



CHANGE REQUEST AND CONSULTATION REPORT: 9.6

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

October 2024

Revision A

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1. INTRODUCTION

1.1. PURPOSE OF THIS REPORT

- 1.1.1. This document has been prepared to accompany a Change Request to the Application for the Cory Decarbonisation Project.
- 1.1.2. The Cory Decarbonisation Project is a proposed development comprising construction, operation, maintenance and decommissioning of the “Proposed Scheme”, incorporating the following main components:
- a Carbon Capture Facility, comprising up to two plants; a proposed new Jetty, extending into the Thames to facilitate the onward transfer of the captured CO₂;
 - the Mitigation and Enhancement Area, designed both to enhance biodiversity and to improve public access to outdoor space;
 - three temporary construction compounds; and connections to utilities and provision of site access works.
- 1.1.3. The Proposed Scheme is being promoted by Cory Environmental Holdings Limited (“CEHL”) (the “Applicant”).
- 1.1.4. On 18 April 2024 the Planning Inspectorate, on behalf of the Secretary of State for Energy Security and Net Zero (“the Secretary of State”), accepted the Application for a Development Consent Order (“DCO”) for the Proposed Scheme (allocated reference no. EN010128) submitted by the Applicant in March 2024.
- 1.1.5. The Applicant has, since the acceptance of the Application, been working with Viking CCS, (the CCS storage partner) to further develop its understanding for usage of the Proposed Jetty.
- 1.1.6. This work has led to the Applicant considering that the Proposed Jetty, and associated dredging, should now be designed to facilitate a maximum vessel size of approximately 20,000m³, rather than the 15,000m³ previously considered in the Application documentation (the ‘Change’).
- 1.1.7. In accordance with the recommended procedure in the Planning Inspectorate’s Advice Page: ‘Nationally Significant Infrastructure Projects: Changes to an Application after it has been accepted for examination’ (August 2024)¹ (“the Advice Page”), on 15 August 2024 the Applicant submitted a project update and Notification of Intention to Submit a Change Request (“NISCR”) (**AS-001**) and on 11 September, the Examining Authority (“ExA”) published its response letter (**PD-004**).

¹ [Nationally Significant Infrastructure Projects: Changes to an Application after it has been accepted for examination - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Nationally_Significant_Infrastructure_Projects_Changes_to_an_Application_after_it_has_been_accepted_for_examination_-_GOV.UK_(www.gov.uk).pdf).

1.1.8. This report provides the information required by Step 4 of the Advice Page and the information requested in the ExA's response letter (**PD-004**) or signposts where this information is provided in other documents.

1.2. STRUCTURE OF THIS REPORT

1.2.1. The remainder of this document is structured as follows:

- Section 2: Description of Change and Reasons for the Change;
- Section 3: Advice Context for the Change Request;
- Section 4: Supporting Environmental Information;
- Section 5: Report on Consultation undertaken;
- Section 6: Schedule of Revised Application Documents; and
- Section 7: Summary and Conclusion.

1.2.2. The Appendices that are referred to in this report, are found in the Change Request and Consultation Report Appendix Document which accompanies this Change Request. The Appendices comprises the following:

- Appendix A: Coastal Modelling;
- Appendix B: Notices sent to Section 42(1)(a)-(d) Parties;
- Appendix C: Full list of organisations;
- Appendix D: New Shopper Notice;
- Appendix E: The Guardian Notice;
- Appendix F: Fishing News;
- Appendix G: London Gazette;
- Appendix H: Lloyd's List;
- Appendix I: Notice Locations Map;
- Appendix J: Website;
- Appendix K: Consultation Responses; and
- Appendix L: Copies of Response Received.

2. DESCRIPTION OF CHANGE AND REASONS FOR THE CHANGE

2.1. DESCRIPTION OF CHANGE AND REASONS FOR CHANGE

- 2.1.1. The Proposed Scheme is a carbon capture scheme with associated jetty, a technology which is explicitly supported by the Energy National Policy Statements and identified as critical national priority infrastructure.
- 2.1.2. Section 3 of NPS EN-1 sets out the need for carbon capture infrastructure; in particular, paragraphs 3.5.1 and 3.5.2 recognise the ‘*urgent need*’ for the technology and that the Committee on Climate Change states that ‘*CCS is a necessity not an option*’, paragraph 3.5.7 refers to the Government’s investor and supply chain roadmaps to ensuring a carbon capture sector is investible, cost effective and focused on delivery.
- 2.1.3. Building on this, the (former) Government in December 2023 released its CCS Vision, recognising the evolving nature of Non-Pipeline Transport as part of the carbon capture network. In Spring 2024, consultation on the economic models for Non-Pipeline Transport was undertaken, again recognising it as a developing part of the sector that should be supported.
- 2.1.4. The Proposed Scheme is one of the first projects in the UK looking to facilitate Non-Pipeline Transport as part of its CCS cycle, and in the above context, the Applicant has, since the submission of the Application, been working with Viking CCS (the CCS storage provider) to continue to develop its understanding of the best way of taking forward the usage of the Proposed Jetty, not least to ensure its usage best achieves the aims of Government in bringing forward Non-Pipeline Transport as part of the CCS sector.
- 2.1.5. This work has led to the Applicant considering that the Proposed Jetty, and associated dredging, should now be designed to facilitate a maximum vessel size of approximately 20,000m³, rather than the maximum 15,000m³ previously considered in the Application documentation.
- 2.1.6. Such a change will enable a decrease in the number of marine vessel movements which would:
- facilitate more economically efficient operation (aligned with Government objectives) due to less fuel consumption, port fees and capital costs. This is in line with NPS EN-1 paragraph 4.9.6 which states that “*The barriers to CCS deployment to date have been commercial rather than technical, and the business models, which may evolve over time, aim to support the deployment of the technology*”;

- allow for faster CO₂ unloading rate when it reaches its destination terminal, which will be beneficial to the CCS sector as a whole given the other potential users that would be using the Immingham Green Energy Terminal with Viking taking it forward - making the CCS sector more attractive to potential adopters and contributing to the Government's ambitions for CCS in the UK; and
- would allow for lower carbon intensity of the transport movements associated with the Proposed Scheme, contributing to the overall sustainable nature of this development, in line with paragraph 2.6.1 of NPS EN-1.

2.1.7. Articles 2, 13, and Schedule 16 of the **draft DCO (AS-014)** and the limits of deviation shown on Work No. 4 the **Works Plans (AS-007)** set out the maximum parameters for the Proposed Jetty. Facilitating vessels of approximately 20,000m³ would result in the following changes to these parameters:

- the downwards limits of deviation for dredging set out in article 2 of the draft DCO need to be increased from minus 10.50 chart datum to minus 11.00 chart datum to account for small tweaks in jetty design;
- there is an increase in the number of breasting dolphins from 2 to 4 in Schedule 16; and
- the slight reduction of the limits of deviation for Work No. 4B shown on the Works Plans.

2.1.8. The Change will also facilitate a change to navigational risk given the size and number of vessel movements will be changed, necessitating an update to the **Preliminary Navigational Risk Assessment ('pNRA') (AS-023)**. A clean and tracked changed version of the pNRA accompanies this change request report. It is the result of this pNRA process that enables a reduction in the limits of deviation in the Works Plans (noting that the Applicant's **NISCR (APP-001)** had suggested that the Works Plans would not need to change).

2.1.9. As a result of the change to the limits of deviation for Work No. 4B the **Land Plans (AS-006)** will also need to be updated to change the size of plot 02-004 to match.

2.1.10. As noted in the Applicant's Notification of the proposed Change Request, the Change would also lead to the following changes that, although not a secured parameter, need to be considered from an assessment perspective:

- an increase in assumed capital dredging volume by approximately 40,000 m³; and
- a likely increase of the size of the sheet pile retaining wall either side of the dredge pocked by a combined approximately 70m.

3. ADVICE CONTEXT FOR THE CHANGE REQUEST

3.1. PLANNING ACT 2008: EXAMINATION STAGE FOR NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS (PINS, APRIL 2024)²

- 3.1.1. The Applicant has had regard to the Guidance published by Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities “*Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*” as it relates to the Change Request.
- 3.1.2. The Guidance states that “...*there are occasions when applicants may wish to make changes to an application after it has been accepted for examination, but this should not be the routine practice.*”
- 3.1.3. The Guidance goes onto say that “*In deciding whether to accept an applicant’s proposed changes to an application, the Examining Authority will need to consider a number of factors such as whether:*
- *the changes would mean the project is effectively a different one from that contained in the application;*
 - *the application (as changed) is still of a sufficient standard for examination;*
 - *sufficient consultation on the changed application can be undertaken to allow for the examination to be completed within the statutory timetable;*
 - *the changes would breach the principles of fairness and reasonableness for parties participating in the examination; and*
 - *any other procedural requirements can still be met.” (Paragraph 018 Reference ID 07-018-20240430).*
- 3.1.4. **Table 3-1** considers the application of these factors to this Change Request.

Table 3-1 – Considering the acceptability of the Change Request

Factor	How the factor applies to the Change
<i>The changes would mean the project is effectively a different one from that contained in the application.</i>	The Applicant considers that none of the changes required to the Application documentation stated in Section 2 would mean that, if the Change was accepted, the Proposed Scheme would effectively be a different project from that which was submitted. The Proposed Scheme remains a Carbon Capture Facility with a Proposed Jetty to allow the export of the liquified carbon. The Change Request makes a small modification to the way that the latter activity will happen.

² [Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects - GOV.UK \(www.gov.uk\).](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91111/Planning_Act_2008_-_Examination_stage_for_nationally_significant_infrastructure_projects.pdf)

Factor	How the factor applies to the Change
<p><i>The application (as changed) is still of a sufficient standard for examination.</i></p>	<p>The Applicant has had regard to the Planning Inspectorate’s guidance on changes to an application after it has been submitted, the ExA’s published response letter (PD-004) and the consultation responses received (Appendix L), in formulating the Change Request. The Applicant considers that this change application is of sufficient standard for examination.</p> <p>As discussed in Section 2, the Change requires very minor changes to a small amount of Application documentation which can be easily delivered. As such the Application will remain of a sufficient standard for examination.</p>
<p><i>Sufficient consultation on the changed application can be undertaken to allow for the examination to be completed within the statutory timetable.</i></p>	<p>The Applicant has carried out appropriate consultation about the Change in accordance with Step 3 of the Advice Page. This consultation has been carried out prior to the start of Examination. The outcome of the consultation is explained in Section 5 of this report.</p>
<p><i>The changes would breach the principles of fairness and reasonableness for parties participating in the examination.</i></p>	<p>Given the minor nature of the Change and that the Change has been submitted prior to the start of Examination following consultation, Interested Parties will have the chance to consider the changed Application in full. The Applicant therefore does not consider the Change to breach the principles of fairness and reasonableness.</p>
<p><i>Any other procedural requirements can still be met.</i></p>	<p>The Applicant does not foresee any reason as to why any other procedural requirements will not be met as a result of this Change application.</p>

3.2. **NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS: CHANGES TO AN APPLICATION AFTER IT HAS BEEN ACCEPTED FOR EXAMINATION (PINS, AUGUST 2024)³**

- 3.2.1. The Applicant has also had regard to the Advice Page.
- 3.2.2. The Advice Page provides advice on the information that is to be included in any Change Request. This advice, and where the relevant information can be found within this Change Request, is set out in **Table 3-2**.

Table 3-2 – Information available within this Change Request Report

Information to include in the change application	Where provided within this Change Request Report
A confirmed description of the proposed change. Where this has changed from that provided with the change notification this should be clearly explained.	A confirmed description of the proposed change is provided in Section 2. The description of the Change has not changed since the ExA was first notified on 15 August 2024 by of the Applicant’s Notification of Intention to Submit a Change Request (“NISCR”)(AS-001) .
A confirmed statement setting out the reasons and need for making the change. The applicant should provide any further information that was not included in the change notification.	A confirmed statement setting out the reasons and need for making the change is presented in Section 2.
A full schedule of all application documents and plans listing the revisions to each document and plan which would occur because of the change or, as necessary, marked as ‘no change’.	Section 6 presents a full schedule of all Application documents and plans that need to be revised as result of the Change and which are submitted alongside this Change Request Report. The consequent revisions to each is outlined.
A statement identifying any impact the proposed change would have on securing any consents or licences for the project. The applicant should confirm if there would be any delay in	The Applicant confirms that the Change will not impact on the chances or programme for securing any of the consents or licenses stated in the Other Consents and Licences Statement (APP-043) for the Proposed

³ [Nationally Significant Infrastructure Projects: Changes to an Application after it has been accepted for examination - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

Information to include in the change application	Where provided within this Change Request Report
<p>securing these before the close of the examination.</p>	<p>Scheme, and no new consents or licences are required as a result of the Change.</p>
<p>Clean and track changed versions of the draft DCO showing the proposed changes. Also, clean and track changed versions of the draft explanatory memorandum. If updated versions of these have been submitted into the examination during the pre-examination or examination stage the applicant should check with the Examining Authority which versions should be used for this purpose.</p>	<p>Clean and tracked changed versions of the draft DCO has been submitted with this Change Request. The track changes are made against the draft DCO submitted on 25 September (AS-013).</p> <p>The Applicant confirms that the proposed change does not result in any additions or amendments to the explanatory memorandum (APP-019).</p>
<p>If the proposed change includes a request to include additional compulsory acquisition powers, confirmation that the applicant has consent from all persons with an interest in the additional land that the additional powers can be included in the application.</p>	<p>The Applicant confirms that the Change does not result in the proposed provision of any additional land as defined in the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 and therefore does not engage those Regulations.</p> <p>The Applicant notes that the Advice Page refers to submitting an updated Land Rights Tracker where these Regulations are invoked. Whilst the Regulations are not invoked, the Applicant can in any event confirm that the PLA is the land party affected by the Change as it relates to works in the river. The Land Rights Tracker submitted at Procedural Deadline A reflects the position on discussions with the PLA.</p>
<p>If the proposed change results in any new or different likely significant environmental effects, provision of other environmental information as necessary and confirmation that:</p> <ul style="list-style-type: none"> the effects of the proposed change have been adequately assessed and that the environmental information has been subject to publicity. Whilst 	<p>The Applicant confirms that the Change will not result in any new or different likely significant environmental effects. This is reported on in detail at Section 4.</p> <p>The consultation on the proposed change referred consultees to the initial environmental considerations set out in the Applicant's Notification of the Change Request (AS-001)</p>

Information to include in the change application	Where provided within this Change Request Report
<p>this is not a statutory requirement, the publicity should reflect the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017)</p> <ul style="list-style-type: none"> any consultation bodies who might have an interest in the proposed change have been consulted (reflecting the requirements of the EIA Regulations 2017). The Applicant should identify those consultation bodies who were consulted on the proposed changes but were not consulted on the original application. 	<p>and the conclusions of that initial analysis have not changed.</p> <p>The Applicant consulted with all consultation bodies required by the EIA Regulations 2017 on the Change – see Appendix C. There were no consultation bodies who were consulted on the proposed Change who were not consulted on the DCO Application.</p> <p>As the Change does not lead to any new or different likely significant environmental effects there was no requirement to consult on the full environmental information contained in Section 4 prior to its submission.</p>
<p>Where consultation has been carried out (either voluntarily, at the direction of the Examining Authority, or in accordance with the requirements of the CA Regulations or EIA Regulations 2017) a consultation report must be provided. The consultation report should:</p> <ul style="list-style-type: none"> confirm who has been consulted in relation to the proposed change and explain how and why they have been consulted include details of how the applicant has considered the content of the consultation responses received include copies of all consultation responses received, including any responses to publicity about the proposed change. These should be included as an annex to the consultation report 	<p>The consultation carried out as part of this Change Request application is detailed in Section 5. This includes the Applicant’s response to the consultation responses received.</p> <p>The list of consultees is appended at Appendix C.</p> <p>Copies of the consultation responses received are appended at Appendix L.</p>

3.3. EXAMINING AUTHORITY RESPONSE TO NOTIFICATION OF CHANGE REQUEST

3.3.1. In response to the Applicant’s Notification of a proposed Change Request, the ExA issued advice in his response letter (**PD-004**). **Table 3-3** sets out how this Change Request Report responds to the key parts of that advice.

Table 3-3 – Response to Examining Authority’s Advice (PD-004)

ExA Advice	Applicant Response
<p>The ExA notes that there is no specific reference in the Applicant’s NISCR to further review of Chapter 8 of the ES: Marine Biodiversity. Having regard to the nature of the proposed changes, the ExA also considers it prudent for the Applicant to review in detail the implications of the proposed change in terms of the findings and conclusions of Chapter 8 of the ES: Marine Biodiversity and include a clear statement in the Change Application confirming the findings.</p>	<p>The Applicant has considered Marine Biodiversity in Section 4. This confirms the position in the Project update and Applicant’s NISCR (AS-001), that this topic does not lead to any changes to the significance of effects reported in the Environmental Statement and no new or different likely significant environmental effects are identified.</p>
<p>The ExA notes from the NISCR that the Applicant considers there would be no change to the conclusions of the Information to Inform Appropriate Assessment (APP-090) as a result of the proposed change. The Applicant will also need to confirm whether there would be any change to the conclusions of the Water Framework Directive Assessment (APP-106) and Flood Risk Assessment and Technical Note (APP-107, APP-142).</p>	<p>Section 4 confirms that there are no changes to the conclusions of Appendix 11-1 Water Framework Directive Assessment (APP-016) or Appendix 11-2 Flood Risk Assessment (AS-023) of the Environmental Statement as a result of the Change.</p>
<p>As Step 3 of the Advice requires consultation of all persons prescribed under PA2008 Section 42(1)(a) to (d) affected by a change, this should include the Marine Maritime Organisation (MMO), the Greater London Authority and the relevant local authorities. As the Applicant will be aware the MMO have made detailed comments</p>	<p>Section 6 and Appendix C confirms that the Applicant consulted all section 42(1)(a) to (d) parties. This included all land interests, the MMO, the London Borough of Bexley and the Greater London Authority.</p>

ExA Advice	Applicant Response
<p>regarding implications of piling and dredging in their Relevant Representation (RR-134). In any formal Change Application, the Applicant must provide justification as to why any person under section 42(1)(a) to (d) is not affected by the proposed changes and has not therefore been consulted.</p>	
<p>The Applicant should....</p> <ul style="list-style-type: none"> • consider whether or not persons not already expecting to participate in the Examination (and not falling within section 42) might need an opportunity to comment (such as persons living or commercial entities operating outside the Order Limits); and • whether or not any newspaper notices or site notices are necessary to inform these persons about the proposed changes 	<p>As described in Section 6, the Applicant placed notices in: the local newspaper, the Bexley and Bromley News Shopper; the Guardian; and published the same notice in the London Gazette, Lloyd’s List and Fishing News, and on Site.</p>
<p>The Applicant submits a statement that confirms no new persons (affected by the proposed change) under section 42(1)(a) to (d) have been identified who need consulting.</p>	<p>The Applicant confirms that no new persons under section 42(1)(a) to (d) have been identified who need to be consulted.</p>

4. SUPPORTING ENVIRONMENTAL INFORMATION

4.1. INTRODUCTION

- 4.1.1. The Change has been reviewed and appraised, as summarised in **Table 4-1** below, to identify any likely significant effects that would be materially new or materially different from those presented in the **Environmental Statement (Volume 1), Chapter 5: Air Quality (APP-054)** to **Chapter 21: Cumulative Effects (APP-70)**.
- 4.1.2. The Change has also been appraised in the context of the findings presented in the following appendices of the **Environmental Statement (Volume 3)**. The results of this are presented in **Table 4-1** below.
- **Appendix 6-3: Underwater Noise Assessment (APP-084);**
 - **Appendix 7-1: Biodiversity Net Gain Report (APP-088);**
 - **Appendix 7-3: Information to Inform a Habitat Regulations Assessment (APP-090);**
 - **Appendix 11-1: Water Framework Directive Assessment (APP-106);**
 - **Appendix 11-2: Flood Risk Assessment (APP-107);**
 - **Appendix 11-4: Coastal Modelling Studies (APP-109); and**
 - **Appendix 19-1: Preliminary Navigation Risk Assessment (APP-115).**

Table 4-1 – Summary of the Environmental Appraisal for the Change

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
5	Air Quality	<p>The Change is within the Site and Study Area assessed in Chapter 5: Air Quality (Volume 1) of the Environmental Statement (APP-054).</p> <p>The Change is not expected to alter the outcomes of the construction phase air quality assessment, as it does not require additional construction vehicle or vessel movements. Consequently, it would not affect the conclusions of the current assessment.</p> <p>In the assessment presented in Chapter 5: Air Quality (Volume 1) of the Environmental Statement (APP-054), emissions from marine vessels during the operation phase assessment were calculated conservatively (i.e. worst-case assumptions were made); the contribution from marine vessel emissions had very little influence on the overall conclusions. For example, marine vessels contributed an extremely small (<1%) proportion of the total nitrogen deposition impact at ecological sites. The Change will enable a decrease in the number of marine vessel movements (with a consequential reduction in marine emissions compared to the existing assessment) as well as an increase in the size of the marine vessels (which will increase marine emissions compared to the existing assessment). Overall, the Change will not significantly alter the net mass of emissions from marine vessels compared to the existing assessment, especially accounting for the conservatism built into the emissions calculations. Regardless, even if the change in the mass of emissions from marine vessels with the Change were to be significant, the contribution from marine vessels would still have very little bearing on the overall conclusions. Therefore, it can be concluded that the Change will not affect the outcome of the air quality assessment.</p> <p>The findings of, and the assessment presented in, Chapter 5: Air Quality (Volume 1) of the Environmental Statement (APP-054) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
6	Noise and Vibration	<p>The Change is within the Site and Study Area assessed in Chapter 6: Noise and Vibration (Volume 1) of the Environmental Statement (APP-055).</p> <p>The Change is not expected to alter the outcome of the construction and operation phase noise assessments. The model used to inform the noise assessments was based on a worst-case assumption that the vessel's underwater noise levels would be similar to the underwater noise level arising from dredging activities, which is generally noisier than vessels. The noise level parameters from the vessels associated with the Change (that are larger in capacity and size) are lower than the worst-case parameters assumed for the original assessment. Therefore, a minor increase in vessel capacity and size would not affect the overall conclusion of the assessments.</p> <p>The findings of, and the assessment presented in, Chapter 6: Noise and Vibration (Volume 1) of the Environmental Statement (APP-055) remain as reported.</p>
7	Terrestrial Biodiversity	<p>The Change is within the Site and Study Area assessed in Chapter 7: Terrestrial Biodiversity (Volume 1) of the Environmental Statement (APP-056).</p> <p>It is considered that only wintering birds and breeding birds could be impacted by the Change, given their presence within the River Thames. The Change does not alter the above-water design of the Proposed Jetty in a way that exceeds the parameters of the assessment as described within Chapter 2: Site and Proposed Scheme Description of the Environmental Statement (Volume 1) (APP-051), which the terrestrial biodiversity assessment is based upon. In addition, there would be no alteration in the situation with regard to air quality or noise levels (see responses in the rows above) on ecological features including wintering and breeding birds. Therefore, the Change would not alter the impacts from either the construction or operation of the Proposed Scheme and consequent effects on wintering and breeding birds.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>The findings of, and the assessment presented in, Chapter 7: Terrestrial Biodiversity (Volume 1) of the Environmental Statement (APP-056) remain as reported.</p>
8	Marine Biodiversity	<p>The Change is within the Site and Study Area assessed in Chapter 8: Marine Biodiversity (Volume 1) of the Environmental Statement (APP-057).</p> <p>The increase in length of the sheet piled wall during the construction phase will result in additional loss of subtidal habitat. This is negligible in the context of the total area of subtidal habitat within the Thames Middle Transitional Water Framework Directive (WFD) Water Body habitats. With the mitigation measures adhered to (for example, no impact piling will occur at night) and that piling activity will not be continuous (limited to 30 minutes per day for percussive piling) a window for upstream fish migration will be available, as incorporated within the Outline Code of Construction Practice (AS-029).</p> <p>The increase in length of sheet piled wall does not result in any change to the assessment as the increase in length is minimal and wholly contained within the subtidal zone; further, there are no anticipated changes to the vibro-piling and impact piling.</p> <p>The Change to increase capital dredging volumes and depth, would lead to an increase in dredged arisings during the construction phase. However, based on the limited increase in the quantity of dredged arisings generated and the dredging durations are predicted to remain the same (at six months), the effect on marine biodiversity from the Change would be minor and would not alter the conclusions of the assessment. During the operation phase, the increase in vessel size enables a reduction of the number of vessel movements required to transport the LCO₂. This has the potential to reduce operational impacts such as ship strike on marine mammals and further reduce any potential spread of INNS. During the operation phase, there will be an increase in the dredged arisings by 1,000m³ (or 10% of the original volume) a year as a result of the</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>Change. The scale of this increase is not expected to result in any changes to the initial assessment outcomes.</p> <p>The findings of, and the assessment presented in, Chapter 8: Marine Biodiversity (Volume 1) of the Environmental Statement (APP-057) remain as reported.</p>
9	Historic Environment	<p>The Change is contained within the Site and Study Area as assessed in Chapter 9: Historic Environment (Volume 1) of the Environmental Statement (APP-058).</p> <p>Further marine surveys are proposed to establish the presence and likely significance of any potential archaeological remains present within the footprint of the capital dredge, as already set out in Chapter 9: Historic Environment (Volume 1) (APP-058). Whilst the Change would involve a greater dredge volume and depth, the impact on potential archaeological remains within the channel bed has already been assessed (as the previous proposed depth of -10.5 Chart Datum is likely of a sufficient depth to impact any archaeological remains present within the river bed sediment). The minor increase in dredge volume would not affect the predicted magnitude of change for both the construction and operation phase assessments. Therefore, the Change would not alter the outcome of the assessment already undertaken, nor the proposed mitigation strategy as set out in Chapter 9: Historic Environment (APP-058) and secured by the Draft DCO (Revision C).</p> <p>The findings of the assessment in, Chapter 9: Historic Environment (Volume 1) of the Environmental Statement (APP-058) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
10	Townscape and Visual	<p>The Change is within the Site and Study Area assessed in Chapter 10: Townscape and Visual (Volume 1) of the Environmental Statement (APP-059).</p> <p>Given the nature and minor scale of the Change, this is not anticipated to change the outcomes of the townscape and visual assessment during both the construction and operation phases, given that the above-water design of the Proposed Jetty will remain within the parameters of the assessment as described within Chapter 2: Site and Proposed Scheme Description of the Environmental Statement (Volume 1) (APP-051) which the assessment is based upon, and berthed vessels will be a short term impact to the environment.</p> <p>The findings of, and the assessment presented in, Chapter 10: Townscape and Visual (Volume 1) of the Environmental Statement (APP-059) remain as reported.</p>
11	Water Environment and Flood Risk	<p>The Change is within the Site and Study Area assessed in Chapter 11: Water Environment and Flood Risk (Volume 1) of the Environmental Statement (APP-060).</p> <p>As demonstrated in the further information provided in Appendix A of this report, the sensitivity test run of the coastal hydrodynamic model was carried out incorporating the Change (indicative Proposed Jetty location, dredge depth and area), which showed that there are no significant differences to water surface elevation, current speed, and bed shear stress. In light of this, there are no anticipated changes to the outcomes of the water environment and flood risk assessment during both the construction and operation phases.</p> <p>The findings of, and the assessment presented in, in Chapter 11: Water Environment and Flood Risk (Volume 1) of the Environmental Statement (APP-060) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
12	Climate Resilience	<p>The Change is within the Site and Study Area assessed in Chapter 12: Climate Resilience (Volume 1) of the Environmental Statement (APP-061).</p> <p>The design of the Proposed Jetty would continue to incorporate allowance for future climate change impacts (as stated in Chapter 12: Climate Resilience (Volume 1) of the Environmental Statement (APP-061)).</p> <p>The findings of, and the assessment presented in, Chapter 12: Climate Resilience (Volume 1) of the Environmental Statement (APP-061) remain as reported.</p>
13	Greenhouse Gases	<p>The Change is within the Site and Study Area assessed in Chapter 13: Greenhouse Gases (Volume 1) of the Environmental Statement (APP-062).</p> <p>The increase to capital dredging volumes and depth, and the increase in the size of the sheet pile retaining wall, would lead to an increase in materials used and dredged arisings during the construction phase. There would be an associated increase in embodied carbon for the manufacture and transport of materials used in the construction phase, along with increased emissions for the transport and recycling or disposal of construction waste, including dredging arisings. Transport for the construction of the Proposed Jetty will primarily be via the River Thames. Considering the limited increase in the quantity of materials required by the Change, and dredging arisings generated, the effect on total greenhouse gases emissions reported for the Proposed Scheme would be minor and would not alter the findings of the GHG assessment.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>There would be no change to the assessment of greenhouse gases emissions during the operation phase as the revised marine vessel size and movements remains in the range specified for emissions factors⁴ used to determine carbon emissions for marine transport⁵.</p> <p>The findings of, and the assessment presented in, Chapter 13: Greenhouse Gases (Volume 1) of the Environmental Statement (APP-062) remain as reported.</p>
14	Population, Health and Land Use	<p>The Change is within the Site and Study Area assessed in Chapter 14: Population, Health and Land Use (Volume 1) of the Environmental Statement (APP-063).</p> <p>As set out in the Marine Biodiversity row of this table, with mitigation in place the increase in the size of the sheet pile retaining wall during the construction phase is not anticipated to lead to a change in the anticipated impacts on fish populations, thus there would not be a change in the assessment outcomes in relation to angling during construction. The Change would not lead to a change in vessel movements and access to the nearby jetties during the construction phase. Consequently, the assessment on businesses that are reliant on the River Thames, recreational users of the River Thames as well as human health, mental health and wellbeing does not change.</p>

⁴ Factor is 0.01468 kgCO₂/tonne.km for Freighting Goods - Sea Tanker: LNG Tanker: 0–199,999 m³.

⁵ BEIS. (2023). 'Greenhouse gas reporting: conversion factors 2023'. Available at: <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>.

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>As set out in the Marine Biodiversity row of this table, the increase in dredging during the operation phase is not anticipated to change the outcomes of the marine biodiversity assessment, thus there would not be a change in the assessment outcomes in relation to angling during operation.</p> <p>Given the Change would enable a reduction in the number of project related vessel movements during the operation phase and the navigational risk would be managed through the full NRA, it is anticipated that operational changes to vessel sizes and movements would not change the outcomes of the assessment in relation to businesses that are reliant on access to the River Thames, recreational users of the River Thames as well as human health, mental health and wellbeing.</p> <p>The findings of, and the assessment presented in, Chapter 14: Population, Health and Land Use (Volume 1) of the Environmental Statement (APP-063) remain as reported.</p>
15	Socio-economics	<p>The Change is within the Site and Study Area assessed in Chapter 15: Socio-economics (Volume 1) of the Environmental Statement (APP-064).</p> <p>Given the nature of the Change, no change is anticipated to the outcomes of the socio-economic assessment.</p> <p>The findings of, and the assessment presented in, Chapter 15: Socio-economics (Volume 1) of the Environmental Statement (APP-064) remain as reported.</p>
16	Materials and Waste	<p>The Change is within the Site and Study Area assessed in Chapter 16: Materials and Waste (Volume 1) of the Environmental Statement (APP-065).</p> <p>The Change to increase capital dredging volumes and depth and the increase in the size of the sheet pile retaining wall, would lead to an increase in materials used and dredged arisings during the construction</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>phase. Considering the minimal increase (in the context of regional availability) in the quantity of materials required by the Change and dredged arisings generated, the effect on materials and waste would be minor and would not alter the findings of the assessment.</p> <p>During the operation phase, there will be an increase in the dredged arisings, as the maintenance dredging volume is anticipated to increase by 1,000m³ as a result of the Change. However, this minimal increase in the context of regional availability would be minor and would not alter the findings of the assessment.</p> <p>The findings of, and the assessment presented in, Chapter 16: Materials and Waste (Volume 1) of the Environmental Statement (APP-065) remain as reported.</p>
17	Ground Conditions and Soils	<p>The change is within the Site and Study Area assessed in Chapter 17: Ground Conditions and Soils (Volume 1) of the Environmental Statement (APP-066).</p> <p>The increase in capital dredging volumes and depth would result in an increase in the material that is potentially contaminated during the construction phase. Given the relatively small change in the volume of dredged arisings, the potential impact of the Proposed Scheme would be minor. Therefore, with the mitigation measures within Section 17.7 of Chapter 17: Ground Conditions and Soils (Volume 1) of the Environmental Statement (APP-066) the findings of the assessment would not be altered.</p> <p>During the operation phase, as a result of the Change, there will be an increase in the dredged arisings by 1,000m³ (or 10% of the original volume) a year. This minor increase is not expected to result in any changes to the initial assessment outcome as the maintenance dredged arisings will continue to be managed in accordance with relevant legislation and will be disposed of offsite, undertaken by an appropriately licenced waste carrier.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>The findings of, and the assessment presented in, Chapter 17: Ground Conditions and Soils (Volume 1) of the Environmental Statement (APP-066) remain as reported.</p>
18	Landside Transport	<p>The Change is within the Site and Study Area assessed in Chapter 18: Landside Transport (Volume 1) of the Environmental Statement (APP-067).</p> <p>As the transport for the construction of the Proposed Jetty and capital dredge will primarily be via the River Thames (as stated in Chapter 2: Site and Proposed Scheme Description (Volume 1) of the Environmental Statement (APP-051), the Change would not result in additional construction phase or operation phase movements on the landside local transport networks.</p> <p>The findings of, and the assessment presented in, Chapter 18: Landside Transport (Volume 1) of the Environmental Statement (APP-067) remain as reported.</p>
19	Marine Navigation	<p>The Change is within the Site and Study Area assessed in Chapter 19: Marine Navigation of the Environmental Statement (APP-068).</p> <p>This chapter relies upon the findings of Appendix 19-1: Preliminary Navigational Risk Assessment of the Environmental Statement (APP-115), which has been updated (Revision C), and the conclusions of the assessment during the construction and operation phases have not changed.</p> <p>The findings of, and the assessment presented in, Chapter 19: Marine Navigation of the Environmental Statement (APP-068) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
20	Major Accidents and Disasters	<p>The Change is within the Site and Study Area assessed in Chapter 20: Major Accidents and Disasters (Volume 1) of the Environmental Statement (APP-068).</p> <p>The nature of the Change would not result in any change to the risk of the Proposed Scheme or risk as a result of the Proposed Scheme to the major accidents and disaster events identified in the Environmental Statement during both the construction and operation phases.</p> <p>The findings of, and the assessment presented in, Chapter 20: Major Accidents and Disasters (Volume 1) of the Environmental Statement (APP-068) remain as reported.</p>
21	Cumulative Effects	<p>The Change is within the Site and Study Area assessed in Chapter 21: Cumulative Effects (Volume 1) of the Environmental Statement (APP-069).</p> <p>The Change would not affect the findings of the individual chapters of the Environmental Statement (APP-054 to APP-069) and consequently would not affect the assessment of cumulative effects with identified committed developments. No additional or changed inter-project or intra-project effects are predicted during either the construction or operation phases.</p> <p>The findings of, and the assessment presented in, Chapter 21: Cumulative Effects (Volume 1) of the Environmental Statement (APP-069) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
6-3	Underwater Noise Assessment	<p>The Change is within the Site and Study Area assessed in Appendix 6-3: Underwater Noise Assessment (Volume 3) of the Environmental Statement (APP-083).</p> <p>During the construction phase, the increased dredging depths required and the associated increased dredging volumes will not increase the dredging underwater noise level as the dredging method and duration will remain within the parameters of the assessment.</p> <p>During the operation phase, the increase in vessel capacity, and subsequent increase in size, will result in a negligible increase in underwater noise level from the originally proposed vessels, which is also explained in the Noise and Vibration row above. The noise level parameters from the vessels associated with the Change (that are larger in capacity and size) are lower than the worst-case parameters assumed for the original assessment. Therefore, a minor increase in vessel capacity and size would not affect the overall conclusion of the assessment.</p> <p>The findings of, and the assessment presented in Appendix 6-3: Underwater Noise Assessment (Volume 3) of the Environmental Statement (APP-083) remain as reported.</p>
7-1	Biodiversity Net Gain Report	<p>The Change is within the Site and Study Area assessed in Appendix 11-1: Biodiversity Net Gain Report (Volume 3) of the Environmental Statement (APP-088).</p> <p>Changes to the sheet piled wall will take place in the subtidal zone, therefore will not result in a direct loss of intertidal habitat.</p> <p>The findings of, and the assessment presented in Appendix 7-1: Biodiversity Net Gain Report (Volume 3) of the Environmental Statement (APP-083) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
7-3	Information to Inform a Habitat Regulations Assessment	<p>The Change is within the Site and Study Area assessed in Appendix 7-3: Information to Inform a Habitat Regulations Assessment (Volume 3) of the Environmental Statement (APP-090). This Application document considered effects to Epping Forest Special Area of Conservation (SAC) during the operation phase only.</p> <p>The increase in vessel capacity, and subsequent increase in size, will not require additional land take or significantly vary the operational emissions. As a result, no changes are predicted to the assessment of effects on the Epping Forest SAC.</p> <p>The findings of, and the assessment presented in Appendix 7-3: Information to Inform a Habitat Regulations Assessment (Volume 3) of the Environmental Statement (APP-090) remain as reported.</p>
11-1	Water Framework Directive Assessment	<p>The Change is within the Site and Study Area assessed in Appendix 11-1: Water Framework Directive Assessment (Volume 3) of the Environmental Statement (APP-106).</p> <p>This Application document incorporates an assessment of potential effects to water quality from sediment releases associated with the capital dredging (construction phase) and maintenance dredging (operation phase). The assessment was based upon grab samples of surface sediments, collected as part of a coordinated assessment of physical, chemical and benthic biological baseline conditions. This is considered a reasonable approach to provide an indication of likely contaminant within the sediments proposed to be dredged and inform the mitigation measures secured through the Outline CoCP (AS-029) and the DML (within the Draft DCO (AS-014)). As the initial assessment was based solely on the surface sediment sampling, the change in maximum downward depth of dredging would not change the initial assessment outcome. Notwithstanding, the Applicant has committed, within the Water Framework Directive Assessment (Volume 3) of the Environmental Statement (APP-106), to complete additional sediment</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>sampling at depth across the proposed capital and maintenance dredging profile, to corroborate the conclusions of Appendix 11-1: Water Framework Assessment of the Environmental Statement (Volume 3) (APP-106). The Change to the dredging profile does not have an impact on the methodology for the additional sediment sampling, which has been reviewed and commented upon by the relevant stakeholders (MMO, PLA and Cefas). This agreed methodology remains compliant with the OSPAR Guidelines for the Management of Dredged Material⁶, which remains applicable for a dredge volume of between 100,000 – 500,000 m³. The proposed sample depths remain representative of the change to the dredge depth profile.</p> <p>The Change will incorporate a small increase (by approximately 10% of the assessed volume) in the dredged arisings during operation. Given the volume increase is relatively minor, this is not expected to result in any significant change to the initial assessment outcome, based on the results of the surface sediment sampling. Any adverse effects attributed to increased suspended sediments would be modest and remain temporary and localised in the context of the wider water body. This outcome will be further corroborated upon receipt of the results of the proposed sediment sampling at depth (discussed above).</p> <p>Regarding biological elements and habitats, the increase in length of the sheet piled wall during the construction phase will result in additional loss of subtidal habitat. This is negligible in the context of the total area of subtidal habitat within the Thames Middle Transitional Water Framework Directive (WFD) Water Body. With the mitigation measures adhered to (for example, no impact piling will occur at night) and that piling activity will not be continuous (limited to 30 minutes per day for percussive piling) a window for upstream fish migration will be available, as incorporated within the Outline Code of Construction</p>

⁶ OSPAR Commission (2024 Update). OSPAR Guidelines for the Management of Dredged Material. Available at: <https://www.ospar.org/documents?v=33037#:~:text=develop%20local,%20regional%20and%20national%20dredged%20material%20management%20plans%20in.>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
		<p>Practice (AS-029)), the increase in length of sheet piled wall does not result in any changes to the assessment as the increase in length is minimal and it is all contained within the subtidal zone. With the dredging durations predicted to remain the same (six months) there is no change to the scale of impacts during the operation phase arising from increased dredging volumes and depths.</p> <p>The increase in vessel size enables a reduction in the number of vessel movements required to transport the CO₂, with consequent reduction in operational impacts such as ship strike on marine mammals and the potential spread of INNS.</p> <p>The findings of, and the assessment presented in Appendix 11-1: Water Framework Directive Assessment (Volume 3) of the Environmental Statement (APP-106) remain as reported.</p>
11-2	Flood Risk Assessment	<p>The Change is within the Site and Study Area assessed in Appendix 11-2: Flood Risk Assessment (Volume 3) of the Environmental Statement (APP-107).</p> <p>The Change would alter the location and depth of the works within the River Thames, a waterbody which poses flood risk to the Site in the event of a defence breach. As demonstrated in the further information provided in Appendix A of this report, the sensitivity test run of the coastal hydrodynamic model was carried out incorporating the Change, which showed that there are no significant differences to water surface elevation.</p> <p>The findings of, and the assessment presented in Appendix 11-2: Flood Risk Assessment (Volume 3) of the Environmental Statement (APP-107) remain as reported.</p>

ES Chapter / Appendix Number	ES Chapter / Appendix Heading	Likely Effect of the Changes
11-3	Coastal Modelling Studies	<p>The Change is within the Site and Study Area assessed in Appendix 11-3: Coastal Modelling Studies (Volume 3) of the Environmental Statement (APP-109).</p> <p>A sensitivity test run of the coastal hydrodynamic model was carried out incorporating the Change, which showed that there are no significant differences to water surface elevation, current speed, and bed shear stress; further information is provided within Appendix A of this report. This means that the Change is not anticipated to alter the conclusions of the hydrodynamic, dredge dispersion, and sediment transport modelling.</p> <p>The findings of, and the assessment presented in Appendix 11-3: Coastal Modelling Studies (Volume 3) of the Environmental Statement (APP-109) remain as reported.</p>
19-1	Preliminary Navigation Risk Assessment	<p>The Change is within the Site and Study Area assessed in Appendix 19-1: Preliminary Navigational Risk Assessment of the Environmental Statement (APP-115).</p> <p>This appendix has been updated (Revision C, submitted alongside this report) in light of the Change, incorporating revised mitigation measures at Section 10.11. Providing these measures are adhered to, the conclusions of the assessment of navigational risk have not changed.</p> <p>The findings of, and the assessment presented in Appendix 19-1: Preliminary Navigational Risk Assessment of the Environmental Statement (APP-115) remain as reported.</p>

5. CONSULTATION

5.1. INTRODUCTION

- 5.1.1. In relation to the Change Request the Applicant has carried out targeted consultation with parties with an interest in the Application.
- 5.1.2. The consultation was undertaken between 20 September and 20 October 2024. Given the technical nature of navigational risk assessments, the Applicant has carried out specialist engagement with the PLA and CLdN to consider the Change from a navigational risk perspective. The Applicant notified all those parties who fall under the categories set out in section 42(1)(a)-(d) of the Planning Act 2008 (**Appendix B**). The full list of organisations notified about the Change Request can be found at **Appendix C**.
- 5.1.3. Recognising that other individuals and groups in the vicinity of the Site may be interested in the Change, the Applicant placed a notice in the local newspaper (Bexley and Bromley News Shopper) as well as national publications: The Guardian; Fishing News; London Gazette; and Lloyd’s List.

Table 5-1 – Notices Published in Local and National Newspapers

Local or National	Title	Date appeared
Local	Bexley and Bromley News Shopper (Appendix D)	18 September 2024
National	The Guardian (Appendix E)	19 September 2024
	Fishing News (Appendix F)	19 September 2024
	London Gazette (Appendix G)	19 September 2024
	Lloyd’s List (Appendix H)	19 September 2024

- 5.1.4. The Applicant also placed notices around the Site on 19 September 2024, in the same locations as used for previous consultation notices. A map of the notice locations can be found at **Appendix I**.
- 5.1.5. Letters sent to the parties falling under the categories set out in section 42(1)(a)-(d) of the Planning Act 2008 and notices placed in newspapers and around the Site notified parties about the Change, directing them to the Applicant’s project website. The website contained information about the Change, why it is needed, what it means for the Application documentation, and a summary of the Applicant’s view of the environmental impacts of the Change compared to the submitted **Environmental Statement (APP-106)** and **Appendix 7-3 - Information to Inform a Habitat Regulations Assessment (APP-090)** documentation.

5.1.6. The content that was made available on the Applicant's project website can be seen in **Appendix J**.

5.2. SUMMARY OF RESPONSES TO THE PROPOSED CHANGE

5.2.1. This section presents a summary of the comments received and the Applicant's response to them.

5.2.2. Consultation feedback was accepted via the following methods:

- Email: decarbonisation@corygroup.co.uk
- Post: FREEPOST CORY CCS

5.2.3. The Applicant received comment from the following twelve organisations.

5.2.4. **Appendix K** presents the comment received and the Applicant's response to each organisation:

- Dartford Borough Council;
- GTC UK;
- Kent County Council;
- Marine Management Organisation;
- Maritime and Coastguard Agency;
- National Grid;
- National Highways;
- Natural England;
- NATS Safeguarding;
- Port of London Authority;
- Royal Borough of Greenwich; and
- Thames Water Utilities Ltd.

Table 5-2 – Summary of Responses

Organisation	Consultation Matters Raised	Applicant's Response
Dartford Borough Council	Nothing further to add to comments submitted on 12 June 2024.	Noted
GTC UK	Seeking confirmation on whether their assets will be affected and the Proposed change	Confirmed assets are not affected
Kent County Council	Confirmed no interest in the land the subject of the Change.	Noted
Marine Management Organisation	<p>No major concerns regarding the Changes, however, makes comment on the following matters:</p> <ul style="list-style-type: none"> ● Dredge and Disposal; ● Benthic Ecology; ● Coastal Processes; ● Shellfisheries; ● Fisheries and Fish Ecology; and ● Underwater Noise. <p>Recommends that the Change is appropriately assessed, and evidence is presented to demonstrate why the change is not likely to result in changes to the significance of effects.</p>	<p>Appendix K of this Report addresses each of the matters raised by the MMO.</p> <p>Table 4-1 of this report demonstrates the Applicant's conclusion that the Change is not likely to result in changes to the significance of effects.</p>

Organisation	Consultation Matters Raised	Applicant's Response
Maritime and Coastguard Agency	Seeks an updated assessment for shipping and safe navigation through a Navigation Risk Assessment (NRA), in accordance with the Port Marine Safety Code and its Guide to Good Practice, recognising the Applicant's intention to update the pNRA (APP-115). Expects ongoing consultation with the PLA and welcomes ongoing engagement with other stakeholders relevant to the River Thames.	The pNRA has been updated in line with the Change. The conclusions of the updated pNRA are similar to the previous version. Chapter 19: Marine Navigation (Volume 1) of the Environmental Statement (APP-068) has been checked and does not require any updates as the conclusions remain valid.
National Grid.	Confirmed no existing apparatus within or in close proximity to the site the subject of the Change.	Noted
National Highways	No comment.	Noted
Natural England	Does not consider it necessary to make any comments on the Change.	Noted
NATS Safeguarding	Anticipates no impact from the Change and raises no objections.	Noted
Port of London Authority	<p>Confirms that further simulation work is not required, albeit that the pNRA and vessel interaction study need revision.</p> <p>Otherwise reserves position until further information is received in regard to the potential for new or materially different impacts, in particular in relation to marine navigation and sediment sampling.</p> <p>Welcomes ongoing dialogue with the Applicant.</p>	<p>Appendix K of this Report addresses each of the matters raised by the PLA.</p> <p>Table 4-1 of this report demonstrates the Applicant's conclusion that the Change is not likely to result in changes to the significance of effects.</p>

Organisation	Consultation Matters Raised	Applicant's Response
Royal Borough of Greenwich	Acknowledges receipt and formally confirms that it has no further observations to make on the Change.	Noted
Thames Water Utilities Ltd	Confirmed no specific comments to make this time.	Noted

6. SCHEDULE OF REVISED APPLICATION DOCUMENTS

6.1. INTRODUCTION

6.1.1. In order to assist the Examining Authority in the consideration of the changes, **Table 6-1** sets out the Application documents that have been updated to accompany this Change Request, with brief details of how they have been updated.

Table 6-1 – Schedule of Revised Application Documents

Document Number	Document Title	Change made Since Previous Version
3.1 (AS-014)	Draft Development Consent Order (clean and tracked)	Article 2 definition of ‘limits of deviation’. Schedule 13 – to account for updates to the Land Plans and Works Plans Schedule 16 – number of breasting dolphins changes to 4.
2.2 (AS-006)	Land Plans	Reduction in size of plot 02-004 to reflect changes to Works Plans.
2.3 (AS-007)	Works Plans	Reduction in size of Work No. 4B.
2.5 (APP-011)	Engineering Plans - Indicative Equipment Layout	Amended to reflect changes to the Proposed Jetty positioning, dredge pocket and associated retaining wall extent, and the inclusion of two additional breasting dolphin structures.
2.12 (APP-017)	Engineering Plans - Proposed Jetty Indicative Drawing	Amended to reflect changes to the Proposed Jetty positioning, dredge pocket and associated retaining wall extent, and the inclusion of two additional breasting dolphin structures.
4.3 (AS-016)	Book of Reference (clean and tracked)	Reduction in stated size of plot 02-004 to reflect changes to Land Plans.
6.3 (AS-025)	Preliminary Navigational Assessment (p)NRA	Changes in the proposed design vessel size envelope. Changes in the Proposed Jetty indicative design as a result. Resulting updates in the preliminary risk assessment and navigation risk profile.
1.4 (AS-005)	Application Document Tracker	To reflect the above.

7. CONCLUSIONS

7.1. SUMMARY

- 7.1.1. The Applicant has, since the acceptance of the Application, been working with Viking CCS (the CCS storage partner) to further develop its understanding for usage of the Proposed Jetty, not least to ensure this best achieves the aims of the Government in bringing forward Non-Pipeline Transport as part of the CCS sector.
- 7.1.2. This work has led to the Applicant considering that the Proposed Jetty, and associated dredging, should now be designed to facilitate a maximum vessel size of approximately 20,000m³, rather than the 15,000m³ previously considered in the Application documentation. This comprises the 'Change' now sought.
- 7.1.3. The Change will enable a decrease in the number of marine vessel movements which would:
- facilitate more economically efficient operation (aligned with Government objectives) due to less fuel consumption, port fees and capital costs. This is in line with NPS EN-1 paragraph 4.9.6 which states that "*The barriers to CCS deployment to date have been commercial rather than technical, and the business models, which may evolve over time, aim to support the deployment of the technology*";
 - allow for faster CO₂ unloading rate when it reaches its destination terminal, which will be beneficial to the CCS sector as a whole given the other potential users that would be using the Immingham Green Energy Terminal with Viking taking it forward - making the CCS sector more attractive to potential adopters and contributing to the Government's ambitions for CCS in the UK; and
 - allow for lower carbon intensity of the transport movements associated with the Proposed Scheme, contributing to the overall sustainable nature of this development, in line with paragraph 2.6.1 of NPS EN-1.
- 7.1.4. The Change comprises limited and discrete physical amendments that result in no new or different likely significant environmental effects, as evidenced in the Supporting Environmental Information at Section 4 of this report. The Applicant does not consider the Change to be so substantial as to constitute a materially different project. The description of the Proposed Scheme remains as set out at **Chapter 2 - Site and Proposed Scheme Description** of the **Environmental Statement (APP-051)**.
- 7.1.5. The Proposed Scheme remains a Carbon Capture Facility with a Proposed Jetty to allow the export of the liquified carbon. The Change makes a small modification to the way that the latter activity will happen.

7.1.6. The Applicant has carried out appropriate and proportionate consultation on the Change Request as demonstrated in this report. Copies of all comments received, and the Applicant's response to them are at **Appendix K** and **L** and a summary of both is provided at **Table 5-2**. The Applicant has provided the documents listed in Section 6 in support of this Change Request. The Applicant welcomes confirmation from the ExA that the Change Request can be accepted and that these documents can be examined alongside the DCO Application.



DECARBONISATION

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