FIVE ESTUARIES OFFSHORE WIND FARM

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10.18 REPORT ON PROPOSED CHANGES

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1 SUMMARY

1.1 **OVERVIEW**

- 1.1.1 This Change Request follows on from 10.7 Notification of Intention to Submit a Change Request letter [PD4-009] submitted to the Examining Authority (ExA) on 9 September 2024. That Notification identified a programme for the Change Request, with it being submitted at Deadline 1. No comments or suggested changes to the programme were made at the Preliminary Meeting or included within the ExA's Rule 8 Notification of timetable for the examination [PD-009] issued on 25 September 2024.
- 1.1.2 In accordance with the guidance provided in the Planning Inspectorate's Advice Note 'Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted' (August 2024) this) Report on Proposed Changes addresses the requirements in the Advice Note relating to 'Step 4' of the process for requesting a change to an accepted application.
- 1.1.3 The change request has been prepared primarily in response to engagement with landowners and other key stakeholders. It is also intended to implement changes that the Applicant has identified through design work, and addresses some minor mapping errors.
- 1.1.4 The changes include alterations to the onshore export cable corridor route and the LBBG Compensation Area, which change the Order Limits, and result in changes in the land subject to compulsory acquisition.
- 1.1.5 This report sets out document reference 10.18 includes:
 - > Details of each change in Section 2
 - > Consideration of the environmental impact of the changes in Section 3;
 - > The Applicant's approach to consultation in Section 4;
 - > Section 5 sets out the next steps and expected timings;
 - > Section 6 sets out matters relating to compulsory acquisitions.



2 SUMMARY OF CHANGES

2.1 **OVERVIEW**

2.1.1 The Applicant has summarised the proposed changes below. A full set of plans showing the locations of the proposed changes within the Order Limits is included with this Change Request 10.18.1 Figures for Report of Proposed Changes. These figures show the proposed additions and removals from the Order Limits and are submitted to assist with providing context for the changes described below and reflected in the DCO Plans (also enclosed with the Applicant's change request) which are listed in Annex A.

2.2 CHANGE 1: REDUCTION IN OFFSHORE ARRAY BOUNDARY

- 2.2.1 Two minor changes are proposed to the extent of the Offshore Order Limits (Works No.1 Array Area and Works No. 2 Offshore Export Cable Corridor) to remove overlap between the Five Estuaries Offshore Wind Farm The Crown Estate (TCE) Lease Area and the Galloper Offshore Wind Farm TCE Lease Area.
- 2.2.2 This change is being made following discussions with TCE and requires no further consultation.
- 2.2.3 As set out in Section 3, this change has no impact on the assessments.. The offshore co-ordinates schedule in the change request dDCO Rev C has been updated along with 2.7 Offshore Order Limits and Grid Coordinates Plan -Rev B. As this change is imperceptible on the scale of the offshore plans no other plans have been updated and provided with the Change Request.

2.3 CHANGE 2: CHANGE TO MEAN HIGH WATER SPRINGS (MHWS)

- 2.3.1 Ordnance Survey (OS) periodically update the Mean Low and Mean High water line. An OS update to the Mean Low and Mean High water line was introduced following submission of the Applicant's DCO application.
- 2.3.2 The updates made by the OS affect the extent of Works No. 2A and Works No. 3 on sheets 7 of 7 on the Works Plans Offshore [APP-011] and Works No. 3 on sheets 1 and 2 of 20 on the Works Plans Onshore [APP-010], which would need to be revised.
- 2.3.3 These changes have the effect of altering the areas subject to compulsory acquisition in 01-007, 01-008, 02-001, the creation of a new plot 02-001A and the offshore coordinates. As set out in Section 3, this change has no impact on the assessments...
- 2.3.4 The Applicant has provided updates its onshore plans and the areas of the works and plots which were drawn to align with these boundaries. The offshore co-ordinates schedule in the change request dDCO Rev C has been updated along with 2.7 Offshore Order Limits and Grid Coordinates Plan Rev B. This would have the effect of changing the areas in some plots. (Reduction in size in Plot 01-007; increase in size in Plot 01-008; reduction in size in Plot 02-001.) Therefore affecting the area of some plots subject to compulsory acquisition. It is therefore anticipated at this time that Regulation 4 consultation would be required for this change. Further details of the Applicant's proposals in relation to Regulation 4 consultation are set out in section 5 of this report. These changes to plots have been updated in 2.3 Land Plans Onshore. Revision C and the associated land documents.



2.4 CHANGE 3: MINOR REDUCTIONS TO THE ORDER LIMITS

- 2.4.1 The Applicant has amended the onshore Order Limits to correct minor drawing errors. Two small slivers of land are proposed to be removed from the onshore Order Limits. These are as follows:
 - Sliver of land (approx. 35.0 m x 0.01 m) removed to north east of the substation area in plot 17-025. This land was erroneously included as a result of a drawing error and is not required.
 - Sliver of land (approx. 1.3 m x 0.01 m). removed from Work No. 9F (plot 08-024). This land was erroneously included as a result of a drawing error and is not required.
- 2.4.2 These areas of land have therefore been removed from all the revised onshore DCO land and works plans included with the change request.

2.5 CHANGE 4: MINOR ADDITIONS TO THE ORDER LIMITS FOR OFFROUTE HAUL ROADS

- 2.5.1 The Applicant proposes to amend the Order Limits to widen Works No. 7E, an off route haul road to the south of the railway crossing. This addition (approx. 195 m x 8.8 m) is to provide additional flexibility for reducing interactions and locating any off route haul road in this location as far away as possible from the proposed Thorpe Park Solar Farm, which is proposed in this area. It would also allow the Applicant to minimise the impact on farming activities in the event the solar farm does not proceed. This does not alter where the Applicant is seeking rights to install the export cables.
- 2.5.2 The Applicant proposes to lengthen Works No. 9C an off route haul road to the west of Damant's Farm Lane and adjacent to existing reservoirs. This addition (approx. 200 m x 39 m) provides additional flexibility in minimising the impact of the project on the landowners' farming operations, and their aspirations for future residential development in this area, by allowing for the haul road to be constructed as close to the field edge as possible. This does not alter where the project is seeking rights to install the export cables.
- 2.5.3 These changes would have the effect of increasing the areas subject to compulsory acquisition of plots 05-008 and 07-002 It is therefore anticipated that Regulation 4 consultation would be required for these changes. Further details of the Applicant's proposals in relation to Regulation 4 consultation are set out in section 5 of this report.
- 2.5.4 These changes have been added to all the revised onshore DCO plans included with the change request.



2.6 CHANGE 5: CHANGES TO BENTLEY ROAD ORDER LIMITS

- 2.6.1 The Applicant has reviewed the extent of the Bentley Road / A120 Order Limits Works Nos.13 and 13A) and has amended the Order Limits to make four minor additions of slivers of lands along Bentley road and the associated TCC (Work No. 13) to align Order Limits to OS MasterMap and correct drawing errors. The largest of these additions is approx. 6m x 0.04 m. This change would have the effect of increasing the area subject to compulsory acquisition of plots 14-035, 14-036, 15-002 and 15-010. It is therefore anticipated that Regulation 4 consultation will be required for this change.
- 2.6.2 A small sliver of land (Approx. 46 m x 0.7 m) adjacent to the A120 / Bentley Road junction within Works No. 13A (plot 15-013) has been removed. This land was included erroneously as a result of a drawing error and is not required.
- 2.6.3 These changes have been added to all the revised onshore DCO plans included with the change request.

2.7 CHANGE 6: ADDITIONAL CONSTRUCTION ACCESS

- 2.7.1 A new construction access point has been added to access Works No. 15D to the south of Ardleigh Road by the Applicant to support the construction of the operational drainage connection.
- 2.7.2 This access was not included in the original design and although not specifically covered in the existing Traffic and Transport Assessment, it is covered by the general assessment for traffic accessing the substation and associated works. No additional traffic numbers are proposed. Traffic would turn left from AC-12A or right from AC-12 along Ardleigh road to AC-13.
- 2.7.3 A minor sliver of land (Approx. 8 m x 1.3 m) has been added to the Order Limits at the location of AC-13, where the current Order Limits meet Ardleigh Road. This is to align with OS MasterMap. This addition would also help to facilitate the new construction access.
- 2.7.4 The Traffic & Transport Chapter [REP1-018], the Traffic and Transport Baseline Report [REP1-026] – Part 1, the Onshore Project Description [AS-004] and the Outline Construction Traffic Management Plan [REP1-043] have all been revised to incorporate these changes and submitted as part of the Change Request.
- 2.7.5 This change would have the effect of increasing the areas subject to compulsory acquisition in plot 17-008. It is therefore anticipated that Regulation 4 consultation will be required for these changes. Further details of the Applicant's proposals in relation to Regulation 4 consultation are set out in section 5 of this report.

2.8 CHANGE 7: ADDITIONAL TEMPORARY SPEED REDUCTIONS

- 2.8.1 Following a review by the Applicant and in discussion with Essex County Council (Highways) a number of additional temporary speed restrictions are planned be included as follows:
 - Extending Bentley Road temporary speed restriction to align with existing
 40 mph signage to the north of the existing Order Limits.
 - Including 40 mph speed limit along Golden Lane, which has been identified as required by the Road Safety Audit for that crossing point included within



6.6.8.2 Traffic and Transport Baseline Report – Part 05 – Revision B [REP1-31).

- Including Thorpe Road 40 mph speed limit to extend existing restriction to cover the AC-3A and AC-3B.
- Extending the 40 mph restriction on Clacton Road to cover AC-8A and AC-8B.
- > Including a 30 mph restriction on Ardleigh Road to cover AC-12 and AC-13
- 2.8.2 These amendments have been included on 2.18 Temporary Speed Reduction Plan– Rev Band amendments to the Schedule 4, Part 4 in the dDCO – Rev C
- 2.8.3 Revisions have been made to the Traffic & Transport Chapter [REP1-018], the Traffic and Transport Baseline Report Part 1 [REP1-026] and the Outline Construction Traffic Management Plan [REP1-043] and submitted as part of this Change Request.
- 2.9 CHANGE 8: ADDITIONAL POWERS TO IMPACT TREES WITH EXISTING TREE PRESERVATION ORDERS
- 2.9.1 The powers to impact trees with existing Tree Preservations Orders (TPO) were not included in the dDCO [APP-024]. The TPOs are shown on 2.10 Tree Preservation Order and Hedgerow Plan [APP-015] Sheet 12 of 20.
- 2.9.2 The impact to these trees was included within section 5 of 9.22.1 Arboricultural Report [APP-255].
- 2.9.3 The dDCO [REP1-008] has been updated in Revision C at Article 38 a to include amended wording to authorise works to protected trees and the new part 1 in schedule 12 lists the relevant orders and trees affected.
- 2.10 CHANGE 9: ORDER LIMIT CHANGES TO THE LESSER BLACK BACKED GULL (LBBG) COMPENSATION AREA AT ORFORD NESS
- 2.10.1 Following additional surveys and discussions with landowners and stakeholders it is proposed to amend the extent of the LBBG Compensation Area Works No. 18B shown on sheet 20 of 20 on the Works Plans Onshore [APP-010]. This has been done to ensure that only the land required for implementing the LBBG compensation measure and the associated access are included within the Order Limits.
- 2.10.2 These amendments have removed the following areas from the Order Limits:
 - Norfolk Projects / Scottish Power Renewables LBBG compensation area as it is not considered viable to adjoin the VE LBBG compensation area as this would sever access to parts of Orford Ness and potentially impede ongoing delivery of the compensation measure.
 - > The large shingle bank on the eastern edge of Orford Ness which is not suitable LBBG habitat or practical for installing the predator proof fence.
 - The Applicant has refined the remaining Order Limits to a single compensation area of approximately 6 ha (plus land for access and implementation).



- 2.10.3 This change has required the inclusion of a small area of land immediately adjacent to the current Order Limits and as such these changes may have the effect of creating a new plot subject to compulsory acquisition. It is therefore anticipated that Regulation 4 consultation could be required for these changes. Further details of the Applicant's proposals in relation to Regulation 4 consultation are set out in section 5 of this report.
- 2.11 CHANGE 10: CHANGES TO THE OPERATIONAL ACCESS
- 2.11.1 Following ongoing discussions with landowners the Applicant has amended a number of the Operational accesses connecting to the public highways (Works No.17).
- 2.11.2 The Applicant has removed the operational access connecting Works 10 to the public highway (Swan Road), Works No. 17 previously shown on sheet 9 of 20 on the Works Plans Onshore [APP-010], and replaced it with an adjacent route at the request the landowner. This change has the effect of creating new plots subject to compulsory acquisition. It is therefore anticipated that Regulation 4 consultation will be required for this change. Further details of the Applicant's proposals in relation to Regulation 4 consultation are set out in section 5 of this report.
- 2.11.3 The Applicant has removed the operational access connecting Works 12 to the public highway (Clacton Road), Works No. 17 previously shown on sheets 13 and 14 of 20 on the Works Plans Onshore [APP-010]. There is an established access from Clacton Road within the Order Limits which negates the need for an additional operational access to access and maintain the export cable. This change results in the removal of land plot 13-021 from the Order.
- 2.11.4 The Applicant has removed the operational access connecting different field parcels within Work No. 12 via Work No. 17 shown on sheet 14 of 20 on the Works Plans Onshore [APP-010]. From discussions with the landowner this existing route is not usable and the project would be less impactful moving between the field parcels within the existing Order Limits to maintain the export cables during operation. This change results in the removal of land plots 13-024 and 14-002 from the Order.
- 2.11.5 Following further reviews by the Applicant of the Order Limits, the Applicant has included a minor amendment to the length of the operational access connecting Work No. 11 to the public highway (Colchester Road) viaWork No. 17 shown on sheet 12 of 20 on the Works Plans Onshore [APP-010] to ensure the access reaches the highway boundary (This addition is approx. 3.5 m x 0.01 m). This is a result of a drawing error. This change increases the area subject to compulsory acquisition in plot 12-005. It is therefore anticipated that Regulation 4 consultation will be required for this change.
- 2.11.6 These have been amended within the revised onshore DCO plans and on the plans within the and the Revision C of Onshore Project Description [AS-004].



3 ENVIRONMENTAL IMPACT ASSESSMENT SUMMARY

3.1 OVERVIEW

- 3.1.1 The Applicant highlights that in general, the proposed changes to the Order Limits and project elements changes do not significantly change the purpose, intent or impact of the original application and will have no material effect on the assessments and conclusions of the ES.
- 3.1.2 The maximum design parameters for the project remain within the original Rochdale Envelope described in the ES.
- 3.1.3 The cumulative environmental assessment for the Project would not change from that described in the Environmental Statement.

3.2 EFFECTS ON ASSESSMENTS

OFFSHORE CHANGES

- 3.2.1 The proposed offshore array boundary changes represent a very minor reduction of the array areas. Details of the changes are provided in Section 2.1:
 - > Change 1: Reduction in Offshore Array Boundary
- 3.2.2 It is considered that they will have no effect on assessments or conclusions of the ES, or require the revision of any ES chapters or figures. A short summary across the offshore topics is provided in Table 3.1 below.

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
Benthic & Intertidal Ecology	6.2.5 Benthic and Intertidal Ecology [APP- 074] concluded there would be no significant effects across the range of impacts across all phases of VE, either alone or in combination with other projects.	The very minor reduction in the proposed offshore array boundary does not result in any changes to the impact assessment outcomes for Benthic and Intertidal Ecology.
Commercial Fisheries	6.2.8 Commercial Fisheries [APP-077] concluded that during construction of VE, commercial fisheries will be prevented from fishing where construction activities are taking place. Outside of these areas, fishing will be able to continue.	The minor reduction in the proposed offshore array boundary does not result in any changes to the impact assessment outcomes for commercial fisheries.
	As set out in 6.2.8 Commercial Fisheries [APP-077], potential significant impacts are identified for UK potting, netting and hooked gear fleets during the construction phase, with proposed approaches and commitment to mitigating these impacts set out in 6.2.8 Commercial Fisheries [APP- 077] and 9.16 Outline Fisheries Liaison and Co-existence Plan [APP-247].	

Table 3.1 Summary of potential impacts resulting from offshore Order Limit changes

Topic	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
	During the operational phase of Five Estuaries, no significant impacts on fishing fleets are predicted reflecting the assumption that fishing can resume within the Project area.	
Fish & Shellfish Ecology	Within 6.2.6 Fish and Shellfish Ecology [APP-075] the majority of impacts assessed were considered not significant upon fish and shellfish receptors.	The reduction of the array boundary will reduce the fish and shellfish study area. Such a minor reduction in the study area will have no implications on the fish and
	Significant effects were concluded for the potential for temporary increases in suspended sediment concentration and sediment deposition during the construction phase, and a dredge disposal restriction was proposed to mitigate the effects.	shellfish receptors or sites included in the impact assessment and/ or considered for mitigation measures. Therefore, all conclusions made, and mitigation measures proposed within 6.2.6 Fish and Shellfish Ecology [APP-075] remain valid.
	No potential for significant cumulative effects were concluded.	
Infrastructure & Other Marine Users	6.2.12 Infrastructure and Other Marine Users [APP-081] concluded there would be no significant adverse residual either alone or cumulatively from VE on Other Marine Users.	The minor reduction in the proposed offshore array boundary does not alter the significance of any effect assessments for this topic.

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary	
Marine Geology, Oceanography and Physical Processes	An assessment of changes to waves, tides and associated sediment transport processes is presented in 6.2.2 Marine geology, oceanography and physical processes [APP-071]. The assessment was undertaken using numerical modelling and the extent of change to these pathways was found to be modest relative to baseline conditions.	The minor reduction in the proposed offshore array boundary does not alter the significance of any effect assessments for this topic.	
	Associated impacts to identified receptors for this topic (namely the coast, Annex I sand banks and seabed areas within nationally/ internationally important sites) were all found to be minor (adverse) and not significant in EIA terms.		
Marine Mammal Ecology	In 6.2.7 Marine Mammal Ecology [APP- 076] significant effects were not concluded for permanent threshold shift (PTS) and disturbance from other construction activities during the construction phase.	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on marine mammal receptors.	

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
	No potential for significant cumulative effects were concluded. The reduction of the array boundary will reduce the VE marine mammal study area. Such a minor reduction in the study area will have no implications on the marine mammals receptors or sites included in the impact assessment and/or considered for mitigation measures.	
Marine Water Sediment Quality	6.2.3 Marine Water Sediment Quality [APP-072] concluded no significant effects alone, or in combination throughout all phases of VE.	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on MWSQ receptors.
	The reduction of the array boundary will reduce the MW&SQ study area. Such a minor reduction in the study area will have no implications on the MW&SQ receptors or sites included in the impact assessment and/or considered for mitigation measures.	
Military & Civil Aviation	 6.2.13 Military and Civil Aviation [APP-079] concluded that there could be significant effects from the following impacts: > Impact 3: Wind turbines causing interference on civil and military radar systems 	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on military and civil aviation receptors.

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
	 Impact 6: Wind turbines causing interference on civil and military radar systems. 	
	 Impact 7: Potential impact to Kent International Airport 	
	However, following the implementation of mitigation measures it is predicted there will be no significant residual effects.	
Offshore Archaeology and Cultural Heritage	6.2.11 Offshore Archaeology and Cultural Heritage [APP-080] concluded no significant effects upon offshore archaeological and cultural heritage receptors.	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on offshore archaeological and cultural heritage receptors.
	The reduction of the Array boundary will reduce the marine archaeology study area. However, these changes are very minor and unlikely to impact the number of sites or records assessed and included in the impact assessment and/or considered for mitigation measures (such as AEZs).	

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
Offshore Ornithology	 6.2.4 Offshore Ornithology [APP-073] provided an assessment of the potential impacts associated with VE on offshore ornithological receptors. Impacts assessed for the construction phase resulted in either negligible or minor adverse effects and are therefore not significant. Impacts assessed for the operational phase resulted in either negligible or minor adverse effects and are therefore not significant. Direct and indirect impacts identified for the decommissioning phase were determined to be negligible and therefore not significant. A cumulative assessment of impacts resulted in minor adverse effects and are therefore not significant. 	The minor changes to the offshore array boundary would not make any material difference to estimated species' abundance or predicted impacts on ornithological receptors during construction, operation or decommissioning. The conclusions of the assessment would therefore be unchanged.
Shipping & Navigation	6.2.9 Shipping and Navigation [APP-078] concludes that all potential impacts throughout all phases of VE will be "broadly acceptable" or "tolerable with mitigation."	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on Shipping and Navigation receptors.

Торіс	Summary of assessment and Impacts at ES	Any changes in impacts because of the reduction in offshore array boundary
Seascape, Landscape and Visual	6.2.10 Seascape, Landscape and Visual [APP-079] concludes that there will be no significant adverse effects, either alone or cumulatively across all impacts, viewpoints and phases of VE.	On the basis of the minor changes to the offshore array boundary there is no potential for a change in the anticipated impacts on Seascape, landscape and visual receptors.



ONSHORE CHANGES

- 3.2.3 The following onshore changes, as outlined in Section 2, are within areas covered by existing datasets and surveyed areas:
 - > Change 2: Change to Mean High Water Springs (MHWS)
 - > Change 3: Minor Reductions to the Order Limits
 - > Change 4: Minor Additions to the Order Limits for Off route Haul Roads
 - > Change 5: Changes to Bentley Road Order Limits
 - > Change 6: Additional Construction Access
 - > Change 7: Additional Temporary Speed Reductions Added
 - Change 8: Additional Powers to Impact Trees with Existing Tree Preservation Orders Added
 - > Change 10: Changes to the Operational Access.
- 3.2.4 The proposed minor changes to the Order Limits, listed above, are not considered to have any effect on assessments or conclusions of the ES or require the revision of any ES chapters or figures. A summary of the assessment findings and implications of the change request is provided in Table 3.2 below.

Торіс	Summary of assessment and Impacts at ES	Implication of Change Requests 2, 3, 4, 5, 6, 7, 8, &10
Air Quality	residual impacts in relation to air quality have	The minor changes to the Order Limits boundary will not result in any changes to the conclusions contained in the ES Chapter.
	protected species and habitats.	Therefore, all the conclusions made, and mitigation measures proposed within 6.3.10 Air Quality [APP-092] remain valid.
Climate Change	6.4.1 Climate Change [APP-093] concluded that the operational phase of VE would enable the use of renewable electricity which would result in a positive greenhouse gas impact, resulting in a significant beneficial effect.	The minor changes to the Order Limits boundary will not result in any changes to the findings and impacts contained in 6.4.1 Climate Change [APP-093], nor 6.4.1.1. Greenhouse Gas Assessment [APP-094].
	There are no adverse impacts in relation to Greenhouse Gas Emissions.	
Onshore Biodiversity and	There are no adverse impacts in relation to Environmental and biodiversity net gain.	The minor changes to the Order Limit Boundary will not result in any changes in the impact assessment
Nature Conservation	relation to SSSIs	outcomes for Onshore Biodiversity and Nature Conservation. Therefore, all the conclusions made, and mitigation measures proposed within 6.3.4
	No adverse impacts have been identified in relation to regional and local sites.	Onshore Biodiversity and Nature Conservation [APP- 086] remain valid.
	No residual impacts in relation to Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats have been identified.	•
	No residual impacts in relation to protection and enhancement of onshore or offshore habitats and	

Table 3.2 Summary of potential impacts resulting from onshore Order Limit changes

Торіс	Summary of assessment and Impacts at ES	Implication of Change Requests 2, 3, 4, 5, 6, 7, 8, &10
	species have been identified in a majority of cases.	
	The adverse impact on the Alde-Ore Estuary SPA and Alde-Ore Estuary Ramsar Lesser Black Backed Gulls (LBBG) requires compensation in the form of a suitable compensation area, at Orford Ness	
Visual Impact AssessmentAssessment [APP-084] predicted that there will be some significant effects upon landscape receptors, but these will be localised and will gradually reduce as mitigation measures such as planting become established.Bo as asTh me and	The proposed minor changes in the Order Limit Boundary will not result in any changes in the impact assessment outcomes for the Onshore Landscape and Visual Impact Assessment.	
	Therefore, all the conclusions made, and mitigation measures proposed within 6.3.2 Onshore Landscape and Visual Impact Assessment [APP-084] remain valid.	
Socioeconomics, Tourism and Recreation	In the short term, there are potential limited- duration adverse effects predicted for the local tourism economy which are associated with the construction phase, and which reduce following	The minor changes in the Order Limit Boundary will not result in any changes in the impact assessment outcomes for Socioeconomics Tourism and Recreation.
No re	completion of construction. No residual impacts in relation to Socio- Economic Impacts have been identified.	Therefore, all the conclusions made, and mitigation measures proposed within 6.3.3 Socioeconomics Tourism and Recreation [APP-085] remain valid.
	With the implementation of mitigation measures set out within the ES chapters and supplementary documentation, the EqIA concludes that the VE would not have a differential or disproportionate impact on people	Additionally, the changes to the order Limits would have no effect on the conclusions of 9.11 Equality Impact Assessment [APP-241].

Торіс	Summary of assessment and Impacts at ES	Implication of Change Requests 2, 3, 4, 5, 6, 7, 8, &10
	with protected characteristics, differently to the general population.	
Ground Conditions and Land Use	The Minerals Resource Assessment [APP-235] considered the potential for the sterilisation of sand and gravel with the DCO Limits. The Minerals Resource Assessment concluded that the due to the temporary nature of the Project, mineral would not be permanently sterilised.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts contained in 9.5 Mineral Resource Assessment [APP- 235] Report, nor 6.3.5 Ground Conditions and Land Use [APP-087] as the changes will have no material impact on ground conditions.
Hydrology and Flood Risk	6.3.6 Hydrogeology and Flood Risk [APP-088] concluded that no residual impacts in relation to Flood Risk have been identified.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts contained in 6.3.6 Hydrology, Hydrogeology and Flood
	No residual impacts in relation to Water Quality and Resources have been identified.	Risk [APP-088].
	The reduction in the Order Limits Boundary will have no implication on the receptors included in the impact assessment and/or considered for mitigation measures.	
Traffic and Transport	No residual impacts in relation to Traffic and Transport have been identified.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts
	The reduction in the Order Limits Boundary will have no implication on the receptors included in the impact assessment and/or considered for mitigation measures.	contained in 6.3. 8 Traffic and Transport – Revision B [REP1-018]. However, to provide further information to support the change request, the Traffic & Transport documents listed in Annex A have been updated to include the new speed reductions and access point.
Noise and Vibration	No residual impacts in relation to noise and vibration.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts

Торіс	Summary of assessment and Impacts at ES	Implication of Change Requests 2, 3, 4, 5, 6, 7, 8, &10
	The reduction in the Order Limits Boundary will have no implication on the receptors included in the impact assessment and/or considered for mitigation measures.	contained in 6.3.9 Airborne Noise and Vibration [APP-091].
Public Health	In relation to adverse impacts to health, the conclusion of the assessment for population health is that impacts would be minor, short term and related to construction.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts contained in 6.4.2 Human Health and Major Disasters [APP-095].
	No residual impacts in relation to health and major disasters, following the implementation of mitigation.	
	The reduction in the Order Limits Boundary will have no implication on the receptors included in the impact assessment and/or considered for mitigation measures.	
Onshore Archaeology and Cultural Heritage	No residual impacts in relation to the Historic Environment have been identified.	The minor changes in the Order Limit Boundary will not result in any changes to the findings and impacts contained in 6.3.7 Archaeology and Cultural Heritage [APP-089].



ORFORD NESS LESSER BLACK BACKED GULL COMPENSATION AREA

- 3.2.5 The boundary changes proposed for a LBBG compensation site at Orford Ness, will be assessed through ongoing and planned surveys of vegetation and invertebrates, alongside the ecological walkover survey already undertaken. Details of the changes are provided in Section 2.10:
 - > Change 9: Order Limit Changes to the Lesser Black Backed Gull Compensation Area at Orford Ness.
- 3.2.6 Several documents have been updated to provide information in support of the change request (see Annex A). Final survey results will be incorporated into a further update of these documents in due course, anticipated to be at or before Deadline 4.

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area
Air Quality	6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] concluded that no significant impacts in relation to air quality have been identified in relation to health or on protected species and habitats.	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any changes to the conclusions contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225].
		Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted.
Climate Change	6.4.1 Climate Change [APP-093] concluded that the operational phase of VE would enable the use of renewable electricity which would result in a positive greenhouse gas impact, resulting in a significant beneficial effect.The site is not subject to impact from future climate	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any changes to the conclusions contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225].
	change related sea level rise as it is protected by a large (~10m high) shingle bank.	However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull

Table 3.3 Changes in the Order Limit Boundary for the Orford Ness Lesser Black Backed Gull Compensation Area

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area	
	There are no adverse impacts in relation to Greenhouse Gas Emissions.	Compensatory Areas Environmental Impact Assessment – Revision B has been submitted.	
Onshore Biodiversity and Nature Conservation	6.8.1.3 Lesser Black Backed Gull Ecological Impact Assessment [APP-228] concluded that with the mitigation proposed, principally within the 5.5.6 Lesser Black Backed Gull Implementation and Monitoring Plans [APP-052] until the fence is removed, the proposed compensation site would not have an adverse effect on the integrity of the Alde-Ore Estuary SSSI whether individually or in combination with other developments.	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any changes in the Ecological Impact Assessment. Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1.3 Lesser Black Backed Gull Ecological Impact Assessment [APP-228] and , 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.	
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted, along with supporting documents (see Annex A). In addition, full survey results will be incorporated into a future update of the relevant documents.	
Landscape and Visual Impact Assessment	6.8.1.2 Lesser Black Backed Gull Landscape and Visual Assessment [APP-228] predicted that the effect on landscape character would be moderate- minor and not significant in a very localised area, and either minor or not significant with no effect across the much wider extent of the landscape receptors (the Coastal Dunes and Shingle Ridges	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any changes in the impact assessment outcomes for the LBBG Landscape and Visual Assessment.	

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area
	LCT, Coastal Levels LCT, Suffolk Coast and Heath AONB, and the Suffolk Heritage Coast). While it is recognised that the predator proof fencing will have a localised effect owing to the increase in the extent of fencing in an area of open grassland, these effects will be moderated by the relatively small scale and contained extent of the predator proof fencing and the human influences which have already notably altered this landscape. The effects on landscape character and visual amenity will be not significant.	Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1.2 Lesser Black Backed Gull Landscape and Visual Assessment [APP-228] remain valid. However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted, along with supporting documents (see Annex A).
Socioeconomics Tourism and Recreation	The proposed LBBG compensation site is in an area remote from population centres and areas of high tourist interest. Due to the remote location and small scale nature of the proposed development, no potential for significant socioeconomic or tourism effects are predicted.	The changes to the Order Limits boundary for the Orford Ness LBBG compensation area will not result in any significant changes to the findings and impacts contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225].
		Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment - Revision B has been submitted.

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area	
Ground Conditions and Land Use	6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] confirmed that ground contamination effects are not considered further for project alone assessment as	Compensation Area will not result in any significant changes to ground conditions and land use.	
	there is no potential for significant effects to arise as a result of the proposed development, with the proposed controls in place.		
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted.	
Flood Risk	6.8.8.1Lesser Black Backed Gull Flood Risk Assessment [APP-226] concluded that the perceived level of flood risk to and caused by the development proposals is low and the development would be safe, without significantly increasing flood risk elsewhere over its lifetime.	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any significant changes to the findings and impacts contained in 6.8.8.1Lesser Black Backed Gull Flood Risk Assessment [APP-226].	
		Therefore, all the conclusions made, and mitigation measures proposed within 6.8.8.1Lesser Black Backed Gull Flood Risk Assessment [APP-226] and 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.	

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted, along with supporting documents (see Annex A).
Traffic and Transport	6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] confirmed that a small number of vehicle movements will arise during the construction of the fence as a result of materials, plant and equipment deliveries and staff travelling to site. Following the construction of the fence, vehicle movements will be limited to those bringing staff to undertake maintenance and monitoring visits. Effects due to traffic and transport are concluded to be not significant.	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any significant changes to the findings and impacts contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP- 225]. Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted
Noise and Vibration	No significant effects related to noise and human or ecological receptors were identified in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225].	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any significant changes to the findings and impacts contained in 6.8.1 Lesser Black Backed Gull Compensatory

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Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area
		Areas Environmental Impact Assessment [APP- 225]. Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid. However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted
Public Health	In relation to adverse impacts to health, the conclusion of the assessment for human health is that impacts would be minor, short term and related to construction. There are no human receptors within range of the impacts of the proposed works. No residual impacts in relation to health and major disasters, following the implementation of mitigation. The reduction in the Order Limits Boundary will have no implication on the receptors included in the impact assessment and/or considered for mitigation measures.	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any significant changes to the findings and impacts contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP- 225]. Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid. However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted

Торіс	Summary of assessment and Impacts at ES	Implication of Change Request 9 at Orford Ness Lesser Black Backed Gull Compensation Area
Onshore Archaeology and Cultural Heritage	On the basis of the baseline environment and project description, no significant archaeology and cultural heritage impacts have been identified in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP- 225].	The changes to the Order Limits boundary for the Orford Ness Lesser Black Backed Gull Compensation Area will not result in any significant changes to the findings and impacts contained in 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP- 225]. Therefore, all the conclusions made, and mitigation measures proposed within 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] remain valid.
		However, to provide further information to support the change request, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment – Revision B has been submitted



4 **CONSULTATION**

- 4.1.1 Applicants are recommended to consider whether consultation is required to enable affected persons to make representations on the changes to the application. The changes proposed have arisen following consultation on the DCO application and having regard to the feedback from stakeholders, a number of minor drawing errors have also been included. The Applicant therefore considers that consultation on the proposed changes in advance of submission is unnecessary as the changes requested are a result of the responses provided to previous consultation and subsequent engagement with Interested Parties.
- 4.1.2 The changes proposed do not result in any changes to the ES which require the production of Supplementary Environmental Information. A number of minor changes to the ES would be required but can be addressed as errata as they have no impact on the overall assessment or conclusions reached. For example, the amendment of MHWS and MLWS and the 'slivers' on the red line boundary change plans but do not alter the assessment or its conclusions.
- 4.1.3 In the case of proposed change 9: Order Limit Changes to the Lesser Black Backed Gull Compensation Area at Orford Ness, 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment [APP-225] will be updated to take into account data acquired from the ongoing surveys, however it is not expected that the conclusions of the assessment will change as a result of the amendments to Order Limits.
- 4.1.4 With regard to the change at Orford Ness LBBG compensatory area (Change 9), Natural England, National Trust and Cobra Mist have been engaged with subsequent to the ES submission in March 2024 and following receipt of Relevant Representations in June and August 2024. In addition, the proposed change has been presented to Suffolk County Council and East Suffolk District Council. A summary of recent stakeholder feedback is provided below (an update will also be provided at Deadline 2 in an update to 5.5.3 Lesser Black Backed Gull Compensation - Evidence, Site Selection and Roadmap [APP-049]:
 - > Natural England Bilateral meetings
 - Agree that a refined 6ha area is preferrable to the larger search area presented at Application;
 - Agree with survey scopes and methodologies to address gaps in survey data at ES.;
 - Agree that the location is suitable for the purposes of the proposed measure; and
 - The Applicant will provide interim survey reports when available and update
 6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental
 Impact Assessment [APP-225] with survey findings.
 - > National Trust Bilateral meetings
 - > Agree that a refined 6ha area is preferrable to the larger search area presented at Application and respect the choice of location outside of National Trust land.



- > Cobra Mist Bilateral meeting
 - > Agree that a refined 6ha area is preferrable to the larger search area presented at Application and is also preferably located on Cobra Mist land only (no longer encompassing National Trust land);
 - Agree that the location is suitable for the purposes of the proposed measure; and
 - > Agree that access for construction and maintenance is achievable with minimal impact on surrounding areas and operations, and will support the Applicant as appropriate to facilitate this.



5 NEXT STEPS

- 5.1.1 The Applicant acknowledges that the acceptance of any proposed change is ultimately a decision for the ExA. The Applicant sets out the potential programme for the next steps, assuming the need to engage Regulation 4 consultation:
 - ExA has 28 days to decide whether to accept: decision by 8 November 2024. An early decision (e.g. within two weeks) would however be much appreciated, which may allow the remaining timetable set out below to be accelerated (and allow the consultation to close before the peak Christmas leave period begins, which the Applicant suggests would be helpful for respondents and Planning Inspectorate staff receiving relevant representation responses that need to be published);
 - If accepted, Applicant would carry out a 6-week consultation closing the week commencing 16 December 2024 (assuming newspaper publication dates can be made for week commencing 11 November 2024) on changes which required Regulation 4 consultation, consultation would run until 20 December (to allow for two consecutive weeks of newspaper notices as required by the Infrastructure Planning (Compulsory Acquisition) Regulations 2010);
 - A consultation report will be prepared and submitted no later than 10 January 2025 (Deadline 5), and
 - Issues could be raised by Interested Parties on the changes in hearings programmed for week commencing 20 January 2025.



6 COMPULSORY ACQUISITION MATTERS

6.1 FUNDING

- 6.1.1 In accordance with the advice contained in the Planning Inspectorate advice note, the documents submitted with the change request include updated Land Plans Onshore (document 2.3 Revision C), Book of Reference (document 4.1 Revision C), Statement of Reasons (document 4.3 Revision C) and Land Rights Tracker (document 10.2 Revision C).
- 6.1.2 The proposed changes do not have any material implications for the 4.2 Funding Statement [APP-029] and the Applicant confirms that funding would be available for any additional compensation for compulsory acquisition or temporary possession resulting from the changes. The Applicant's proposals for meeting the procedural obligations under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 are set out in Section 5 above.

7 ANNEX A – CHANGES TO CURRENT APPLICATION DOCUMENTS

7.1.1 The proposed changes have resulted in amendments to a number of the current application documents as set out in Table 7.1 below.

Table 7.1 Changes to Current Application Documents

Document Title	Pre-Chan	ge Request	Change R	Request	
	Revision	Examination Library Reference	Revision	Tracked and Clean?	Comments
1.3 Guide to the Application	D	REP1-003	E	Tracked & Clean	Updated in line with documents submitted as part of the Change Request.
2.1 DCO Location Plan - Onshore	A	APP-006	В	Clean only	Updated to provide information and support the change request.
2.2 DCO Location Plan - Offshore	A	APP-007	В	Clean only	Updated to provide information and support the change request.
2.3 Land Plans - Onshore	В	REP1-005	С	Clean only	Updated to provide information and support the change request.
2.4 Special Category Land Plan	A	APP-009	В	Clean only	Updated to provide information and support the change request.
2.5 Works Plans - Onshore	A	APP-010	В	Clean only	Updated to provide information and support the change request.

Document Title	Pre-Chan	ge Request	Change I	Request	
2.7 Offshore Order Limits and Grid Coordinates Plan	A	APP-012	В	Clean only	Updated to provide information and support the change request.
2.8 Street Works and Access Plan	A	APP-013	В	Clean only	Updated to provide information and support the change request.
2.9 Plan showing temporary closure of Public Rights of Way	В	REP1-007	С	Clean only	Updated to provide information and support the change request.
2.10 Tree Preservation Order and Hedgerow Plan	A	APP-015	В	Clean only	Updated to provide information and support the change request.
2.11 Historic Environment Plan - Onshore	A	APP-016	В	Clean only	Updated to provide information and support the change request.
2.13 Statutory or Non-Statutory Sites and Features of Nature Conservation - Onshore	A	APP-018	В	Clean only	Updated to provide information and support the change request.
2.15 Water Bodies in a River Basin Management Plan	A	APP-020	В	Clean only	Updated to provide information and support the change request.
2.17 Crown Land Plan - Onshore	A	APP-022	В	Clean only	Updated to provide information and support the change request.

Document Title	Pre-Chan	ge Request	Change I	ge Request Clean only Updated to provide information and support the change request. Tracked & Clean Updated in line with and to support the change request. Tracked & Clean Updated in line with and to support the change request. Tracked & Clean Updated in line with and to support the change request.		
2.18 Temporary Speed Reduction Plan	A	APP-023	В	Clean only	information and support	
3.1 Draft Development Consent Order	В	REP1-008 (Clean) REP1-009 (Tracked)	С	Tracked & Clean	support the change	
3.2 Draft Explanatory Memorandum	В	REP1-010 (Clean) REP1-011 (Tracked)	С	Tracked & Clean	Updated in line with and to support the change request.	
4.1 Book of Reference	В	REP1-012 (Clean) REP1-013 (Tracked)	С	Tracked & Clean	Updated to provide information and support the change request.	
4.3 Statement of Reasons	В	REP1-014 (Clean) REP1-015 (Tracked)	С	Tracked & Clean	Updated to provide information and support the change request.	
5.4.5 Lesser Black Backed Gull Habitats Regulations Assessment	A	APP-045	В	Tracked & Clean	Update to provide information and support the change request including interim survey findings. A final document will be provided to incorporate all survey findings once available at a future submission.	
6.3.1 Onshore Project Description	В	AS-004	С	Tracked & Clean	Updated to provide information and support the change request	

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Document Title	Pre-Change Request		Change Request		
6.3.8 Traffic and Transport chapter	В	REP1-018 (Clean) REP1-019 (Tracked)	С	Tracked & Clean	Updated to provide information and support the change request
6.6.8.1 Traffic and Transport Baseline Report – Part 1	В	REP1-026 (Clean) REP1-027 (Tracked)		Tracked & Clean	Updated to provide information and support the change request
6.8.1 Lesser Black Backed Gull Compensatory Areas Environmental Impact Assessment	A	APP-225	В	Tracked & Clean	Update to provide information and support the change request including interim survey findings. A final document will be provided to incorporate all survey findings once available at a future submission.
6.8.1.1 Lesser Black Backed Gull Flood Risk Assessment	A	APP-226	В	Tracked & Clean	Updated to provide information and support the change request
6.8.1.2 Lesser Black Backed Gull Landscape and Visual Impact Assessment	A	APP-227	В	Tracked & Clean	Updated to provide information and support the change request
6.8.1.3 Lesser Black Backed Gull Ecological Impact Assessment	A	APP-228	В	Tracked & Clean	Update to provide information and support the change request including interim survey findings. A final document will be provided to

Document Title	Pre-Change Request		Change Request		
					incorporate all survey findings once available at a future submission.
9.24 Outline Construction Traffic Management Plan	В	REP1-043 (Clean) REP1-044	С	Tracked & Clean	Updated to provide information and support the change request
10.2 Land Rights Trackers	В	REP1-047 (Clean) REP1-048 (Tracked)	С	Tracked & Clean	Updated to identify new or changed plots as a result of the change
10.18 Report of Proposed Changes	N/a	N/a	A	Clean only	Provides an overview of the propose changes
10.18.1 Figures for Report of Proposed Changes	N/a	N/a	A	Clean only	Provides spatial context for the changes to the order limits



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