes will result in any new or materially different environmental effects compared to those reported in the ES for the OCGT power station.

The Applicant's assessment of the proposed changes against the ES for the OCGT power station – in terms of any potential changes in significant environmental effects – has determined that the conclusions of the ES remain valid. This is set out in Table 1 below, and takes account of the non-material changes which have previously been made to the DCO (noted above).

Table 1: Summary of Potential Changes in Significant Effects

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
Air Quality – Chapter 6	Construction	No significant effects identified.	No change	No additional or altered emissions from those assessed in the ES. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		
Traffic and Transportation – Chapter 7	Construction	No significant effects identified.	No change	No additional construction or operational transport movements from those assessed in the ES. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		
Noise and Vibration – Chapter 8	Construction	No significant effects identified.	No change	The existing pipe-bridge is already in use and was constructed in 2024 (benefitting from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039)). The deviation in gas pipeline routing will not lead to an increase in noise emissions above those assessed in the ES, nor a change in the location of noise emissions which could cause different impacts. There will be no change in noise emissions from those assessed in the ES. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
Ecology and Nature Conservation – Chapter 9	Construction	No significant effects identified.	No change	The existing pipe-bridge is already in use and was constructed in 2024 (benefitting from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039)). The addition of a further pipeline to the bridge will lead to no ecological effects. The area in which the gas pipeline will be constructed beyond the pipe-bridge is developed operational land within VPI Immingham CHP Plant with a sealed surface with no ecological habitats present. This was confirmed by the Ecological Baseline Report (January 2023) for the Humber Zero – VPI Immingham Carbon Capture Plant (PA/2023/421) application which included the area required for the gas pipeline. There is no potential for ecological effects to occur. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		
Landscape and Visual Amenity – Chapter 10	Construction	No significant effects identified.	No change	The existing pipe-bridge is already in use and was constructed in

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
	Operation	No significant effects identified.		2024 (benefitting from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039)). The addition of a further pipeline along the bridge will not lead to any adverse visual effects, and was in any case works comprised within the original 'authorised development' in the DCO. The change in location of the gas pipeline will not lead to increased visual impacts. There will be no increase in visual impacts from those assessed in the ES. No change in effects is identified.
	Decommissioning	No significant effects identified.		
Ground Contamination and Hydrogeology – Chapter 11	Construction	No significant effects identified.	No change	The existing pipe-bridge is already in use and was constructed in 2024 (benefitting from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039)). The addition of a further pipeline to the bridge will lead to no contamination or hydrogeology impacts. The additional land required for the gas pipeline route
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
				<p>alteration was included within a Supplementary Phase 1 Geo-environmental Assessment included within the DCO Application for the OCGT power station (Application Document Ref. APP-097). The main risks identified pertained to the direct contact and inhalation of contaminants by construction workers as well as the potential for impacted shallow groundwater to migrate into the deeper groundwater via enhanced pathways. Suitable mitigation was included within the ES to mitigate these risks so the effects will not be significant. There will be no change in ground contamination and hydrogeology effects from those assessed in the ES. No change in effects is identified.</p>
<p>Flood Risk, Hydrology and Water Resources – Chapter 12</p>	<p>Construction</p>	<p>No significant effects identified.</p>	<p>No change</p>	<p>The existing pipe-bridge is already in use and was constructed in 2024 (benefitting from a planning permission which was granted in 2018 by NLC (PA/2018/918) and amended in 2021 (PA/2021/1039)). The addition of an extra</p>
	<p>Operation</p>	<p>No significant effects identified.</p>		
	<p>Decommissioning</p>	<p>No significant effects identified.</p>		

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
				<p>pipe to the bridge will have no impact on the drain it crosses. The change in location of the gas pipeline will have no change in effect from the ES. There will be no change in impermeable area and no change in flood risk. No change in effects is identified.</p>
Cultural Heritage – Chapter 13	Construction	Moderate adverse (significant).	No change	<p>The pipe-bridge is already constructed and the addition of a further pipeline to the bridge will lead to no new heritage effects. The heritage assessment completed within the ES for the OCGT power station found no known heritage assets within the location of the proposed gas pipeline works (see APP-069). Archaeological investigation was only required to be carried out on undeveloped land within the site boundary and therefore no further investigation is required for the additional land required for the gas pipeline (see APP-072) which is already developed. There will be no change in heritage effects from those assessed in the ES. No change in effects is identified.</p>
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		

Environmental topic	Residual Effect as reported in the original Environmental Statement that accompanied the DCO application		Potential change in effect as a result of the proposed changes	Reasoning
Socio-Economics – Chapter 14	Construction	Moderate beneficial (significant)	No change	No changes are expected to the predicted employment levels for the VPI OCGT Project during all stages of the VPI OCGT Project. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		
Sustainability and Climate Change – Chapter 15	Construction	No significant effects identified.	No change	The proposed changes will not result in any significant change to greenhouse gas emissions or the resilience of the VPI OCGT Project to climate change and therefore no change is identified in terms of climate change effects. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		
Human Health – Chapter 16	Construction	No significant effects identified.	No change	No change to emissions (air or water), noise levels, transport or land contamination will occur, and therefore no change is identified in terms of impacts on human health. No change in effects is identified.
	Operation	No significant effects identified.		
	Decommissioning	No significant effects identified.		

The NMC Application includes an updated Cumulative Impact Assessment, taking account of other developments that have come forward since the original 2019 Cumulative Impact Assessment reported in the ES for the OCGT power station. This concludes that there is no change in terms of cumulative impacts, or the significance of effects presented in the ES as a result of the proposed Non-Material Change.

Habitats and Protected Species

The Guidance states that a proposed change to a project might be considered material if it would invoke a need for a Habitats Regulations Assessment ('HRA'), or the need for a new or additional licence in respect of European Protected Species.

The DCO application for the OCGT power station included a 'No Significant Effects Report' ('NSER') (Document Ref. 5.13), which considered whether there would be any Likely Significant Effects ('LSE'), which may arise from the Project, either alone or in combination with other plans or projects, upon any European designated site. The NSER did not identify any LSE, either alone or in combination with other plans or projects. The SoS's decision letter on the DCO Application confirmed their view that the Project would not lead to any adverse effect on the relevant Humber Estuary Special Area of Conservation, Special Protection Area or Ramsar site (paragraph 5.15 of the SoS's decision letter).

The Applicant has reviewed the No Significant Effects Report in light of the proposed changes and taking account of any new plans or projects within the relevant study area since development consent was granted for the VPI OCGT Project. The conclusion of this review is that there is no material change in the conclusions of the No Significant Effects Report.

The Proposed Change involve a slight enlargement of the red line boundary to incorporate an existing pipe bridge constructed for the adjacent 'VPI Immingham Energy Park 'A'. The planning application for the adjacent scheme (PA/2018/918) included a comprehensive ecology assessment as part of its Environmental Statement. That assessment concluded that there were no significant impacts or concerns regarding habitats and protected species, and identified that no European Protected Species are present within the proposed extension of the red line boundary.

The additional land required to accommodate the minor deviation in the gas pipeline routing (in the northern part of the VPI Immingham CHP Plant site) was included within a separate planning application for Humber Zero – VPI Immingham Carbon Capture Plant (PA/2023/421). An Ecological Baseline Report was produced for the site in January 2023 as part of the application. The land is developed land with a sealed surfaced with no ecological habitats and therefore no ecological effects will occur.

On this basis an updated No Significance Effects Report is not required.

Compulsory Acquisition

The Guidance states that a proposed change might be considered material if it would result in a need for the compulsory acquisition of any land that was not authorised through the existing DCO.

Whilst the Proposed Changes incorporate small areas of additional land outside the Order limits / Order land, they do not require any alteration of the powers of acquisition at Part 5 of the Order, as the Applicant has the relevant land agreements already in place. The draft variation of the DCO provided with this Application incorporates an amendment to Article 18 to make clear that the undertaker will not have compulsory acquisition powers in the additional land (and which is shown shaded orange on the revised Land Plans).

Impact on business and residents

The Guidance makes clear that the potential impact of the proposed change on local residents and businesses will also be a consideration in determining whether a change is material. The Guidance notes that material changes might include impacts 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.

The site of the OCGT power station is relatively remote from local residents, while the nearest businesses are the Humber and Lindsey refineries and the VPI CHP Plant. The Undertaker does not consider that there would be any detrimental impact upon local residents or businesses as a result of the Proposed Changes on the basis that:

- There will be a no change to the external appearance of the OCGT power station.
- There will be no increase in the footprint of the OCGT power station and no additional land is required for Work No. 1.
- There are no increases to the height of any buildings or structures which form the OCGT power station, and the pipe-bridge which is proposed to be used already exists.
- It is not anticipated that there will be any material change to the environmental effects reported in the ES for the OCGT power station or new significant environmental effects.
- There will be no change to the construction programme duration.
- The changes are very limited and immaterial when considered within the context of the overall consented Project, and its surroundings.

For the reasons set out above, it is considered that the Proposed Changes are therefore non-material.

Scope of Consultation

The 2011 Regulations set out statutory publicity and consultation requirements for non-material change applications.

Consultation and Publicity

The Undertaker wrote to DESNZ and the Planning Inspectorate ('PINS') on 8 January 2025 confirm its intention to submit a non-material change application and to outline the proposed non-material changes. A written acknowledgement was received via email from DESNZ on 14 January 2025.

The Undertaker also advised the relevant local planning authorities, North Lincolnshire Council and North East Lincolnshire Council, of the proposed non-material change application on 14th January 2025. No response was received from either local authority in response to the NMC notification email.

On 27th January 2025 the Applicant consulted the Secretary of State for DESNZ on the proposed scope of the Application. In accordance with Regulation 7(3) of the 2011 Regulations, the Applicant also submitted a letter to the SoS (accompanied by an updated list of those notified pursuant to Section 56 of the PA 2008), seeking the consent of the SoS to undertake a more focussed and targeted consultation for the Application. The updated list identified those consultees that the Applicant proposed to consult and those they did not propose to consult, along with a justification for that approach. The Regulation 7(3) letter and accompanying consultee list form part of the Application.

A response was received from DESNZ (on behalf of the Secretary of State) on 19th February 2025, confirming that it was satisfied with the proposed list of consultees and the publication proposals outlined in the Applicant's letter, subject to the inclusion of several additional parties. Following receipt of the DESNZ response letter, the additional parties have been incorporated into the NMC consultee list by the Applicant and will therefore be consulted on the Proposed Changes.

The following consultation and publicity activities will be carried out in connection with the Application:

- The Application documents and the notice publicising the Application pursuant to Regulation 6 of the 2011 Regulations will be published on the project website at: <https://www.vpi.co.uk/news-press/>
- The Applicant will publish the Regulation 6 notice for two consecutive weeks in the Grimsby Telegraph and Scunthorpe Telegraph. The notice will provide details of where the Application documents can be inspected, how to submit comments and the deadline for doing so. The notice will be published in the following publications on the following dates (these are appropriate to give notice of the application in a local newspaper and to ensure notice of the application is provided in the vicinity of the land in any other publication, pursuant to Regulation 6(1)(a) and (b)):
 - Grimsby Telegraph: 6th and 13st March 2025.
 - Scunthorpe Telegraph: 6th and 13st March 2025.
- A letter will be sent to the relevant consultees (accompanied by the Regulation 6 Notice) providing information on the Application, details of where the Application documents can be inspected, how to submit comments and the deadline for doing so.

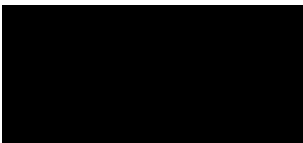
A copy of the Regulation 6 Notice forms part of the Application.

Compliance with Regulation 4(2)

A checklist setting out how the Application complies with Regulation 4(2) of the 2011 Regulations is provided as **Attachment 1** to this letter.

We would be grateful if you could acknowledge receipt of the Application. If you wish to discuss the approach or any other matter relating the proposed change ahead of its submission, please do not hesitate to contact me using the details below.

Yours sincerely,



Director

@dwdllp.com

Enc:

NMC Application Documents

Appendix 1 – Plan showing NMC areas

Attachment 1 – Regulation 4(2) Checklist

Appendix 1: Plan showing additional NMC areas

