

Outer Dowsing Offshore Wind

The Applicant's Change Notification dated 20 February 2025

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20 February 2025

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**”). In accordance with the Guidance, this letter is a notification of the Applicant’s intention to submit a change request.

The Applicant is grateful to the Examining Authority (“**ExA**”) for their comments at Issue Specific Hearing 5 and Issue Specific Hearing 6 encouraging all parties to redouble their efforts to narrow the issues before the ExA in the coming weeks. In light of the discussions at the hearings held week commencing 10 February 2025, the Applicant has further considered the adjustments that could be made to the proposals for the Outer Dowsing Offshore Wind Farm (the “**Project**”) and proposes the following changes:

- **Change 1:** a commitment to the installation of removeable cable protection on defined areas of supporting habitat for *S. spinulosa* reef within the Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (“**IDRBNR SAC**”) (as shown on Plan 1) as further mitigation for the impacts of the Project on the IDRBNR SAC;
- **Change 2:** narrowing the options that may be pursued as compensation measures for impacts on the sandbank and biogenic reef features of the IDRBNR SAC;
- **Change 3:** removal of the option to install gravity base structure (“**GBS**”) foundations for the Offshore Reactive Compensation Platforms (“**ORCP**”) to reduce the maximum design scenario for marine physical processes effects; and
- **Change 4:** the introduction of a seasonal restriction for construction works within the Greater Wash Special Protection Area to further mitigate impacts on overwintering red-throated diver.

In addition to the above four changes, the Applicant is considering the potential introduction of temporal piling restrictions for the protection of herring during the spawning season, covering defined areas within the Array and the northern ANS area ("**Change 5**").

The Applicant's view is that the proposed changes fall within the category of updates that do not constitute a change to the Order, being instead changes to the draft DCO "as articles are reviewed, drafting is improved, or requirements are developed" (the Guidance, New or Revised Information).

However, the Applicant is mindful that the ExA may take a different view and wishes, as with previous change notifications, to ensure that proposed changes are pre-emptively highlighted to the ExA. On this basis, this Change Notification has included them and set out the information required under the Guidance.

The Applicant is grateful to the ExA for their consideration of this Change Notification outside the formal deadline cycle. If the ExA was minded to agree that the above changes do not constitute changes which require a formal Change Request, the Applicant intends to update the dDCO and relevant supporting documents to incorporate these amendments at Deadline 4a in respect of Changes 1-4 and, in the event that the Applicant proposes Change 5 following its further consideration of any such commitment and discussion with the Marine Management Organisation ("**MMO**"), at Deadline 5 or earlier if possible.

The Appendix to this letter provides, in respect of the proposed change, the information to be included in a change notification as set out in "Step 1" of the Guidance.

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 – The Proposed Changes

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.

Change 1 – commitment to the installation of removeable cable protection on defined areas of supporting habitat for *S. spinulosa* reef within the IDRBNR SAC

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 proposes to update the Outline Specification and Installation Plan (REP4-082) and the Outline Scour Protection and Cable Protection Management Plan (REP4-080) to introduce a commitment to the installation of removeable cable protection on defined areas of supporting habitat for <i>S. spinulosa</i> reef within the IDRBNR shown on Plan 1.
A statement setting out the reasons and need for making the change to the application	<p>The change is being proposed in response to comments received from Natural England at Deadline 3 (Appendix C2 (REP3-067) and Appendix C3 (REP3-068) concerning supporting habitats and processes for Annex I <i>S. spinulosa</i> reef and supplementary advice provided within Natural England's comments at Deadline 4 (Appendix C4 to the Natural England Deadline 4 Submission (REP4-137)).</p> <p>Plan 1 shows the areas of supporting habitat for <i>S. spinulosa</i> reef following a mapping exercise that was carried out by the Applicant to determine the extent of potential supporting habitat in accordance with the methodology advised by Natural England.</p> <p>The Applicant notes that, at Deadline 4 (REP4-137), Natural England commented:</p> <p><i>"Natural England advises the Applicant undertakes and submits into examination an assessment of supporting habitats and processes for potential Annex I S. spinulosa reef, to demonstrate that the recovery of this feature will not be hindered by the installation of the export cable and/or the lasting placement of cable protection. This will provide the Secretary of State comfort an adverse effect on integrity to IDRBNR SAC Annex I reef features and habitats/processes in which it relies upon will be avoided."</i></p> <p>The Applicant continues to engage with Natural England on this matter. It is anticipated that, in the event that agreement can be reached on the interpretations of the methodology and the results of the mapping exercise, the Applicant's commitment to</p>

Information to include in a change notification	Applicant's Response
	removeable cable protection over the areas of supporting habitat shown on Plan 1 will provide the ExA and the Secretary of State with sufficient comfort that an adverse effect on integrity to the Annex I reef features of the IDRBNR SAC will be avoided.
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). It has been concluded that the change is not expected to 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"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; • the proposed change is being proposed in response to comments from statutory consultees with a view to narrowing the outstanding issues before the Examination; and • the proposed change is being proposed at a point in the Examination timetable where there are two further deadlines remaining and a further set of hearings scheduled before the close of the Examination therefore 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 consulted with Natural England on the methodology used and the results of the mapping exercise for S.</p>

Information to include in a change notification	Applicant's Response
	<p><i>spinulosa</i> reef. The Applicant understands that Natural England is considering the results of the mapping exercise..</p> <p>As noted above, Change 1 has been proposed in response to comments from Natural England. In light of the limited scope of this change, and the ability of Interested Parties to comment on the change during the Examination, no other consultation is considered by the Applicant to be required.</p>
The expected submission date for the 'change application'.	The Applicant does not expect to submit a change application. Should the Applicant require to do so it would be content to do so at Deadline 4a, subject to confirmation from the ExA that no additional consultation is required.

Change 2: narrowing the options that may be pursued as compensation measures for impacts on the sandbank and biogenic reef features of the IDRBNR SAC

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 Applicant proposes to update Parts 4 and 5 of Schedule 22 of the draft DCO (REP4-008) to reduce the options that may be pursued as compensation measures for impacts on the sandbank and biogenic reef features of the IDRBNR SAC.</p> <p>The Applicant proposes to remove the following compensation options from Part 4, Schedule 22 of the DCO:</p> <ul style="list-style-type: none"> • the marine debris measure; • the sandbank protection measure; and • the seagrass bed habitat creation/restoration measure. <p>The Applicant proposes to remove the following compensation options from Part 5, Schedule 22 of the DCO:</p> <ul style="list-style-type: none"> • the marine debris measure; and • the biogenic reef protection measure.
A statement setting out the reasons and need for making the change to the application	<p>The change is being proposed in response to comments by Natural England in their response to Q1 HRA 2.14 (REP2-074) and reflected in the Natural England's Risk and Issues Log at Deadline 4 (REP4-144). Natural England commented that:</p> <p><i>"Natural England highlights that the progression of strategic compensation has come about due to the extreme difficulties in delivering project specific benthic compensation. In this context and at this stage, we do not believe that there is merit in progressing and/or placing reliance upon project specific benthic compensation measures."</i></p> <p>As a result, the Applicant proposes to narrow the options for benthic compensation that the Applicant is able to pursue under Parts 4 and 5 of Schedule 22 of the DCO.</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	The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES). It has been

Information to include in a change notification	Applicant's Response
to result in any new or different likely significant environmental effects	concluded that the change is not expected to 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"> • the proposed change would not generate new or different likely significant environmental effects; • the proposed change would not require additional compulsory acquisition powers; • the proposed change is being proposed in response to comments from statutory consultees with a view to narrowing the outstanding issues before the Examination; and • the proposed change was trailed during the discussions at Issue Specific Hearing 6, is being proposed at a point in the Examination timetable where there are two further deadlines remaining and a further set of hearings scheduled before the close of the Examination therefore 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>As noted above, Change 2 has been proposed in response to comments from Natural England. In light of the limited scope of this change, and the ability of Interested Parties to comment on the change during the Examination, no other consultation is considered by the Applicant to be required.</p>
The expected submission date for the 'change application'.	The Applicant does not expect to submit a change application. Should the Applicant require to do so it would be content to do so at Deadline 4a, subject to confirmation from the ExA that no additional consultation is required.

Change 3: removal of the option to install GBS foundations for the ORCPs

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 Applicant proposes to update Work No. 7 in Part 1, Schedule 1, Requirement 3, Part 3, Schedule 1, Work No. 7 in Part 1, Schedule 11 and Condition 2, Part 2, Schedule 11 of the DCO to remove the option to install GBS foundations for the ORCPs.</p> <p>Requirement 4(1), which specifies that 50% of foundations across the various structures is to be retained, i.e. the Applicant confirms that the ORCP foundations will not form part of the 50% GBS foundations which may be installed across the Order Limits.</p>
A statement setting out the reasons and need for making the change to the application	<p>The change is being proposed to make progress on the matter identified as "Red" in the Natural England Risk and Issues Log in relation to Marine and Coastal Processes (item 12, Tab B, REP4-144). The Applicant understands that the primary concern from Natural England with regard to the ORCP location is potential effects on the Inner Dowsing sandbank within the IDRBNR SAC. The Applicant does not consider there to be any pathway for effect to the sandbank from the ORCP (due to the ORCP being located to the west of the Inner Dowsing sandbank and the primary currents running north-south within this region of the ECC). However, removal of GBS foundations, which are considered to have the greatest likelihood for alterations to the hydrodynamic regime, provides further confidence to Natural England that there is no potential for an AEoI to the SAC from the location of the ORCP.</p>
A statement establishing whether the proposed change involves changes to the Order land	<p>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.</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>The environmental implications of this change have been reviewed to fully understand whether the changes affect the conclusions of the Environmental Statement (ES). It has been concluded that the change is not expected to result in any new or different likely significant environmental effects.</p>
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;

Information to include in a change notification	Applicant's Response
	<ul style="list-style-type: none"> • the proposed change would not require additional compulsory acquisition powers; • the proposed change is being proposed in response to comments from statutory consultees with a view to narrowing the outstanding issues before the Examination; and • the proposed change is being proposed at a point in the Examination timetable where there are two further deadlines remaining and a further set of hearings scheduled before the close of the Examination therefore 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>As noted above, Change 3 has been proposed in response to comments from Natural England. In light of the limited scope of this change, and the ability of Interested Parties to comment on the change during the Examination, no other consultation is considered by the Applicant to be required.</p>
<p>The expected submission date for the 'change application'.</p>	<p>The Applicant does not expect to submit a change application. Should the Applicant require to do so it would be content to do so at Deadline 4a, subject to confirmation from the ExA that no additional consultation is required.</p>

Change 4: the introduction of a seasonal restriction for construction works within the Greater Wash Special Protection Area to further mitigate impacts on overwintering red-throated diver

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 proposes to introduce, by way of a deemed marine licence condition, a seasonal restriction for construction works associated with the offshore export cable and ORCP installation works within the Greater Wash Special Protection Area during the overwintering period for red-throated diver between 1 November and 31 March inclusive, unless otherwise agreed with the MMO following consultation with Natural England.
A statement setting out the reasons and need for making the change to the application	<p>The change is being proposed to make progress on one of the matters identified as "Red" in the Natural England Risk and Issues Log in relation to Offshore and Intertidal Ornithology (item 21, Tab F, REP4-144).</p> <p>The Applicant considers that the mitigation proposed, i.e. use of a best practice vessel management protocol as detailed within the Outline Vessel Management Plan (PD1- 064), is sufficient to support a conclusion of no AEol to the Greater Wash SPA and therefore additional mitigation during construction is not required in this case. However, in acknowledgement of the outstanding disagreement with Natural England on this matter (row 18 of the Natural England Risk and Issues Log [REP4-144]), in order to provide further confidence to Natural England that the potential for an AEol can be excluded for impacts to red-throated diver, the Applicant is proposing to commit to a full seasonal restriction for construction activities during the period 1st November to 31st March (inclusive). The Applicant anticipates that this will enable full resolution of this issue.</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 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). It has been concluded that the change is not expected to result in any new or different likely significant environmental effects.
Information to establish how the applicant considers the	The change can be accommodated within the remaining statutory timescales because:

Information to include in a change notification	Applicant's Response
change to the application can be accommodated within the remaining statutory timescales	<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; • the proposed change is being proposed in response to comments from statutory consultees with a view to narrowing the outstanding issues before the Examination; and • the proposed change is being proposed at a point in the Examination timetable where there are two further deadlines remaining and a further set of hearings scheduled before the close of the Examination therefore 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>As noted above, Change 4 has been proposed in response to comments from Natural England. In light of the limited scope of this change, and the ability of Interested Parties to comment on the change during the Examination, no other consultation is considered by the Applicant to be required.</p>
The expected submission date for the 'change application'.	The Applicant does not expect to submit a change application. Should the Applicant require to do so it would be content to do so at Deadline 4a, subject to confirmation from the ExA that no additional consultation is required.

Change 5: the potential introduction of temporal piling restrictions for the protection of herring during the spawning season, covering defined areas within the Array and the northern ANS area

Information to include in a change notification	Applicant's Response
<p>A clear description of the proposed change, including any new works, altered works and ancillary matters</p>	<p>The Applicant is considering the potential introduction of temporal piling restrictions for the protection of herring during the spawning season, covering defined areas within the Array and the northern ANS area.</p> <p>On page 49 of the MMO's Deadline 4 Submission (REP4-129), the MMO explained that: <i>"Our most recent meeting with the Applicant was held on 16 January 2025 when preliminary discussions were held on the matter of spatially refining the temporal piling restriction during the Banks herring spawning season. The MMO is awaiting further evidence on this matter from the Applicant in the form of a consultation. The discussions remain ongoing."</i></p> <p>The Applicant is continuing to engage with the MMO in relation to the need for and extent of any piling restriction for the benefit of herring.</p>
<p>A statement setting out the reasons and need for making the change to the application</p>	<p>The change is being proposed to make progress on the issue that the MMO describes at p51 of their Deadline 4 Submission (REP4-129) as the "Main Outstanding Issue" between the MMO and the Applicant.</p>
<p>A statement establishing whether the proposed change involves changes to the Order land</p>	<p>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.</p>
<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). It has been concluded that the change is not expected to result in any new or different likely significant environmental effects.</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;

Information to include in a change notification	Applicant's Response
	<ul style="list-style-type: none"> the proposed change is being proposed in response to comments from statutory consultees with a view to narrowing the outstanding issues before the Examination; and the proposed change is being proposed at a point in the Examination timetable where there are two further deadlines remaining and a further set of hearings scheduled before the close of the Examination therefore 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>As noted above, Change 5 has been proposed in response to comments from the MMO. In light of the limited scope of this change, and the ability of Interested Parties to comment on the change during the Examination, no other consultation is considered by the Applicant to be required.</p>
<p>The expected submission date for the 'change application'.</p>	<p>The Applicant does not expect to submit a change application. The above change is notified to request the ExA's view on whether, in principle, such an additional restriction would constitute a change requiring a formal Change Request. Should the Applicant require to do so it would be content to do so at Deadline 5 or earlier if possible, subject to confirmation from the ExA that no additional consultation is required.</p>

Plan 1 – *S. spinulosa* reef supporting habitat

