

Outer Dowsing Offshore Wind

The Applicant's Response to Procedural Decision and Change Notification dated 8 October

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8th October 2024

Dear Louise,

**Planning Act 2008 – Application for Development Consent
GT R4 Limited, trading as Outer Dowsing Offshore Wind (the “Applicant”)
The Proposed Outer Dowsing Offshore Wind Farm Order
Response to Procedural Decision and Change Notification
Application Reference: EN010130**

The Applicant refers to the Procedural Decision of 30th September (PD-010) in which the Examining Authority (“**ExA**”) requested that the Applicant submit (i) a Change Notification which provides all of the information that relates to any changes that the Applicant wishes to make, collated and summarised, and (ii) a schedule setting out which of those documents submitted on 19th September represent (a) new evidence or revisions to existing evidence submitted as part of the original application, and which make no reference at all to any of the proposed changes (i.e. the ORBA/revised ECC/recently identified public rights of way and an additional pipeline crossing/reduction in areas of land or rights required) and (b) which of those documents submitted on 19 September 2024 refer, either directly or indirectly, to any of the proposed changes.

The Applicant has considered the Planning Inspectorate’s Guidance “Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination” (“**the Guidance**”). The Applicant’s position is that the Guidance available is open to interpretation in terms of what may constitute a change, and notes that there has been inconsistency in approach across DCO examinations in terms of what is or is not treated as a change that requires the change notification procedure to be followed.

The Guidance acknowledges that there are certain changes to application information that may not necessarily result in changes to the proposed project. The examples provided in the Guidance are:

- the submission of new versions of the draft DCO as articles are reviewed, drafting is improved, or requirements are developed

- the submission of amended application documents, plans or environmental information following advice from the Planning Inspectorate about errors or omissions relating to the application documents
- further information or written comments from the applicant in response to the ExA's request under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010
- new information in response to the ExA's written questions

The Applicant considers that the changes to the application information that have been submitted (with the exception of (i) the proposed changes to the mean high and mean low water springs marks discussed at paragraph 1(i) of Appendix 1 and (ii) the proposed changes to the draft DCO to account for proposed new rights of way discussed at paragraph 4(i) of Appendix 1 and Table 1.1 of Appendix 2) do not result in changes to the proposed project. Each change is summarised in Appendix 1, and further details are provided in Appendix 2. The Applicant's overarching view is that (other than in respect of the exceptions noted above) the information provided does not introduce a development scenario which could not have been built out in terms of the application documents (as submitted in March 2024). Instead, the Applicant seeks to refine the proposals early by removing flexibility and optionality at this stage rather than post-consent.

In order to be of assistance to the ExA, this letter summarises at Appendix 1 all changes that the Applicant has proposed to make to the application information, comprising (1) the changes proposed to the application documents as submitted in the Applicant's Response to the section 51 Advice (AS1-001-AS1-109) and which have already been notified to the ExA (2) the changes proposed to the application documents as submitted in the Applicant's response to the Rule 17 Letter dated 31 July 2024 (PD1-001-PD1-102), and (3) additional changes proposed that have not previously been submitted to the ExA.

The Applicant has then set out, at Appendix 2, the information that would be required as part of the change notification (Step 1 of the process for requesting a change to an application in terms of the Guidance) in respect of (1) any proposed change introduced by the Applicant for the first time in the Applicant's response to the Rule 17 letter dated 31 July 2024 (PD1-001-PD1-102) and in respect of which the ExA's procedural decision of 30 September 2024 noted that the ExA had not yet made a decision to accept and (2) additional changes proposed that have not previously been submitted to the ExA.

The Applicant has set out proposed changes to account for new proposed rights of way within Table 1.1 in Appendix 2. After further reflection, the Applicant considers that, if these new rights of way are brought into use, the method of working to account for and mitigate impacts on these rights of way being proposed by the Applicant results in minor changes to the project originally proposed. The Applicant would therefore ask that the ExA treat this submission as a change notification in respect of these particular changes.

Should the ExA decide that, contrary to the Applicant's interpretation, any of the other changes proposed and set out in Appendices 1 and 2 should be considered a change to the Application and considered under the Guidance, the Applicant would ask that this submission be treated as a change notification in respect of the relevant change(s).

The Applicant has then set out in Appendix 3 details of which documents submitted by the Applicant on 19 September 2024: (i) make no reference at all to the proposed changes detailed in Appendix 2 or (ii) directly or indirectly refer to the proposed changes detailed in Appendix 2.

If we can be of any further assistance, please contact Beth Travis [REDACTED]

Yours sincerely,

Chris Jenner

Development Manager
Outer Dowsing Offshore Wind

1 Appendix 1 – Summary of Changes

The changes proposed to the application documents as submitted in the Applicant’s Response to the section 51 Advice (AS1-001-AS1-109)

1. In summary, the documents submitted with the Applicant’s Response to the section 51 Advice incorporated the following changes to the application information:
 - (i) as a consequence of the updated OS mapping, the extent and shape of land plots immediately adjacent to MLWS and MHWS have changed and plot 01-003 has been removed from the Order land;
 - (ii) minor onshore Order Limit reductions as a result of ongoing design refinement and works to refine land plots, which resulted in the removal of unnecessary plots associated with Temporary Works Areas/Compounds, and enabling access routes; and
 - (iii) reductions in the compulsory acquisition rights sought from freehold acquisition to acquisition of permanent rights in respect of certain plots;all as set out in the Schedule of Changes for Plans (AS1-003) and the Schedule of Changes to the Book of Reference (AS1-031). In addition, the detail and explanation of the proposed changes to MLWS and MHWS is set out in the Applicant’s Approach to Ordnance Survey Mapping Update (AS1-109).
2. Following that submission, the ExA issued a procedural decision (PD-007), in which the ExA requested that the Applicant submit a change notification in respect of the changes to the extent and shape of land plots immediately adjacent to MLWS and MHWS. The Applicant accepted that this requires to go through the change notification process due to the additional land which now forms part of the onshore order limits, and submitted that change notification on 29 August 2024 (AS-021). The ExA then issued a further procedural decision advising that the Applicant consult with the Marine Management Organisation (MMO) and Chapel St Leonards Parish Council (PD-008). The Applicant is currently consulting with the MMO and Chapel St Leonards Parish Council as requested.
3. The procedural decision (PD-007) issued by the ExA did not request a change request notification in respect of the minor order limit reductions as a result of ongoing design refinement and works to refine land plots or the reductions in the compulsory acquisition rights sought from freehold acquisition to acquisition of permanent rights. As a result, the Applicant understood that those changes were not considered by the ExA as changes that required the change notification process to be followed.

Changes proposed to the application documents as submitted in the Applicant’s Response to the Rule 17 Letter dated 31 July 2024 (PD1-001-PD1-102)

4. In summary, documents submitted with the Applicant’s Response to the Rule 17 letter dated 31 July 2024 incorporated the following changes to the application information:
 - (i) changes to documents to account for five recently identified proposed Public Rights of Way (“PRoWs”), and the proposed diversions to three of those five PRoWs;
 - (ii) the introduction of the Offshore Restricted Build Area (“ORBA”)
 - (iii) a revision to the Offshore Export Cable Corridor to:
 - a. remove the northern section of the offshore Export Cable Corridor, and

- b. reduce the area within the southern section of the offshore Export Cable Corridor within which the ORCPs could be situated;
 - (iv) minor onshore Order Limit reductions as a result of ongoing design refinement and consultation with landowners, which resulted in the removal of some plots associated with enabling access routes;
 - (v) minor onshore Order Limit reductions as a result of ongoing design refinement and consultation with landowners, which resulted in the removal of some planting at the Onshore Substation (“OnSS”) and a reduction in planting to the west of the OnSS;
 - (vi) reductions in the compulsory acquisition rights sought from freehold acquisition to acquisition of permanent rights in respect of certain plots; and
 - (vii) changes to documents to account for an additional pipeline crossing that has been identified.
5. The Applicant considers that the above changes (with the exception of the proposed changes to the draft DCO to account for proposed new rights of way for which the information to support the change request is set out in Appendix 2) do not result in changes to the project and therefore do not require to be subject to the change notification procedure set out in the Guidance. The reasons the Applicant reached this conclusion are set out in the table below in respect of each change:

Change	Reason the Applicant considers the change notification procedure is not engaged
The introduction of the ORBA	<p>The purpose of the ORBA is to restrict the parts of the array area within which wind turbine generators (“WTGs”) and offshore platforms (“OPs”) can be installed (see Appendix A, Figure 1.0 (document reference PD1-082)).</p> <p>This has been proposed as further mitigation to reduce impacts from the presence of the WTGs (and offshore platforms) on auk species (specifically common guillemot and razorbill) in response to concerns raised by stakeholders regarding the high numbers of birds to the north of the array area. It is proposed to be secured via Requirement 4, Part 3, Schedule 1 of the draft DCO and condition 1, Part 2 of the Deemed Marine Licences forming Schedules 10 (Deemed licence under the 2009 Act - generation assets) and 11 (Deemed licence under the 2009 Act – offshore transmission assets) of the draft DCO (PD1-024).</p> <p>This proposed restriction therefore limits the layout flexibility originally sought by the Applicant within the array area but does not change any project parameter, including number of structures, foundation types, or cable parameters.</p> <p>No change is being proposed to the extent of the array area, as defined within the draft Development Consent Order as the restricted area may be used for cable installation and ancillary operations during construction (and decommissioning) and operations and maintenance works.</p>
Revision to the Offshore Export Cable Corridor	The removal of the northern section of the Offshore ECC takes away optionality that was included in the Project Design Envelope and provides more certainty over the route of the Offshore ECC. The

	<p>minor amendment to the ORCP location within the southern route equally refines the option for placement of the ORCPs. There are no changes to the total maximum offshore export cable lengths, number of cables, number of ORCPs and all other parameters remain as provided within the DCO Application. It is therefore not considered that the reduction in optionality constitutes a change to the project.</p>
<p>Minor onshore Order Limit reductions - removal of some plots associated with enabling access routes</p>	<p>This change removes certain accesses which, following further design refinement and consultation with landowners, have been assessed as no longer being required to construct, operate, maintain or decommission the project. These changes reduce the amount of land required for the project, providing early refinement of previously required flexibility through further engineering work and landowner engagement. It is not considered that they change the project.</p> <p>In addition, on the basis that the ExA did not request a change notification for similar minor reductions following the submission of the Applicant's Response to the section 51 Advice, the Applicant considered that the ExA was content that such reductions did not constitute a change for which the change notification procedure is engaged.</p>
<p>Minor onshore works number amendments – change from landscaping works to drainage works</p>	<p>A small area within the Order Limits has been amended to replace previously included screening planting (which included drainage rights) with drainage rights (Work No. 23 to Work No. 24) east of the A16 at Surfleet Bank. In addition, the width of the screen planting west of the A16 has been reduced from 10 metres to 6 metres, with the area which previously included screening planting now amended to drainage rights (Work No. 23 to Work No. 24).</p> <p>These changes have taken place following discussions with the affected landowners in order to accommodate new development plans by the landowner, and to accommodate access for drain maintenance respectively.</p> <p>There is no change to the Order Limits in these locations. It has been confirmed that the restriction in powers will have no material impact on the conclusions of the LVIA assessment (APP-083) and as such the effectiveness of the mitigation planting, nor will it have a material impact on the conclusions of the BNG assessment (AS1-014). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics. The change in this small area from landscaping with drainage to drainage is not considered to constitute a change to the project proposed, as it is a reduction in the development proposed in that location which does not alter the conclusions of the ES, and has been made following a request from the affected landowner.</p>

<p>Reductions in the compulsory acquisition rights sought from freehold acquisition to acquisition of permanent rights in respect of certain plots</p>	<p>The documents submitted with the Applicant’s Response to the Rule 17 Letter dated 31 July 2024 included a change in the compulsory rights sought in respect of (i) the access to the OnSS and the proposed bellmouth off Roman Bank (Work No. 20) from freehold acquisition to permanent rights and (ii) the areas which were previously identified for landscaping (Work No. 23) and are now proposed to be used for drainage (Work No. 24) from freehold acquisition to permanent rights.</p> <p>The change from seeking to acquire the freehold to seeking permanent rights is in line with the principles of compulsory acquisition by not seeking greater rights than are necessary. Following discussions with the affected landowners in respect of the accesses, it was concluded that it was not necessary for the Applicant to acquire the freehold to deliver the infrastructure. Following discussions with the affected landowners in respect of the proposed landscaping which resulted in the reduction of the same, it was concluded that freehold acquisition was no longer required over those areas in which landscaping is no longer proposed. It is not considered to constitute a change to the project.</p> <p>In addition, on the basis that the ExA did not request a change notification for similar changes to the compulsory acquisition rights sought following the submission of the Applicant’s Response to the section 51 Advice, the Applicant considered that the ExA was content that such reductions did not constitute a change for which the change notification procedure is engaged.</p>
<p>Changes to documents to account for an additional pipeline crossing</p>	<p>The Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) have been updated following consultation with National Gas Transmission to include an existing pipeline that was not shown previously and which was not on the utilities dataset used for Application. These documents have been updated in order to ensure these plans accurately show all infrastructure to be crossed by the project. This is an update to the factual position on the ground and does not change the proposed project.</p>

Additional changes proposed that have not already been submitted to the ExA

6. In summary, the Applicant intends to make the following further amendments to the application information:
 - (i) changes to documents to account for additional utilities crossings; and
 - (ii) changes to documents to account for additional drain crossings.

7. The Applicant considers that the above changes do not result in changes to the project and therefore do not require to be subject to the change notification procedure set out in the Guidance. The reasons the Applicant reached this conclusion are set out in the table below in respect of these changes:

<p>Changes to documents to account for additional utilities crossings</p>	<p>It has come to the attention of the Applicant that the utilities dataset which was used to produce the Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) did not include a number of assets that will be crossed by the project.</p> <p>The Applicant intends to update the Onshore Crossing Plan and the Onshore Crossing Schedule to ensure these plans show all infrastructure to be crossed by the project. This is an update which reflects the factual position on the ground and does not change the proposed project.</p>
<p>Changes to documents to account for additional drain crossings</p>	<p>It has come to the attention of the Applicant that the Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) did not include certain Internal Drainage Board (“IDB”) assets that will be crossed by the construction access routes for the project.</p> <p>The Applicant intends to update the Onshore Crossing Plan and the Onshore Crossing Schedule to ensure these plans show all IDB assets to be crossed by the project. This is an update which reflects the factual position on the ground and does not change the proposed project.</p>

2 Appendix 2 - The Proposed Changes

For the reasons explained at page 3 above, the Applicant has set out below, in respect of each change, the information required to be included in a change notification, as set out in the Guidance.

2.1 Changes to documents to account for five recently identified proposed Public Rights of Way (“PRoWs”), the proposed diversions to three of those five PRoWs

Information to include in a change notification	Applicant’s Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	The Onshore Crossing Plan (PD1-021), Public Rights of Way Plan (PD1-013) and the Onshore Crossing Schedule (PD1-034) have been updated to show proposed new public rights of way (PRoWs) identified through consultation with Lincolnshire County Council, along with the indicative routes for diversions.
A statement setting out the reasons and need for making the change to the application	These five proposed PRoWs have been added to the above noted plans and documents in order to ensure these plans accurately show all relevant PRoWs that will be in place during project construction. While it has been assessed that two of these PRoWs can be kept open with crossing managed by the Applicant, it will be necessary to temporarily stop up and divert three of these PRoWs during the construction of the project. These PRoWs and their temporary diversions have therefore been added to Schedule 3 (public rights of way to be temporarily stopped up) of the draft DCO (PD1-024). Article 11 of the draft DCO provides the Applicant with the necessary powers to temporarily stop up and divert PRoWs listed in Schedule 3.
A statement establishing whether the proposed change involves changes to the Order land	The proposed change does not involve a change to the Order land. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES) and it has been concluded that these amendments will have no material impact on the conclusions of the assessment set out in the Traffic and Transport Chapter (AS1-052). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	<p>The change can be accommodated within the remaining statutory timescales because:</p> <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and

Information to include in a change notification	Applicant's Response
	<ul style="list-style-type: none"> the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	<p>The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 <u>who would be affected by the proposed change</u>, giving a minimum of 28 days from receipt of the information about the proposed change for responses"</i>(emphasis added).</p> <p>The Applicant proposes to consult on the proposed change with the landowners on whose land the proposed PRowS and the proposed diversions are situated, and Lincolnshire County Council as the Authority responsible for public rights of way, giving a minimum of 28 days for responses.</p>
The expected submission date for the 'change application'.	The Applicant expects to submit the change application at Deadline 2.

2.2 The introduction of the Offshore Restricted Build Area ("ORBA")

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	<p>The introduction of an Offshore Restricted Build Area (ORBA) over the northern section of the array area, comprising an area that is approximately 2km wide at the north-east corner and approximately 3.5km at the north-west corner (see Appendix A, Figure 1.0 of PD1-082). In total, the ORBA covers an area of 71.3km², which represents 16.4% of the array area.</p> <p>Requirement 4, Part 3 of Schedule 1 of the draft DCO (PD1-024) and condition 1, Part 2 of the deemed marine licences forming Schedules 10 and 11 of the draft DCO have been updated to provide that no WTGs or OPs will be installed in the ORBA, the co-ordinates for which are set out in the said requirement and conditions. However, the area may be used for cable installation and ancillary operations during construction (and decommissioning) and operations and maintenance works. Project parameters including number of structures, foundation types, and cable parameters will remain unchanged and no change is being proposed to the extent of the array area, as defined within the draft Development Consent Order.</p>

Information to include in a change notification	Applicant's Response
<p>A statement setting out the reasons and need for making the change to the application</p>	<p>In response to concerns raised by stakeholders regarding the high numbers of birds to the north of the array area, the proposed ORBA has been introduced to reduce the impact from the presence of the WTGs (and offshore platforms) on auk species (specifically common guillemot and razorbill).</p> <p>The introduction and size of the ORBA has been made possible through continued engagement with the relevant oil and gas operators who have interests which overlap with the project, i.e. due to the presence of oil and gas platforms within or adjacent to the array area. Since the Application, the Applicant has been able to agree the principles for co-existence between the project and access arrangements to the Malory platform with Perenco, specifically for helicopter transfers to and from this platform. Confidence in the likely final protective provisions for this operator within the DCO for the project has therefore allowed further engineering work to be undertaken to support additional mitigation of the impact to auk species through a reduction in the area within which WTGs and OPs may be placed.</p> <p>The introduction of the ORBA has resulted in a reduction in the summed mean seasonal peak abundance of guillemot from 27,653.3 birds in the array area plus 2 km buffer (Appendix 12.1 Offshore and Intertidal Ornithology Technical Baseline (AS1-064)) to a summed mean seasonal peak abundance of 23,586 guillemot in the array area minus the ORBA plus 2km buffer (Appendix 15.9D).</p> <p>The limits of the ORBA have been defined based on environmental considerations to ensure that the project minimises environmental impacts as far as practicable whilst also retaining the required flexibility to ensure deliverability and meeting the defined project objectives, including making a large contribution to UK decarbonisation targets (7.5 Derogation Case APP-242).</p> <p>There is no change to the previously defined minimum or maximum criteria for the WTGs or OSPs within the Project Description (APP-058), with the maximum number of structures remaining at 100 WTGs, four offshore substations (OSSs) and one accommodation platform.</p> <p>There is no change to the previously defined areas for the biogenic reef and artificial nesting structure (ANS) compensation areas.</p>
<p>A statement establishing whether the proposed change involves changes to the Order land</p>	<p>The proposed changes do not involve changes to the Order land. The Order Limits of the array area remain as previously set out. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.</p>

Information to include in a change notification	Applicant's Response
<p>A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects</p>	<p>The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES) and the Report to Inform Appropriate Assessment (RIAA). The assessment in relation to the conclusions of the ES is set out in the Environmental Report for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (PD1-081). The assessment in relation to the conclusions of the RIAA is set out in the Habitats Regulations Assessment for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (PD1-091). The conclusions of these reports are that the proposed change will have no effect on the overall conclusions drawn within the ES or RIAA.</p>
<p>Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales</p>	<p>The change can be accommodated within the remaining statutory timescales because:</p> <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and • this change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
<p>The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification</p>	<p>The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 <u>who would be affected by the proposed change</u>, giving a minimum of 28 days from receipt of the information about the proposed change for responses"</i>(emphasis added).</p> <p>The Applicant has consulted with all relevant prescribed consultees, being the Marine Management Organisation, Natural England, the Maritime and Coastguard Agency and Trinity House on the proposed change. In addition to prescribed consultees, the Applicant has also consulted with the Chamber of Shipping. Details of that consultation are set out in Table 3.1 of both Documents PD1-081 and PD1-091. It should be noted that the Maritime and Coastguard Agency, Trinity House and the Chamber of Shipping have all confirmed that this is a positive change from a shipping and navigation perspective.</p> <p>As a result, the Applicant's position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.</p>

Information to include in a change notification	Applicant's Response
The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

2.3 Revision to the Offshore Export Cable Corridor

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	<p>The northern section of the offshore Export Cable Corridor (ECC) within the inshore area has been removed from the Order Limits. In addition, a minor amendment has been made to the ORCP area within the southern route to exclude an area at the eastern extent.</p> <p>The total maximum offshore export cable lengths, number of cables, number of ORCPs and all other parameters remain, as provided within the DCO Application.</p>
A statement setting out the reasons and need for making the change to the application	<p>The offshore ECC presented within the Environmental Statement (ES) that supported the DCO Application included two routeing options within the inshore area of the cable route, a northern and a southern route. The northern route was included as it is situated north of the Inner Dowsing sandbank and thus avoided impacts to this designated feature. The southern route was also included as the northern route passes through aggregates Area 1805 which has an Exploration and Option area agreement with The Crown Estate, although this was due to expire on 31st August 2024. In the event that the option agreement was not taken up by the holder, this seabed area would have become available to the project, thus allowing the project to avoid crossing the Inner Dowsing sandbank.</p> <p>It has now been confirmed that the option on this area has been extended by TCE until 2025 (pers. comms. Hansons via email 1st May 2024), with a Marine Licence Application (MLA/2024/00227) having been made by the agreement holder on 25th April 2024 to permit aggregates extraction within the site for a period of 15 years. As such, it is clear that the agreement holder intends to take up the option over this area of the seabed for aggregate extraction, and therefore it is no longer a viable option for the project to pursue. Consequently, the project has excluded the northern route from the offshore ECC and is amending the Order Limits to exclude this section of the offshore ECC from the draft DCO.</p> <p>The minor amendment to the ORCP location within the southern route has been made as it would not be technically feasible to</p>

	install the structures whilst meeting the minimum bend radii requirements for the offshore export cables.
A statement establishing whether the proposed change involves changes to the Order land	The proposed change involves a reduction to the Order land offshore. One of the options included within the application Order land for the offshore ECC and ORCPs has been removed from the Order land as a result of the proposed change. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES) and the Report to Inform Appropriate Assessment (RIAA). The assessment in relation to the conclusions of the ES is set out in the Environmental Report for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (PD1-081). The assessment in relation to the conclusions of the RIAA is set out in the Habitats Regulations Assessment for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (PD1-091). The conclusions of these reports are that the proposed change will have no effect on the overall conclusions drawn within ES or RIAA.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	The change can be accommodated within the remaining statutory timescales because: <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and • the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 <u>who would be affected by the proposed change, giving a minimum of 28 days from receipt of the information about the proposed change for responses</u>"</i> (emphasis added). The Applicant has consulted with all relevant prescribed consultees, being the Marine Management Organisation, Natural England, the Maritime and Coastguard Agency and Trinity House on the proposed change. In addition to prescribed consultees, the Applicant has also consulted with the Chamber of Shipping. Details of that consultation is set out in Table 3.1 of both Documents PD1-081 and PD1-091. It should be noted that the

	<p>Maritime and Coastguard Agency, Trinity House and the Chamber of Shipping have all confirmed that this is a positive change from a shipping and navigation perspective.</p> <p>As a result, the Applicant's position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.</p>
The expected submission date for the 'change application'	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

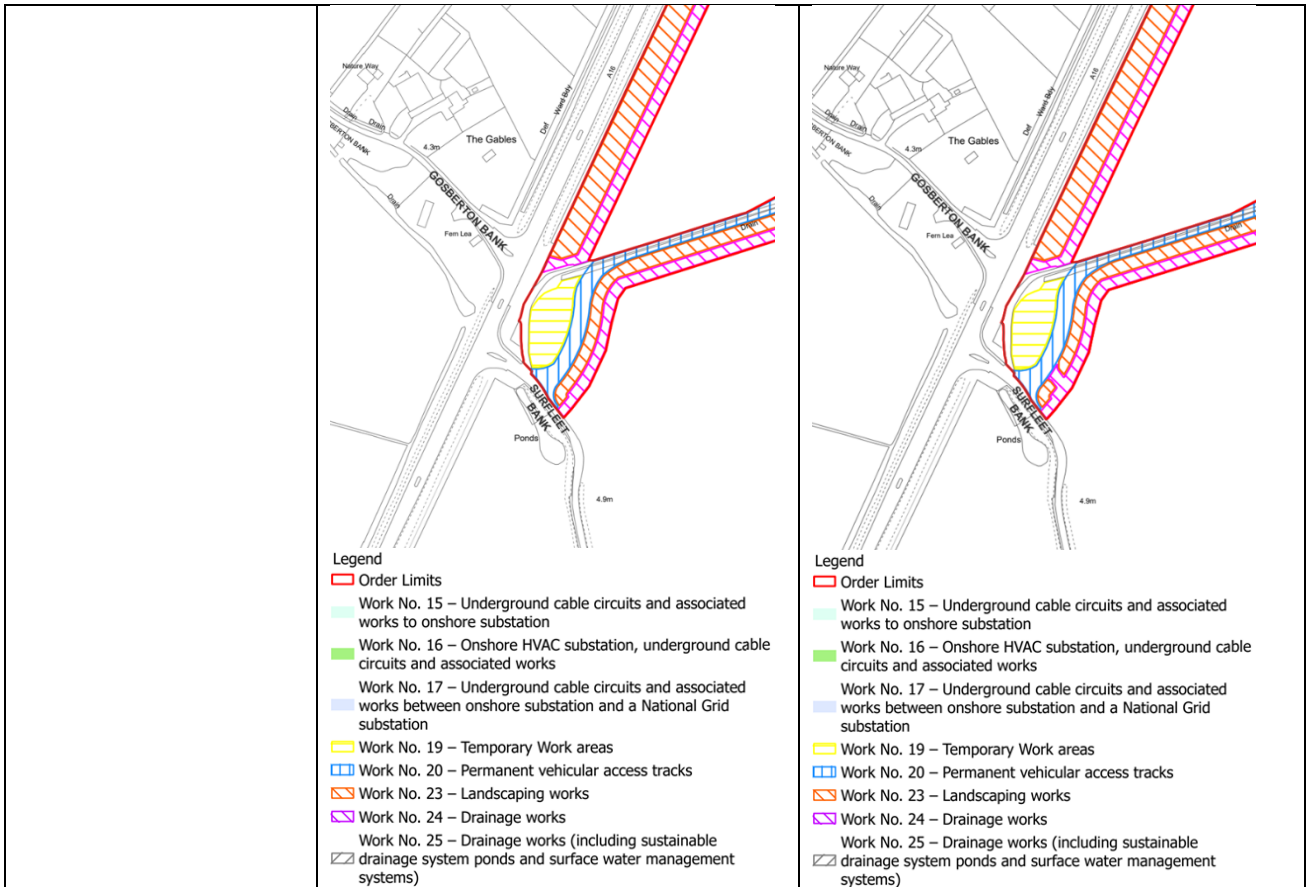
2.4 Onshore Order Limit reductions - removal of unnecessary plots

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	The Applicant has removed plots 35-004, 35-005, 35-006, 35-007, 35-008, 46-048 from the Order land and reduced the extent of plot 46-045 as these plots relate to accesses which have been removed at the request of the affected landowners and are therefore no longer required. Schedule 9 of the draft DCO (PD1-024) has therefore been updated to reflect this.
A statement setting out the reasons and need for making the change to the application	This change removes certain accesses which, following further design refinement and consultation with landowners, have been assessed as no longer being required to construct, operate, maintain or decommission the project. These accesses have therefore been removed from the Order Limits.
A statement establishing whether the proposed change involves changes to the Order land	The proposed change involves a reduction to the Order land onshore. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES) and it has been concluded that there would be no change in the assessment conclusions of the ES for any onshore environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	<p>The change can be accommodated within the remaining statutory timescales because:</p> <ul style="list-style-type: none"> the proposed change would not generate new or different likely significant environmental effects; the proposed change would not require additional compulsory acquisition powers; and

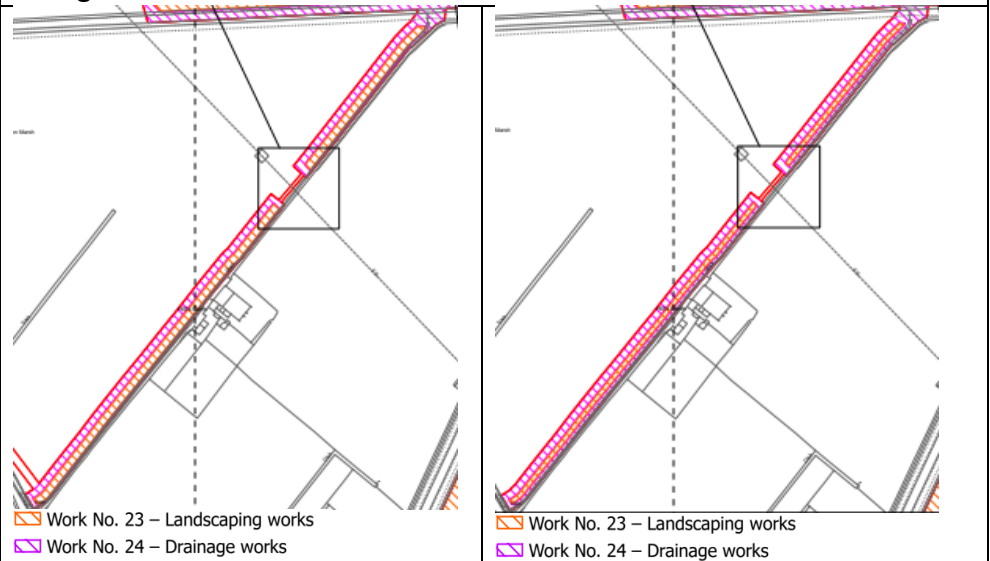
	<ul style="list-style-type: none"> the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	<p>The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 <u>who would be affected by the proposed change</u>, giving a minimum of 28 days from receipt of the information about the proposed change for responses"</i>(emphasis added).</p> <p>The Applicant has made these changes at the request of the affected landowners following consultation with them on the proposed development. Given the change results in a reduction of the Order limits and no new or different likely significant effects, and there is no additional land affected, the change does not appear to affect the functions of statutory consultees, or other parties, beyond the affected landowners. As a result, the Applicant's position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.</p>
The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

2.5 Onshore Order Limit amendments - change from landscaping works to drainage works

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	The work number within a small area of the Order Limits around the access from the A16 to the OnSS has been amended to replace previously included screening planting (which included drainage rights) with drainage rights (Work No. 23 to Work No. 24) east of the A16 at Surfleet Bank. The plans below show an extract of this area on the Works Plans Onshore version 2 (AS1-004) on the left and on the Works Plans Onshore version 3 (PD1-004) on the right in order to demonstrate this change.



In addition, the width of the screen planting west of the A16 has been reduced from 10 metres to 6 metres, with the area which previously included screening planting now amended to drainage rights (Work No. 23 to Work No. 24). The plans below show an extract of this area on the Works Plans Onshore version 2 (AS1-004) on the left and on the Works Plans Onshore version 3 (PD1-004) on the right in order to demonstrate this change.



A statement setting out the reasons and need for making the change to the application	These changes have taken place following further design refinement and discussions with the affected landowners in order to accommodate new development plans by the landowner, and to accommodate access for drain maintenance respectively (by ensuring the landowner has access to the ditch for maintenance and jetting of land drains).
A statement establishing whether the proposed change involves changes to the Order land	The proposed change does not involve a change to the Order land. The change amends the Works numbers within the Order land at these locations, but the Order Limits remain unchanged. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES) and it has been concluded that these amendments will have no material impact on the conclusions of the LVIA assessment (APP-083) and as such the effectiveness of the mitigation planting, nor will it have a material impact on the conclusions of the BNG assessment (AS1-014). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	<p>The change can be accommodated within the remaining statutory timescales because:</p> <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and • the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	<p>The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 who would be affected by the proposed change, giving a minimum of 28 days from receipt of the information about the proposed change for responses"</i>(emphasis added).</p> <p>The Applicant has made these changes at the request of the affected landowners following consultation with them on the proposed development.</p> <p>Given the changes result in only small changes to the nature of the works to be carried out within the Order Limits at these discreet locations, the change does not appear to affect the functions of statutory consultees, or other parties, beyond the affected landowners. As a result, the Applicant's position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.</p>

The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).
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2.6 Reductions in the compulsory acquisition rights sought from freehold acquisition to acquisition of permanent rights in respect of certain plots

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	<p>A number of plots have been added to schedule 7 of the draft DCO (PD1-024) as the Applicant has, following consultation with the affected landowners, agreed not to seek compulsory acquisition powers to acquire the freehold, and is now proposing to acquire permanent rights.</p> <p>As a result of the change to the work number referred to in table 1.5 above around the access from the A16 to the OnSS, the area that was previously identified as Work No. 23 and is now Work No. 24 has been removed from what was Plot 46-006 (over which rights to acquire the freehold was sought), and now forms part of Plot 47-007 (over which rights to acquire permanent rights is sought). Plot 47-007 was already included in Schedule 7 of the draft DCO, but the land included in that plot has been extended.</p> <p>As a result of the change referred to in Table 1.5 above which reduced the width of an area of screen planting, Plots 46-037 and 46-044 have been reshaped and reduced to reflect a reduction in the width of the proposed landscaping area from 10m to 6m. Plots 46-037a and 46-044a have been created to replace these previous landscaping areas in respect of which freehold acquisition was sought and instead permanent drainage rights are being sought. Plots 46-037a and 46-044a have therefore been added to Schedule 7.</p> <p>Freehold acquisition was previously sought over plots 01-011, and 01-012 in respect of the bellmouth off Roman Bank, and over Plots 47-006, 47-008, 47-009 in respect of the permanent access to the OnSS, however the Applicant is now seeking permanent rights in respect of these plots in response to requests from the respective landowners following engagement. These plots have therefore been added to Schedule 7.</p> <p>Plot 45-041, in respect of which freehold acquisition is sought, has been reshaped and reduced to reflect a requested change in acquisition type for the access track which formed part of the plot. Plot 45-041 has been retained as freehold acquisition but the part of plot 45-041 comprising the access track has become plot 45-041a and permanent rights are now sought over that area</p>

	instead of freehold acquisition. Plot 45-041a has therefore been added to Schedule 7.
A statement setting out the reasons and need for making the change to the application	These changes have taken place following further design refinement and discussions with the affected landowners regarding what rights they would be willing to grant to the Applicant on a voluntary basis. The Applicant has agreed to only take permanent rights over certain plots on a voluntary basis, and as such is no longer seeking to acquire the freehold (which would be a greater interference with the landowners' rights) on a compulsory basis.
A statement establishing whether the proposed change involves changes to the Order land	The proposed changes do not involve a change to the Order land. The change amends the compulsory acquisition powers sought in respect of those plots referred to above, but the Order Limits remain unchanged. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	As the change relates only to the type of compulsory acquisition powers sought, this does not result in any change to the assessment conclusions of the Environmental Statement (ES).
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	The change can be accommodated within the remaining statutory timescales because: <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and • the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 <u>who would be affected by the proposed change</u>, giving a minimum of 28 days from receipt of the information about the proposed change for responses"</i> (emphasis added). The Applicant has made these changes at the request of the affected landowners following consultation with them on the proposed development. Given the change relates only to the type of compulsory acquisition powers sought, the change does not appear to affect the functions of statutory consultees, or other parties, beyond

	the affected landowners. As a result, the Applicant's position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.
The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

2.7 Changes to documents to account for an additional pipeline crossing

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	The Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) have been updated following consultation with National Gas Transmission to include a pipeline (Crossing ID UUX-250a) that was not shown previously and which was not on the utilities dataset used for Application.
A statement setting out the reasons and need for making the change to the application	These documents have been updated in order to ensure these plans accurately show infrastructure to be crossed by the project. This is an update, which reflects the factual position on the ground and does not change the proposed project.
A statement establishing whether the proposed change involves changes to the Order land	The proposed change does not involve a change to the Order land. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the ES and it has been concluded that these amendments will have no material impact on the conclusions of the Land Use Chapter (AS1-050). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	The change can be accommodated within the remaining statutory timescales because: <ul style="list-style-type: none"> the proposed change would not generate new or different likely significant environmental effects; the proposed change would not require additional compulsory acquisition powers; and the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope	The Planning Inspectorate's Guidance "Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination" provides that: <i>"The applicant should consult all those persons prescribed under section 42(1)(a)</i>

of that consultation, including justification	<p>to (d) of the Planning Act 2008 <u>who would be affected by the proposed change</u>, giving a minimum of 28 days from receipt of the information about the proposed change for responses”(emphasis added).</p> <p>The Applicant’s view is that National Gas Transmission – who made the Applicant aware of the omission in the relevant plan – is the only statutory consultee who would be affected by the proposed change in their capacity as the gas undertaker for the additional pipeline. Given the change has been made to ensure accurate information has been provided in the application documents, the Applicant’s position is that no further consultation with additional persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 is required and that all necessary consultation has taken place.</p>
The expected submission date for the ‘change application’.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

2.8 Changes to documents to account for additional utilities crossings

Information to include in a change notification	Applicant’s Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	<p>It has come to the attention of the Applicant that the utilities dataset which was used to produce the Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) did not include a number of assets that will be crossed by the project. The additional crossings relate to:</p> <ul style="list-style-type: none"> • 8 underground utilities owned by Anglian Water Services; • 1 underground utility owned by National Grid Electricity Distribution; • 1 overhead utility owned by National Grid Electricity Distribution; and • 2 underground utilities owned by Openreach.
A statement setting out the reasons and need for making the change to the application	The Applicant intends to update the Onshore Crossing Plan and the Onshore Crossing Schedule to ensure these plans show all infrastructure to be crossed by the project. This is an update which reflects the factual position on the ground and does not change the proposed project.
A statement establishing whether the proposed change involves changes to the Order land	The proposed change does not involve a change to the Order land. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the ES and it has been concluded that these amendments will have no material impact on the conclusions of

likely significant environmental effects	the Land Use Chapter (AS1-050). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	The change can be accommodated within the remaining statutory timescales because: <ul style="list-style-type: none"> the proposed change would not generate new or different likely significant environmental effects; the proposed change would not require additional compulsory acquisition powers; and the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	The Applicant strongly considers that no consultation is necessary on this change, as it results in no new or different environmental effects, and does not require additional land to be included within the Order limits. However, should the ExA disagree, the Applicant considers any consultation should be limited to only those owners of the newly identified assets (being Anglian Water Services, National Grid Electricity Distribution and Openreach).
The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

2.9 Changes to documents to account for additional drain crossings

Information to include in a change notification	Applicant's Response
A clear description of the proposed change, including any new works, altered works and ancillary matters	It has come to the attention of the Applicant that the Onshore Crossing Plan (PD1-021) and the Onshore Crossing Schedule (PD1-034) did not include certain IDB assets that will be crossed by the construction access routes for the project. The IDB assets are: <ul style="list-style-type: none"> Five Towns Drain sluice, owned by Welland and Deepings IDB; Risegate Eau sluice, owned by Welland and Deepings IDB; Wragg Marsh Drain sluice, owned by South Holland IDB; and Lord's Drain, owned by South Holland IDB.
A statement setting out the reasons and need for making the change to the application	The Applicant intends to update the Onshore Crossing Plan and the Onshore Crossing Schedule to ensure these plans show all IDB assets to be crossed by the project. This is an update which reflects the factual position on the ground and does not change the proposed project.

A statement establishing whether the proposed change involves changes to the Order land	The proposed change does not involve a change to the Order land. The change does not involve a request to include additional compulsory acquisition powers therefore the procedures in regulations 5 to 19 of the CA Regulations do not apply.
A statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the ES and it has been concluded that these amendments will have no material impact on the conclusions of the Land Use Chapter (AS1-050). The Applicant can confirm this will also not result in a change in the assessment conclusions of the Environmental Statement (ES) for any other environmental topics.
Information to establish how the applicant considers the change to the application can be accommodated within the remaining statutory timescales	<p>The change can be accommodated within the remaining statutory timescales because:</p> <ul style="list-style-type: none"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; and • the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.
The timescale for the applicant's consultation about the proposed change, and the applicant's view on the scope of that consultation, including justification	The Applicant strongly considers that no consultation is necessary on this change, as it results in no new or different environmental effects, and does not require additional land to be included within the Order limits. However, should the ExA disagree, the Applicant considers any consultation should be limited to only those owners of the newly identified IDB assets (being Welland and Deepings IDB and South Holland IDB).
The expected submission date for the 'change application'.	The Applicant expects to submit any change application required at Deadline 1 (on the assumption that the ExA agree that no further consultation is required).

3 Appendix 3 – Schedule of Documents submitted on 19 September

3.1 Introduction

1. This Schedule has been prepared in response to the ExA’s request that the Applicant submits a schedule detailing the following:
 - a. *“Which of the suite of documents submitted by the Applicant on 19 September 2024 represent either new evidence or revisions to existing evidence submitted as part of the original application, and which make no reference at all to any of the proposed changes (ie. the ORBA/revised ECC/recently identified public rights of way and an additional pipeline crossing/reduction in areas of land or rights required)”*. These documents are referred to in the below table as **Group 1**.
 - b. *“Which of the suite of documents submitted by the Applicant on 19 September 2024 refer, either directly or indirectly, to any of the proposed changes (either offshore or onshore) and which would therefore represent either new evidence or revisions to existing evidence submitted as part of the original application if accepted by the ExA following a formal Change Request by the Applicant”*. These documents are referred to in the below table as **Group 2**.
2. As requested, all the documents listed within **Group 2** “refer, either directly or indirectly” to proposed changes. However, to assist the ExA, these documents have been further divided into **Group 2A** (documents to which the change is integral) and **Group 2B** (documents to which the change is incidental, such as where it has led to an update to a figure only or a minor textual change). We hope this is of assistance.

3.2 Schedule of Documents submitted on 19 September

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
GROUP 1: Documents submitted by the Applicant on 19 September 2024 which represent either new evidence or revisions to existing evidence submitted as part of the original application, and which make no reference at all to any of the proposed changes		
PD1-038 – PD1-039 (8.1*)	Outline Code of Construction Practice	This Outline Plan has been updated to add references to the Water Quality Management and Mitigation Plan, in response to Relevant Representations (“RRs”) and does not refer to the proposed changes.
PD1-040 – PD1-041 (8.1.3*)	Outline Soil Management Plan	This Outline Plan has been amended to reflect input from stakeholders through RRs and does not refer to the proposed changes
PD1-042 – PD1-043 (8.5*)	Outline Cable Specification and Installation Plan	Changes made to this document reflect commitments made as a result of RRs and do not refer to the proposed changes.
PD1-046 – DP1-047 (8.6.2*)	Outline Marine Mammal Mitigation Protocol (UXO)	Changes made to this document reflect commitments made as a result of RRs and do not refer to the proposed changes.
PD1-052 – PD1-053 (8.9)	Outline Onshore Archaeological Written Scheme of Investigation	This Outline Plan has been amended to reflect input from stakeholders through RRs and does not refer to the proposed changes.
PD1-054 – PD1-057 (8.10*)	Outline Landscape and Ecological Management Strategy	This Outline Plan has been amended to reflect input from stakeholders through RRs and does not refer to the proposed changes.
PD1-066 – PD1-067 (8.22*)	Outline Biogenic Reef Mitigation Plan	This Outline Plan has been amended to reflect consultation conducted and the inclusion of the Envision report (15.13; PD1-095) (discussed below) from stakeholders through RRs. It does not refer to the proposed changes.
PD1-074 (15.6)	Erratum to Site Selection Report	This document has been provided to address comments made in RRs. The analysis of the onshore Export Cable Corridor route which it provides is not based on the proposed changes.
PD1-075 – PD1-079 (15.7; 15.7A)	Noise Bund Hydraulic Modelling Report and Appendices	Following the completion of required modelling, this document provides information to address comments made by the Environment Agency in pre-examination consultation. The document does not make any reference to any proposed changes.
PD1-080 (15.8)	Onshore Archaeological Geophysical Report	Following the completion of surveys and analysis, this document was submitted to present geophysical findings for the Applicant’s onshore cable connection to provide further

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
		clarification of the subsurface archaeological potential of the area. It does not contain any references to proposed changes.
PD1-093 (15.11)	Additional clarifications relating to Natural England's Relevant Representations (Appendix I Onshore Ornithology)	This document has been provided to give the ExA notice of additional clarifications provided to Natural England in response to its RRs and does not refer to the proposed changes.
PD1-094 (15.12)	iPCoD Interim Population Consequences of Disturbance Modelling Report	This document provides information which the Applicant committed to providing in Table 1.2 of the Applicant's Response to the Rule 17 Letter dated 3 July 2024 (AS-013 in response to PD-005) and does not contain any references to proposed changes.
PD1-096 (15.14)	Addendum to RIAA: Onshore Ornithology	This document has been provided to address comments made in RRs. It does not refer to proposed changes.
PD1-098 (15.16)	Collaborative Delivery of Kittiwake Compensation: Letter of Intent	Letters have been submitted regarding certain compensation measures to inform the ExA about the Applicant's progress and do not contain any references to proposed changes.
PD1-099 (15.17)	Letter From Jersey Government: Anti-Predator Fence East of Plémont, Jersey, Channel Islands.	
PD1-100 (15.18)	Draft Statement of Commonality	This document responds to ExA requests for its submission in the Rule 6 Letter (PD-009) and does not contain any references to proposed changes.

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
<p>GROUP 2: Documents submitted by the Applicant on 19 September 2024 which refer, either directly or indirectly, to any of the proposed changes (either offshore or onshore) and which would therefore represent either new evidence or revisions to existing evidence submitted as part of the original application if accepted by the ExA following a formal Change Request by the Applicant.</p> <p>Note: All the below documents “refer, either directly or indirectly” to proposed changes. To assist the ExA’s consideration of these documents, they have been further divided into Group 2A (documents to which the change is integral) and Group 2B (documents to which the change is incidental, such as where it has led to an update to a Figure only or a minor textual change). Group 2A documents have been divided to make clear where the proposed change is either “onshore” or “offshore” or where the relevant document is a general Application document and the changes discussed relates to both onshore and offshore.</p>		
<p>Group 2A: Documents to which the changes are integral</p>		
<p>Group 2A General Application documents to which the changes are integral</p>		
PD1-003 (2.0)	Schedule of Changes for Plans	The Schedule of Changes for Plans was updated to articulate both the offshore and onshore changes referred to in the ExA’s Procedural Decision (PD-010) as discussed in Appendix 2 of this submission.
PD1-024 – PD1-025 (3.1*)	Draft Development Consent Order	A number of changes have been made to the Development Consent Order and Statement of Reasons to reflect the proposed introduction of the Offshore Restricted Build Area (“ ORBA ”), the revision to the Offshore Export Cable Corridor (“ ECC Revision ”) and onshore changes (minor changes due to small reductions to the areas of land required and amendments to the rights sought) and changes to documents to account for recently identified proposed Public Rights of Way (“ PRoWs ”) and an additional pipeline crossing.
PD1-026 (3.1.1.)	Schedule of Changes to the Draft DCO	
PD1-032 – PD1-033 (4.3*)	Statement of Reasons	

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
Group 2A documents to which the changes are integral related to offshore changes: the introduction of the ORBA and the ECC Revision		
PD1-005 (2.2)	Works Plans Offshore	Updates to offshore Plans were made to reflect the ORBA inclusion and ECC Revision.
PD1-007 (2.4)	Location Plan Offshore	
PD1-010 (2.7)	Crown Land Plans Offshore	
PD1-011 (2.8)	Offshore Order Limits and Grid Coordinates Plan	
PD1-017 (2.14)	Historic Environment Plan Offshore	
PD1-019 (2.16)	Statutory and Non-Statutory Nature Conservation Sites Plan Offshore	
PD1-022 (2.19)	Offshore Crossing Plan	
PD1-044 – PD1-045 (8.6.1*)	Outline Marine Mammal Mitigation Protocol (Piling)	Remodelling related to this Outline Plan was conducted as a result of the inclusion of the ORBA and ECC Revision.
PD1-050-PD1-051 (8.8*)	Outline Marine Archaeological Written Scheme of Investigation	As a result of the ECC Revision, the assessment and mitigation sections of this document have been updated to reflect the smaller area of seabed which could be affected. The inclusion of the ORBA and ECC Revision is reflected in updates to figures.

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
PD1-081 - PD1-090 (15.9; 15.9A-H)	Environmental Report for Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor and Appendices	The Applicant has prepared documents 15.9 – 15.10 and appendices (PD1-081-PD1-092) in support of the introduction of the ORBA and ECC Revision. As discussed in PD1-001, the ORBA and ECC Revision Reports and Appendices also provide re-calculated values – based on the assumption that the ORBA and ECC Revisions are accepted - for Natural England’s position for ornithological impacts, which were committed to in Table 1.2 of the Applicant’s Response to the Rule 17 Letter dated 3 July 2024 (AS-013 in response to PD-005).
PD1-091-PD1-092 (15.10; 15.10A)	Habitats Regulations Assessment for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor and Appendix	
PD1-097 (15.15)	Disposal Site Characterisation Report	The purpose of this document is to describe the Applicant’s proposed disposal sites and identify where in the application the effects of disposal on such sites are assessed and summarise those effects. It makes reference to and takes into account the proposed inclusion of the ORBA and ECC Revision.
Group 2A documents to which the changes are integral related to onshore changes: minor changes due to small reductions to the areas of land required and amendments to the rights sought and changes to documents to account for recently identified proposed PRoWs and an additional pipeline crossing.		
PD1-004 (2.1)	Works Plans Onshore	Updates were made to these Plans to include reduction in landscaping areas and replacement of the work type undertaken in those areas to drainage rights, and updates to Order Limits.
PD1-006 (2.3)	Location Plan Onshore	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-008 (2.5)	Land Plans	Updates were made to this Plan to reflect proposed reductions in order limits and reduction in rights sought.

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
PD1-009 (2.6)	Crown Land Plans Onshore	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-012 (2.9)	Access to Works Plan	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-013 (2.10)	Public Rights of Way Plan	Updates were made to this Plan to reflect proposed reductions in order limits and inclusion of recently identified proposed PRowWs.
PD1-014 (2.11)	Streets Plan	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-015 (2.12)	Special Category Land Onshore	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-016 (2.13)	Historic Environment Plan Onshore	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-018 (2.15)	Statutory and Non-Statutory Nature Conservation Sites Plan Onshore	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-020 (2.17)	Important Hedgerows and Tree Preservation Order Plan	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-021 (2.18)	Onshore Crossing Plan	Updates were made to this Plan to reflect proposed reductions in order limits, the inclusion of recently identified proposed PRowWs and an additional pipeline crossing.
PD1-023 (2.20)	Traffic Regulation Order Plan	Updates were made to this Plan to reflect proposed reductions in order limits.
PD1-029 – PD1-030 (4.1*)	Book of Reference	A number of changes have been made to the Book of Reference to reflect the following onshore changes: minor changes due to small reductions to the areas of land required and amendments to the rights sought and changes to documents to account for a recently identified additional pipeline crossing.
PD1-031 (4.1.1)	Schedule of Changes to the Book of Reference	
PD1-034 – PD1-035 (6.3.3.2*)	Chapter 3 Appendix 2: Onshore Crossing schedule	This schedule has been updated to show the presence of the pipeline and proposed PRowWs described above.
PD1-062 – PD1-063 (8.17*)	Outline Public Access Management Plan	Updates were made to this Plan to reflect proposed reductions in order limits and inclusion of recently identified proposed PRowWs.

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
Group 2B: Documents to which the changes are incidental (i.e. where it has resulted in the changes to a figure or plan or brief reference to the change)		
Group 2B General Application documents to which the changes are incidental		
PD1-002 (1.2)	Guide to Application	The Guide to Application has been updated to reflect the new and updated documents provided in response to this Procedural Deadline. Though its primary purpose is to list application documents and identify their current versions, by referencing documents such as the ORBA and ECC Revision suite of documents (15.9, 15.10, and appendices; PD1-081-PD1-092) it refers indirectly to the proposed changes.
PD1-027-PD1-028 (3.2*)	Explanatory Memorandum	This document responds to ExA requests for its submission in the Rule 6 Letter (PD-009). It references the presence of the ORBA at paragraph 10.10.
PD1-058 – PD1-059 (8.13*)	Schedule of Mitigation	The Schedule of Mitigation has been updated primarily to reflect the additional commitments now included in Outline Plans and draft DCO in response to points raised in RRs. The updates to mitigations include reference to the inclusion of the ORBA area on the basis that this provides auk species mitigation.
PD1-068 – PD1-069 (9.2*)	Cable statement	This Statement was updated to include a new figure which shows the presence of the ORBA and amends the red line boundary in line with the ECC Revision. Small textual inclusions were made to explain why the northern route had been removed. Otherwise, the document was unchanged.
PD1-070 (15.2)	The Applicant's Response to the Rule 17 Letter dated 31 July 2024	This document responds to ExA requests made in its Rule 17 letter dated 31 July 2024 (PD-006). However, it refers to the fact that the Applicant has submitted the ORBA and ECC Revision suite of documents (Docs 15.9 and 15.10 and appendices, PD1-081-PD1-092) and in this respect, it refers to a proposed change.
PD1-071 (15.3)	Applicant's Responses to Relevant Representations	This document's primary purpose is to respond to RRs made by IPs. However, in providing these responses it has made some reference to proposed changes (for example, see ORBA and ECC Revision discussion at RR-011.002 – RR-011.003).

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
PD1-073 (15.5)	Pre-Examination Principal Issues Progress Tracker	This document was requested by the ExA and tracks Principal Issues between the Applicant and IPs. It refers to the ORBA suite of documents, and in this respect makes indirect references to the changes proposed.
PD1-101 (15.19)	The Applicant's Response to Transboundary Consultation Responses	This document sets out responses to comments which accompanied requests to participate in the Examination process by European Economic Area Member States ("MS") on the basis of possible transboundary impacts. Though its purpose does not relate to any of the changes, in one place it references the ORBA when setting out the positive reception to its inclusion by an offshore stakeholder.
Group 2B documents to which the changes are incidental related to offshore changes: the introduction of the ORBA and the ECC Revision		
PD1-048 – PD1-049 (8.7*)	In Principle Southern North Sea Special Area of Conservation Site Integrity Plan	This Plan was updated to include a new figure which shows the presence of the ORBA and amends the red line boundary in line with the ECC Revision. Otherwise, it is unchanged.
PD1-060 – PD1-061 (8.14*)	Outline Fisheries Liaison and Co-existence Plan	This Outline Plan has been amended to reflect input from stakeholders through Relevant Representations however the ORBA inclusion and the ECC Revision are reflected in figure changes and the ORBA is referenced in two text changes.
PD1-064 – PD1-065 (8.20*)	Outline Vessel Management Plan	This Outline Plan has been amended to reflect input from stakeholders through Relevant Representations however the ORBA inclusion and the ECC Revision are reflected in figure changes.
PD1-095 (15.13)	Envision Sabellaria Spinulosa Reanalysis and Report	This document provides information which the Applicant committed to providing in Table 1.2 of the Applicant's Response to the Rule 17 Letter dated 3 July 2024 (AS-013 in response to PD-005). The analysis contained within this document is unchanged by the ECC Revision or ORBA but Figures within the document have been updated to reflect the change in Order Limit by the ECC Revision and added hatching caused by the inclusion of the ORBA.

Reference	Document Title	Reason for submission and explanation of whether proposed changes are referred to
Group 2B documents to which the changes are incidental related to onshore changes: minor changes due to small reductions to the areas of land required and amendments to the rights sought and changes to documents to account for recently identified PRoWs and an additional pipeline crossing.		
PD1-036 – PD1-037 (6.3.24.2*)	Chapter 24 Appendix 2 Flood Risk Assessment ECC & 400kV Cable Corridor	This Appendix has been updated primarily to address comments made in RRs. However, on the basis that it includes figures showing the Project’s red line boundary it makes indirect reference to the proposed reduction to order limits.
PD1-072 (15.4)	Compulsory Acquisition and Land Tracker	This document was requested by the ExA in its Rule 17 Letter dated 31 July (PD-006). Though its primary purpose does not relate to the changes, the description of relevant land rights has been updated to reflect the reduction in rights sought. For instance, where freehold rights were previously sought in relation to the substation access and this has been reduced to permanent rights being taken, this is reflected in the document.
*indicates that clean and tracked versions have been provided		