

# Outer Dowsing Offshore Wind

## The Applicant's Change Notification dated 27 November 2024

### Deadline 2

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27 November 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  
Change Notification  
Application Reference: EN010130**

The Applicant refers to the Planning Inspectorate’s Guidance “Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination” (“**the Guidance**”).

The Applicant notes that, under the heading “New or revised information”, the Guidance explains that changes to application information may not necessarily result in changes to the proposed project. As an example of updates which may not fall into the category of a formal change which requires to follow the change process, the Guidance lists “*new information in response to the Examining Authority’s written questions*”. The Applicant notes the question raised by the Examining Authority (“**ExA**”) at Q1 HRA 2.4 which requests that the Applicant, Natural England and the Royal Society for the Protection of Birds (“**RSPB**”) comment on the recent decision by the Secretary of State to accept a non-material change request to the Hornsea Four Offshore Wind Farm Development Consent Order (SI 2023/800). The non-material change to the Hornsea Four DCO sought to amend the Order to reduce the length of time the proposed artificial nesting structure for kittiwake needs to be in place before operation of the project from four full breeding seasons to two full breeding seasons.

The Applicant proposes to make a similar amendment to the Outer Dowsing Offshore Wind Farm Order. The proposed update is an amendment to the Order to reduce the length of time the proposed artificial nesting structure(s) needs to be in place before operation of the project from three full kittiwake breeding seasons to two full kittiwake breeding seasons. Whilst the Applicant considers that such an amendment may fall within the categories of update that do not constitute a change to the Order, the Applicant is mindful that the ExA may take a different view. Therefore, this letter is a notification of the Applicant’s intention to submit a change request, in line with the Guidance. This

letter addresses the requirements in the Guidance relating to “Step 1” of the process for requesting a change to an accepted application.

The Applicant also refers to its response to the ExA’s First Written Questions, Q1 HRA 2.4 (document 19.2) and to Lead-in periods for kittiwake on artificial nesting structures (document 19.11).

Table 1 below provides the relevant details as set out in the Guidance.

**Table 1**

<b>Information to include in a change notification</b>	<b>Applicant’s Response</b>
A clear description of the proposed change, including any new works, altered works and ancillary matters	The draft DCO (reference 3.1) will be updated to amend the references in paragraph 4(a)(iii) and 5 of Part 1, Schedule 22 of the dDCO from three full breeding seasons to two full breeding seasons.
A statement setting out the reasons and need for making the change to the application	<p>The reduction the length of time the proposed artificial nesting structure(s) needs to be in place before operation of the project from three full kittiwake breeding seasons to two full kittiwake breeding seasons allows more efficiency in the Project’s construction programme by reducing the overall time period between construction of the ANS and operation of the Project. This would, in turn, speed up the Project’s delivery of renewable energy generation and the Project’s significant contribution to limiting the extent of climate change in accordance with the objectives of the Paris Agreement, UK Government policy, and imperative, long-term, public interest goals.</p> <p>The Applicant considers that there is sufficient evidence to justify the reduction in the proposed time between implementation of the ANS and operation of any turbine to two full kittiwake breeding seasons. That evidence is set out in Lead-in periods for kittiwake on artificial nesting structures (document 19.11).</p>
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 Environmental Statement (ES). As there is no change to either the physical parameters or the locations of the ANS(s), it has been concluded that the change is not expected to

Information to include in a change notification	Applicant's Response
likely significant environmental effects	result in any new or different likely significant environmental effects.
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"> <li>• the proposed change would not generate new or different likely significant environmental effects;</li> <li>• the proposed change would not require additional compulsory acquisition powers; and</li> <li>• the proposed change is being proposed early within the Examination timetable and it is considered that there is sufficient time to fully examine it.</li> </ul>
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 Applicant proposes to consult on the proposed change in parallel to the ExA's preliminary considerations as to the nature of the change.</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 proposes to consult on the proposed change with Natural England, the MMO, the RSPB, the Maritime and Coastguard Agency, Trinity House, Chamber of Shipping, the Defence Infrastructure Organisation, NATS En Route Limited, Historic England and The Crown Estate giving a minimum of 28 days for response.</p> <p>In light of the limited scope of the proposed change, no other consultation is considered by the Applicant to be required.</p>
The expected submission date for the 'change application'.	The Applicant expects to submit the change application at the earliest practicable deadline following completion of consultation.

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

Yours sincerely,

**Chris Jenner**

Development Manager  
Outer Dowsing Offshore Wind