

**Infrastructure Planning  
Planning Act 2008  
The Infrastructure Planning (Examination Procedure) Rules 2010**

**Outer Dowsing Offshore Wind Project – DCO Application**

**Issue Specific Hearing 6 on Offshore Environmental Matters**

**Post Hearing Submissions (including written submissions of oral case)**

**of**

**the Ørsted IPs**

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1. **INTRODUCTION**

- 1.1 This document summarises the main oral submissions made by Hornsea 1 Limited, the collective of Breesea Limited, Soundmark Wind Limited, Sonningmay Limited and Optimus Wind Limited (together, the “**Hornsea 2 Companies**”), Orsted Hornsea Project Three (UK) Limited, Orsted Hornsea Project Four Limited, Lincs Wind Farm Limited, Westermost Rough Limited and Race Bank Wind Farm Limited (together or in any combination, the “**Ørsted IPs**”) at Issue Specific Hearing 6 (**ISH6**) dealing with Offshore Environmental Matters held on 13 February 2025, in relation to the application for development consent for the Outer Dowsing Offshore Wind Project (the “**Outer Dowsing Project**”) by GT R4 Limited, trading as Outer Dowsing Offshore Wind (the “**Applicant**”).
- 1.2 ISH6 was attended by the Examining Authority (the “**ExA**”), the Applicant and a number of Interested Parties, including the Ørsted IPs.
- 1.3 This document does not purport to summarise the oral submissions of parties other than the Ørsted IPs, and summaries of submissions made by other parties are only included where necessary in order to give context to the Ørsted IPs’ submissions in response.
- 1.4 Numbered items referred to are references to the numbered items in the agenda published by the ExA on 5 February 2025 [**EV11-001**] (the “**Agenda**”). The Ørsted IPs made oral submissions under Agenda items 3.1, 3.5 and 3.6 only. Where post hearing notes have been added, those notes are prefixed with “Post Hearing Note” and set out in italics for clarity.

## 2. WRITTEN SUMMARY OF THE ØRSTED IPS' ORAL SUBMISSIONS

Agenda Item	Ørsted IPs' Oral Submissions and Post Hearing Notes
<b>Item 3.1</b>	
<b>Welcome and Introductions</b>	<b>Alex Tresadern, for the Ørsted IPs</b> , did not make any substantive submissions in relation to this agenda item, other than to introduce the Ørsted IPs.
<b>Item 3.5</b>	
<b>Shipping and Navigation</b> <ul style="list-style-type: none"> <li>• Navigational Risk Assessment.</li> </ul>	<p><b>The ExA</b> asked the Ørsted IPs to expand on the statement in their Deadline 4 submission [REP4-149] that “<i>the Applicant’s NRA does not contain a sufficiently broad risk assessment</i>”. <b>Alex Tresadern, for the Ørsted IPs</b>, referred to the submission made by the Ørsted IPs at Deadline 4 and confirmed that any further reasoning for this statement would be provided in writing at Deadline 4a.</p> <p><b>The ExA</b> also asked the Ørsted IPs to confirm whether they would be undertaking an external review of the Applicant’s Navigational Risk Assessment. <b>Alex Tresadern, for the Ørsted IPs</b>, confirmed that this has not yet taken place and it was agreed that the Ørsted IPs would confirm in writing at Deadline 4a whether this would be undertaken.</p> <p><u>Post Hearing Note</u></p> <p><i>The Ørsted IPs note that the above actions were confirmed by the ExA as Action Point 14 from ISH6 [EV11-002] and has addressed this in their separate Deadline 4a submission.</i></p>
<b>Item 3.6</b>	
<b>Oil, Gas and Other Offshore Infrastructure</b> <ul style="list-style-type: none"> <li>• Wake Loss Technical Note.</li> <li>• Updates on co-operation and agreements.</li> </ul>	<p><b><u>Wake Loss Technical Note</u></b></p> <p><b>The ExA</b> asked the Applicant to explain how the wake loss assessment methodology used in the Applicant’s Wake Loss Technical Note [REP4-114] differs from that considered for the Mona Offshore Wind Farm. The Applicant was unable to provide this, as the relevant technical expert was not present at ISH6, so this was confirmed by the ExA as Action Point 15 from ISH6 [EV11-002]. <b>Alex Tresadern, for the Ørsted IPs</b>, noted that the Ørsted IPs are grateful to the Applicant for undertaking this wake loss assessment following the Ørsted IPs’ request for it to do so. <b>Alex Tresadern, for the Ørsted IPs</b>, stated that the Applicant’s assessment is very low on details on the methodology or assumptions used for the calculations contained within, and that initial results indicate material differences between the results from the Ørsted IPs’ own analysis and those reported in the Applicant’s assessment, so an explanation from the Applicant how on the wake loss assessment methodology used in its assessment differs from that considered for the Mona Offshore Wind Farm would be welcomed.</p> <p>It was agreed that the Applicant and the Ørsted IPs would meet before Deadline 4a to discuss the assessments. <b>The ExA</b> asked the Ørsted IPs to provide comments on the Applicant’s assessment by Deadline 4a.</p> <p><u>Post Hearing Note</u></p> <p><i>The Ørsted IPs note that the above action was confirmed by the ExA as Action Point 16 from ISH6 [EV11-002] and has addressed this in their separate Deadline 4a submission.</i></p>

#### Updates on co-operation and agreements

In relation to the Ørsted IPs' request in their Deadline 4 submission [REP4-149] for the Applicant to engage in negotiations with the Ørsted IPs on a cooperation agreement relating to the Hornsea Four Offshore Wind Farm, **the Applicant** provided its reasoning for why it considers this agreement not to be necessary. **Alex Tresadern, for the Ørsted IPs**, responded that the Ørsted IPs would consider this reasoning and provide a response in writing at Deadline 4a.

In relation to protective provisions for the benefit of the Ørsted IPs, **the Applicant** provided its reasoning for why it considers these protective provisions not to be necessary. **Alex Tresadern, for the Ørsted IPs**, responded that the disagreement between the Applicant and the Ørsted IPs in relation to wake loss is relevant here, as this informs the parties' differing positions on the need for protective provisions for the benefit of the Ørsted IPs. It was agreed that the Applicant and the Ørsted IPs would meet before Deadline 4a to discuss the need for protective provisions, with an update on this matter to be provided at Deadline 4a.

In relation to the Ørsted IPs' request in their Deadline 4 submission [REP4-149] for the Applicant to extend the scope of the assessments its Helicopter Access Report [APP-175] and Oil and Gas Platform Allision and Marine Access Study [APP-172], **the Applicant** provided its reasoning for why it considers the extension of the scope for these assessments not to be necessary. **Alex Tresadern, for the Ørsted IPs**, responded that the Ørsted IPs would consider this reasoning, in conjunction with discussions with the Applicant on this matter, and provide a response in writing at Deadline 4a.

In relation in the Ørsted IPs' ongoing request for both the Outline Cable Specification and Installation Plan [REP2-033] and the Outline Vessel Management Plan [PD1-064] to be updated by the Applicant to make specific reference to confirm that Lincs Wind Farm Limited and Race Bank Wind Farm Limited will be consulted by the Applicant as part of the preparation of these documents, **the Applicant** provided its reasoning for why it considers this consultation not to be necessary. **Alex Tresadern, for the Ørsted IPs**, responded that the Ørsted IPs would consider this reasoning and provide a response in writing at Deadline 4a.

#### Post Hearing Note

*The Ørsted IPs have addressed all of the above matters in their separate Deadline 4a submission, including those which were confirmed by the ExA as Action Points 17 and 18 from ISH6 [EV11-002].*