

Our Ref: 01.01.01.01-4178U
UKOP Doc Ref:1163937



Offshore Petroleum Regulator
for Environment & Decommissioning

IOG NORTH SEA LIMITED
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Registered No.: 07632999

Date: 7th October 2021

Department for Business, Energy
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

BLYTHE TO ELGOOD PIPELINE PL4955 & UMBILICAL PLU5039

I refer to your amended application dated 30th September 2021, reference PL/2106/2 (Version 2).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact [REDACTED] on [REDACTED] or email the Environmental Management Team at bst@beis.gov.uk.

Yours faithfully



**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

**SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT
ASSESSMENT IS NOT REQUIRED**

BLYTHE TO ELGOOD PIPELINE PL4955 & UMBILICAL PLU5039

PL/2106/2 (Version 2)

Whereas IOG NORTH SEA LIMITED has made an application dated 30th September 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 7th October 2021



THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

SCHEDULE OF SCREENING DIRECTION CONDITIONS

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

1 Screening direction validity

The screening direction shall be valid from 19 September 2020 until 30 June 2022.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: bst@beis.gov.uk

3 Nature of stabilisation or protection materials

Biodegradable grout/ sand bags

One hundred and eight [108] tonnes of clean, inert rock, grout or sand material containing minimal fines, contained within 1 tonne (40 x 25 kilogramme capacity biodegradable bags). Thirty two [32] to be laid on PL4955 to complete work started in 2020 and Seventy six [76] to be laid on PLU5039 (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

PL/2106/2 : 2 x tonnes of clean, inert rock, grout or sand material containing minimal fines, contained within 80 x 25 kilogramme capacity biodegradable bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete mattress deposits

Two hundred and forty six [246] concrete mattresses, each measuring 6 metres x 3 metres x 0.15 metres. Sixty [60] mattresses to complete work on PL4955 started in 2020 and One Hundred and Eighty Six mattresses to protect umbilical PLU5039 (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

PL/2106/2 : 29 x concrete mattresses each measuring 6 metres x 3 metres x 0.3 metres to mitigate against upheaval buckling on PL4955. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).



Duraguard Umbilical Protection Structure

One [1] to be placed on PLU5039

Other deposits including temporary deposits as stated in the application and associated with PWA Deposit Consents issued by the OGA.

4 Location of pipeline and stabilisation or protection materials

As stated in the application and associated PWA Consent(s) issued by the OGA.

5 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

6 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

7 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

8 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.



9 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

10 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

11 Screening direction variation

In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

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COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

PL/2106/2 (Version 2) 7th October 2021 - The Department has no comments.

PL/2106/1 (Version 3)

1) Deposits must either have a temporary use for pipeline and umbilical installation or be permanently deposited to remove wet storage which is not recommended in a mobile sandbank area.

2) Only the pipeline lengths which have been applied for may be laid regardless of footprint impact.

3) All communications relating to the screening direction should be addressed to:

Out-of-hours emergency screening direction variations:

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

Routine communications

bst@beis.gov.uk

or

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Department for Business, Energy & Industrial Strategy
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SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, summarises the information considered, the potential impacts and sets out the main reasons for the decision made. In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

1. The information provided by the developer.
2. The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).
3. The results of any preliminary verifications or assessments of the effects on the environment of the project; and
4. Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the Project

This post screening direction amendment (ref PL/2106/2) relates to a change to the project for which a screening direction was previously issued.

Having regard, in particular, to the matters identified in Schedule 5 1(a) to (g) of the Regulations, the characteristics of the project include the following:

Summary of project

The installation of the 9.1km of 6" gas export pipeline PL4955 between the Elgood subsea well and the 6" riser on the Blythe platform were subject to the Offshore Petroleum Production and Pipe-lines (Assessment of Environmental Effects) Regulations 1999 PLA/769 PL/1965, DEP/1964, and OGA consents PA/3536, PA/3412 & PA/3202.

This project (PL/2106/2) includes 29 additional concrete mattresses and 80 temporary grout bags, laid at intervals along the length of the Blythe export pipeline PL4956, to mitigate against upheaval buckling, and to extend the end date of the operations from 31 October 2021 to June 2022. It will be consented by the Oil and Gas Authority (OGA) under Pipeline Works Authorisation (PWA) 5/W/20 reference



PA3623. The previous screening direction and variation relating to PLA/769 are as follows:

PL/2106/0 - The presence and connection of the Elgood umbilical (PLU5039) and associated protective deposits (the associated PWA/5/W/20 consent was issued by the Oil and Gas Authority), and the presence and connection of one 6" riser from the Blythe platform to the Elgood pipeline PL4955.

PL/2106/1 - To complete the gas pipeline tie in and protecting this with deposits at the Elgood well and Blythe platform ends with further update to install a service umbilical PLU5039 between the well and platform again with protective deposits (OGA consent PA/3333 & PA/3505) with temporary equipment on the seabed to undertake the installation. Also to include the temporary deposits on the seabed including tools and equipment to complete the tie in of PL/4955 gas pipeline; to include the temporary location of 75m of PLU5039 at Elgood well end to be looped away from its permanent location on a temporary basis should the drill rig (Hans Duel) still be on location (the drill rig was scheduled to depart on the 31st August 2021).

Description of project

The change to the project includes 29 additional concrete mattresses and 80 temporary grout bags, laid at intervals along the length of the Blythe export pipeline PL4956, to mitigate against upheaval buckling, and to extend the end date of the operations from 31 October 2021 to June 2022. It will be consented by the Oil and Gas Authority (OGA) under Pipeline Works Authorisation (PWA) 5/W/20 reference PA3623. The previous screening direction and variation descriptions are as follows:

The Blythe platform was constructed onshore with one 6" and two 12" rigid gas risers pre-installed inside the internal structure of the centre tower of the platform and installed under Direction PRA/300 PR/2093, and OGA consent PA/3412). The platform will produce from the subsea well associated with the Elgood field via a 6" gas pipeline PL4955 on the Elgood side of the Blythe platform and via a 12" gas export pipeline PL4956 on the onshore side to be linked into the former Thames pipeline PL370 via a connection. The 12" gas export pipeline and connector installation between Blythe platform and the Thames pipeline was subject to a separate Direction PLA/768 PL/1952 and DEP/1953, PL/2114 and OGA consent PA/3413, PA/3526). The Thames PL370 gas export pipeline will be re-commissioned to enable the export of Elgood gas via Blythe platform on to the Bacton onshore terminal on the Norfolk coast. (That application is being considered under Direction PL/2126, and OGA consents PA/3512, PA3473 and PA3476.)

In 2020 Direction PLA/769 PL/1965 and DEP/1964 covered the installation of the 9.1km 6" gas pipeline PL4955 between the Blythe platform and the Elgood subsea well which was trenched and buried to a depth of 1m, 48 mattresses laid and temporary equipment located on the seabed to enable the installation including an initiation anchor, line and pig launch receivers to commission the line.



In 2021 the completion of the tie in of the 6" gas pipeline PL4955 was requested under Direction PL/2106 with the installation of spool pieces at the Elgood well and Blythe platform (OGA consent PA/3412), linking PL4955 to the well and the 6" gas riser at the platform with associated protection deposits, including 60 mattresses previously requested to be laid in 2020 and grout/ sand bags (OGA consent PA/3536). Temporary deposits were requested for this work including but not limited to tools to handle deposits/ spools, pig launcher, workbaskets for divers, transponders to assist in locating assets, a dredger to expose anything that has subsequently buried and equipment to test the pipeline seals. This was covered by OGA consents PA/3202 and PA/3536.

Further work was requested in 2021 to install the 9.3km service umbilical PLU5039 between the Elgood well and platform by trench and burial to a depth of 1m with protection deposits proposed for the well and platform ends using 186 concrete mattresses, 76 tonnes of grout/ sandbags and Duraguard umbilical protection. That installation required temporary deposits including items such as transponders to accurately locate items, clump weights, handling rigging, temporary location of the mattresses and grout/ sandbags, a dredger and pull in wire. All temporary items to be removed upon installation as per OGA consents PA/3505 and PA/3333 and Direction PL/2106.

The operations are expected to be completed by 30th June 2022. However, this application, a further variation to PL/2106 acknowledges that a drill rig remains on location at Elgood well until 31st August 2021, therefore, a request has been made to temporarily locate 75m of the service umbilical PLU5039 at the well end and loop it away from the well using grout bags as turning bollards until it can be permanently located after rig departure. This application also included those temporary deposits outlined previously to complete installation of PL/4955 gas pipeline as per OGA consent PA/3536.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The developer has control measures in place to reduce the risk of an unplanned release occurring and the probability of such an event occurring is very low.

No cumulative impacts are expected to occur with any other existing or approved Projects as a result of the change to operations.

It is not considered to be likely that the project will be affected by natural disasters or unplanned major accident scenarios and there is no risk to human health. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health as a result of the change to the project.

Location of the project

Having regard, in particular, to the matters identified in Schedule 5 2(a) to (c) of the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows.



The pipeline project area is located in Block 48/22 and 48/23 in the southern North Sea (SNS) in an approximate water depth ranging from 22 to 28 metres (m), approximately 36km north east of the UK (United Kingdom) and 107km west of the UK/Netherlands median line. The project area is not located within any protected areas. The following protected areas are within 40km of the site of the operations:

North Norfolk Sandbanks and Saturn Reef (NNSSR) SAC, located 15km northeast,

Southern North Sea SAC, 19km east,

Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (SAC), 24km northwest,

Greater Wash Special Protected Area (SPA) 26km southwest,

The Wash and North Norfolk Coast, located 31km away,

Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ), 26km west,

Haisborough, Hammond and Winterton SAC, 27km southeast.

The project is in an area characterised by deep circalittoral sand (sand, gravelly sand gravel) in a sandbank system of mobile bed forms, including sand waves and mega-ripples. The quantitative assessment of seabed imagery obtained during the pipeline route survey indicated that the species abundance and diversity were typical of the SNS. Benthic communities within sandy mobile sediments are typically low in both numbers of taxa and individuals and dominated by species adapted to a degree of physical disturbance associated with tidal movement and wave action. Broken *Sabellaria spinulosa* tubes were collected in a few grab samples within the survey area but no intact *Sabellaria spinulosa* tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of *Sabellaria spinulosa* that could be classified as 'reef' (i.e., not an Annex I habitat) within the surveyed area. Species diversity appeared to increase in areas of coarser sediments (favouring epilithic attachment). Epifauna was generally sparse throughout the survey area. No sensitive epifaunal species were identified near the platform location.

The fishing effort in the area (ICES (International Council for the Exploration of the Sea) 35F1) is rated low for demersal and pelagic fisheries landings and value of catch and medium for shellfish. Fish spawning and nursery activity will occur in the area, which may coincide with the operations. However, the area is considered unsuitable for herring spawning, installation is unlikely to occur during sandeel spawning due to weather and spawning intensity for sandeels in the area and impacts are limited to a pipeline corridor.

Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided dolphin have been recorded in the vicinity. Densities of these species range from high to low



throughout the year. Common seal and the grey seal are resident in the SNS, and the Wash and North Norfolk Coast SAC, provides ideal breeding site and haul out conditions, located 30.6km southwest of the operation area. Common seals usually feed within 50km of their haul-out site and therefore may be observed within the operational area. Grey seals usually feed within 100km of their haul-out site and therefore, may be observed within the operational area, however it is estimated that they only spend 12% of their time at distances greater than 50 km from the coast.

Seabird vulnerability is very high from October to February (extremely high in four surrounding Blocks), high in March, April and August, moderate in September, and low from May to July. Shipping density in the area is high to very high.

A significant portion of vessel activity appear to be attributed to the Dudgeon Offshore windfarm which routes vessel traffic around its south western edge. Fishing activity is identified in the areas surrounding the operational area but the major traffic is associated with general shipping and passing vessels. The project location is within the East Offshore Marine Plan area, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites have been identified within 40km of the operation.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) of Schedule 5 to the Regulations will be affected by the project.

Type and characteristics of the potential impact

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges and accidental spills. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

The physical presence of the vessels involved with the operations will not have an exclusion area attributed to them, however will be subject to navigational provision and would be able to move away from location in an emergency. The presence of the additional protection materials will be wholly within the pipeline corridor, and so the impact on other users of the sea is not expected to be significant.

Block 48/22c has very high shipping density and 48/23b and 48/23a a high shipping density. The Dudgeon offshore wind farm has diverted larger vessel traffic south and west away from Elgood and there is a 500m safety exclusion zone around the Blythe platform excluding unauthorised access to vessels. The Vessel Traffic Survey indicates two main shipping lanes lay out with the proposed operation area and the temporary location of vessels in shallow open sea provides adequate room for vessels to pass at a safe distance. There are no navigational concerns, and no objections were received from the navigational consultees for any of the work



proposed.

Power generation by the vessels result in the emission of gases to the atmosphere, however, it is expected that the emissions will be rapidly dispersed and are not likely to have a significant impact.

The cetacean density for Atlantic white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise (Annex II species) ranges from low to high, the latter relating to harbour porpoise densities in July and otherwise low to medium densities throughout the year. The proposed operations are unlikely to have a significant impact on these species. Due to the distance of the operational area from shore, harbour seals and grey seals (Annex II species), are not likely to be encountered regularly at the operational area. Any noise generated during operations is expected to be within local background levels.

Broken Sabellaria spinulosa tubes were collected in a few grab samples within the survey area but no intact Sabellaria spinulosa tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of S. spinulosa that could be classified as 'reef' within the surveyed area. No evidence of any potential Annex I Habitats have been found in the vicinity. The nearest Annex I habitat 'Sandbanks which are slightly covered by seawater all of the time' is 15.6km from the location of the operational area (North Norfolk Sandbanks and Saturn Reef SAC). The connection of the 6" gas pipeline and service umbilical between Elgood well and Blythe platform and associated protective deposits is not expected to impact any additional areas of the seabed, other than those already assessed and covered by PLA/769 PL/1965 and DEP/1964 and PL/2106. There is no likely significant effect associated with the connection of PL4955 and PLU5039 to the Blythe platform and Elgood well.

The change to the project will result in the placement of deposits within the pipeline corridor and the worst case seabed footprint impacted by the placement of the additional deposits will be 0.000531 km² (0.00522 km² from the mattresses and 0.000009 km² from the temporary grout bags). The mattresses will be removed at the time of decommissioning and the grout bags will be recovered post operation. The placement of the deposits on the seabed will result in direct physical impact to benthic habitats and species within the immediate footprint of the operation. The seabed is inhabited by numerous organisms, including sessile species and animals that are unable to move rapidly or over large distances. The area of seabed directly affected is very small and represents a minute fraction of the similar habitat available in this region of the North Sea and therefore the impacts are not considered to be significant.

The worst-case footprint associated with the trenching and burying of PL/4599 is 18,200m² installed in 2020 with a further 18,600m² footprint to trench and bury the service umbilical PLU/5039 in 2021. Permanent deposits for PL/4955 laid in 2020 impacted 864m² and will impact 4,550m² in 2021 associated with PL/4955 and PLU5039. Temporary impacts on the seabed from tools and equipment were 64m² in 2020 and will total 5,589m² in 2021 which includes the temporary relocation of 75m



of service umbilical should the drill rig be on site during umbilical lay.

The trenching and burial plus the temporary location of tools and equipment and permanent deposits on the seabed will create sediment suspension which will be confined to the immediate vicinity of the project location. Recovery is highly likely in this area of mobile sand bedforms. Impacts on benthic fauna from trenching and burial and temporary placement will occur with recovery potential high because species are adapted to a mobile environment. Permanent deposits will result in a very minor area of loss of habitat and species, most of the pipeline and umbilical are/ will be buried. All of these impacts when considered are not likely to be significant, confined to a highly localised corridor area for both PL/4955 and PLU5039.

The chemicals associated with installing the Elgood production pipeline PL/4955 and the change to the project were assessed as posing no risk to the marine environment.

There are no expected transboundary effects from the change in operations due to the localised and temporary nature of the disturbance and the 107km distance from the UK/Netherlands Median Line. It is not considered likely that any planned operational discharge will be detectable at this distance from the project location.

Although not a planned activity, an unplanned release of diesel from a vessel was assessed. The developer has mitigation and control measures in place to prevent this. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low.

The Dudgeon offshore wind farm is operational and is approximately 0.2km west of the operational area and the project is not considered to have any significant in-combination impacts. There are no planned construction operations, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites within the vicinity of the proposed operations. The operations are in accordance with the East Offshore Marine Plan's objectives and policies.

It is considered that the completion of work to connect the 6" gas pipeline PL4955 to the Blythe platform and install the service umbilical PLU5039 and temporarily locate 75m of it while the drill rig is at Elgood is not likely to have a significant impact. There will be no impact cumulatively with other activities or other users of the sea and no cumulative impacts are expected to occur.

It is considered that the change to the project is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the change to the project is not likely to have a significant impact on the



environment and that an environmental impact assessment is not required.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

N/A