

# Outer Dowsing Offshore Wind

## The Applicant's Deadline 4a Covering Letter

### Deadline 4a

Date: February 2025

Document Reference: 22.1

Rev: 1.0

Company:		Outer Dowsing Offshore Wind		Asset:		Whole Asset	
Project:		Whole Wind Farm		Sub Project/Package:		Whole Asset	
Document Title or Description:		22.1 The Applicant's Deadline 4a Covering Letter					
Internal Document Number:		PP1-ODOW-DEV-CS-LET-0037		3 <sup>rd</sup> Party Doc No (If applicable):		N/A	
Rev No.	Date	Status / Reason for Issue	Author	Checked by	Reviewed by	Approved by	
1.0	February 2025	Deadline 4a	Shepherd & Wedderburn	Outer Dowsing	Outer Dowsing	Outer Dowsing	



FAO Louise Harraway  
Case Manager  
National Infrastructure Planning  
Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

**outerdowsing.com**  
2nd Floor, Boundary House  
91-93 Charterhouse Street  
London  
EC1M 6HR

26 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**  
**Application Reference: EN010130**

The Applicant has submitted a range of documents at Deadline 4a as listed and described in Table 1 below.

In addition to those documents provided in response to Examining Authority (“ExA”) requests in the Rule 8(3) Letter (PD-022) and as a result of Issue Specific Hearing (“ISH”) 5 and 6 Action Points, the Applicant has provided additional documents for the reasons set out in Table 1 and highlighted in this letter. On the basis of discussion with the ExA at ISH 5 and 6 about the status of engagement with certain Interested Parties (“IPs”), an update on this information is set out in Table 2.

The Applicant highlights the following points regarding Deadline 4a submissions to the ExA.

(i) **ES Chapter Updates**

In ISH 2, and as further discussed at ISH5-6, the Applicant noted its intention to provide updates to Environmental Statement (“ES”) Chapters at Deadline 5 in order to, where relevant, reflect: clarifications made to date during the Examination; corrections to errata; additional commitments made through Examination; and changes to status of or addition of cumulative projects. The Applicant has brought forward as many of these ES chapter updates as possible to this deadline from Deadline 5 in response to the ExA’s request for the Applicant to do so. Documents listed in Table 1 have been submitted at D4a, those not listed below and which require to be updated will be provided at Deadline 5 as necessary.

In particular, the Applicant notes that the update to Chapter 12 Offshore and Intertidal Ornithology (6.1.12) provided at this Deadline includes the submission of three additional appendices. These are documents which are already before the Examination (Levels of precaution in the assessment and compensation calculations for offshore ornithology (REP2-

057); Consideration of bioseasons in the assessment of guillemot (REP2-058); and Rates of displacement in guillemot and razorbill (REP2-059). These documents are referred to in the updated Chapter 12 (6.1.12) and so have been included as an Appendix to that Chapter (with minor amendments to the previously submitted versions to update definitions). An additional Appendix has also been submitted in relation to Chapter 25, Land Use (6.1.25) provided at this Deadline. Again this document is already before the Examination (Previously titled BMV Quantitative Cumulative Assessment) (REP4-117)). This document is referred to in the updated Chapter 25 (6.1.25) and so has been included as an Appendix to that Chapter (with some amendments to reflect updates to the Chapter).

(ii) **Updates to on-going discussion with Interested Parties**

As above, an update on the engagement with certain IPs (Natural England; the Marine Management Organisation (“**MMO**”) and TH Clements) is presented in Table 2 in short form for the assistance of the ExA following discussion of outstanding areas of disagreement at ISH5 and 6 and the request by the ExA for all parties to redouble efforts on outstanding disagreement.

(iii) **Change Notifications:**

*The Applicant’s Change Notification dated 20 February 2025*

Further to the discussion of outstanding areas of difference between the Applicant and IPs and in order to seek to narrow such issues, the Applicant proposed the introduction of a number of Project commitments and refinements at set out in 21.22 The Applicant’s Change Notification dated 20 February 2025. The Applicant welcomes the confirmation in the ExA’s Procedural Decision dated 25 February 2025 (PD-024) that the proposed updates do not require a formal change request to be submitted. Following that procedural decision, the Applicant confirms that the following documents have been updated and submitted to reflect the Changes:

- Outline Cable Specification and Installation Plan (8.5)
- Outline Scour Protection and Cable Protection Management Plan (8.21)
- Draft Development Consent Order (3.1)
- Explanatory Memorandum (3.2); and
- Schedule of Changes to the DCO (3.1.1).

The Applicant notes that updates to the following documents will also be required to reflect Change 2 described in the Applicant’s Change Notification dated 20 February 2025 (narrowing of benthic compensation options) and these will be submitted at Deadline 5:

- Without Prejudice Sandbank Compensation Plan (REP4-047);
- Without Prejudice Biogenic Reef Compensation Plan (REP4-049); and
- Without Prejudice Benthic Compensation Evidence Base and Roadmap (REP4-051).

In relation to 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**”)), the Applicant provided a technical note to Natural England on the 18<sup>th</sup> February 2025 in support of the definition of its proposed commitment to removal cable protection in areas of supporting habitat for *Sabellaria spinulosa* reef. Natural England provided initial feedback on this on the 24<sup>th</sup>

February 2025. The Applicant is currently considering this feedback and will respond in due course.

*21.18 The Applicant's Change Notification (REP4-123; submitted at Deadline 4)*

The Applicant welcomes the ExA's confirmation (PD-022) that *"these proposed changes fall within the broad description of changes to the draft DCO as articles are reviewed, drafting is improved, or requirements are developed and that they are not such substantial changes that they would warrant a formal Change Request"*. Following that procedural decision, the Applicant confirms that the following documents have been updated and submitted to reflect the Changes:

- Outline Public Access Management Plan (8.17)
- Public Rights of Way Plan (2.10)
- Onshore Crossing Plan (2.18);
- Onshore Crossing Schedule (6.3.3.2);
- Draft Development Consent Order (3.1) and
- Schedule of Changes to the DCO (3.1.1)

(iv) **Updated dDCO**

The DCO and accompanying documents (Documents 3.1; 3.1.1; and 3.2) have been updated at this deadline as described in the Schedule of Changes to the DCO. This includes updates made as a result of on-going engagement with Interested Parties as well as general drafting changes made as articles are reviewed, drafting is improved, or requirements are developed and those highlighted in the Applicant's Change Notification dated 25 February 2025.

(v) **ISH5 and ISH6 Action Points**

Detail on how the actions are addressed is contained in the Applicant's Written Summaries of Oral Cases Put at the Issue Specific Hearing 5 and 6 (Documents 22.4 and 22.5) and The Applicant's Response to Actions Points recorded at ISH5 and ISH6 (Document 22.9). Depending on the nature of the Action Points and the length and nature of the response required by the Applicant, the Action Points have either been dealt with in the Hearing Summaries themselves, in Document 22.9, or in stand-alone notes. Where Action Points are not dealt with in Document 22.9 itself, Document 22.9 sets out where this information can be found.

(vi) **Report on the Implications for European Sites ("RIES")**

The Applicant agreed during ISH6 that it would respond to as many of the RIES questions as possible at Deadline 4a despite the formal examination deadline (Deadline 5). In Appendix 4 of Document 22.9 the Applicant has provided answers to as many of the RIES questions as it was able by Deadline 4a. The remaining questions will be responded to at Deadline 5.

The Applicant highlights the following additional points relating to future deadlines:

- (vii) **Further Benthic; Ornithology; HRA documents:** In line with its commitment to inform the ExA of its intention to submit further documents related to these topics at future deadlines, the Applicant notes:

*Deadline 5 submissions discussed at ISH2; ISH5; ISH6*

As discussed above, the Applicant will provide any remaining ES Chapter / Appendix updates related to these subjects at Deadline 5, having sought to deliver as many ES Chapter updates as possible at Deadline 4a.

*Other documents:*

In addition, as a result of extra mitigations provided by the Applicant at Deadline 4a, minor updates will be made to the Report to Information Appropriate Assessment.

As discussed in the Applicant's Change Notification dated 20 February 2025, 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. Should the Applicant proceed with these temporal piling restrictions, relevant documents will be updated and submitted accordingly.

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

Yours faithfully,

[REDACTED]

Development Manager  
Outer Dowsing Offshore Wind

Table 1 List of documents submitted at Deadline 4a, 26 February 2025

Applicant Reference	Document Title	Description / Reason for submission
Introductory documents		
22.1	The Applicant's Deadline 4a Covering Letter	Provided to guide the ExA’s review of Deadline 4a submissions
1.2	Guide to the Application	
Documents requested in ExA’s Rule 8(3) letter (PD-022)		
2.1	Works Plans Onshore	Requested in ExA’s Rule 8(3) letter (PD-022) (“Post-hearing submissions”. Submitted in response to ISH5 Action Point 30. <sup>1</sup>
2.2	Works Plans Offshore	
7.7.6*	Without Prejudice Additional Measures for Compensation of Guillemot and Razorbill	Requested in ExA’s Rule 8(3) letter (PD-022) (“Post-hearing submissions”. Submitted in response to ISH6 Action Point 3.
8.1*	Outline Code of Construction Practice	Requested in ExA’s Rule 8(3) letter (PD-022) (“Post-hearing submissions”. Submitted in response to ISH5 Action Points 9, 15; 20.
8.1.2*	Outline Air Quality Management Plan (“AQMP”)	Requested in ExA’s Rule 8(3) letter (PD-022) (“Post-hearing submissions”. Submitted in response to ISH5 Action Points 23.
8.1.3*	Outline Soil Management Plan	Requested in ExA’s Rule 8(3) letter (PD-022) (“Post-hearing submissions”. Submitted in response to ISH5 Action Points 15 and 19.

<sup>1</sup> Further information on how Action Points have been dealt with is set out in Document 22.9. Covering Letter Deadline 4a

Applicant Reference	Document Title	Description / Reason for submission
8.1.7*	Outline Organic Land Protocol	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions. Submitted in response to ISH5 Action Points 15.
8.3*	Offshore In-Principle Monitoring Plan	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to discussion of Invasive Non-native Species as detailed in Document 22.5 The Applicant's Written Summary of Oral Case Put at Issue Specific Hearing 6 held on 13 February 2025.
8.4*	Outline Project Environmental Management Plan	
8.5*	Outline Cable Specification and Installation Plan	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH6 Action Point 10.
8.6.1*	Outline Marine Mammal Mitigation Protocol (" <b>MMMP</b> ") for Piling Activities	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Following discussions at ISH6 the Applicant has updated the MMMPs to make the commitment wording clearer.
8.6.2*	Outline MMMP for Unexploded Ordnance	
8.10*	Outline Landscape and Ecological Management Strategy <sup>2</sup>	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH5 Action Points 9 and 10.
8.20*	Outline Vessel Management Plan (" <b>VMP</b> ")	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Following discussions at ISH6, and as discussed further in Document 22.3, the Applicant has updated this document to ensure the final VMP will include details of the Applicant's

<sup>2</sup> Confidential and non-confidential versions of this document have been provided.  
Covering Letter Deadline 4a



Applicant Reference	Document Title	Description / Reason for submission
		approach to marine coordination and engagement with owners and operators of other offshore assets.
8.21	Outline Scour and Cable Protection Management Plan	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH6 Action Point 10.
21.2	The Applicant's Responses to the Examining Authority's Written Questions 2	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). This document has been updated to including missing appendices discussed at ISH5/6. No other changes have been made.
21.8	The Applicant's Comments on Natural England's Risk and Issues Log	Requested in ExA's Rule 8(3) letter (PD-022) ("Comments on any other submissions received at Deadline 4").
21.16*	ORCP Design Principles Statement	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH5 Action Point 2.
22.2	The Applicant's Comments on Responses to Examining Authority's Written Questions 2	Requested in ExA's Rule 8(3) letter (PD-022) ("Comments on any other submissions received at Deadline 4").
22.3	The Applicant's Comments on Deadline 4 Submissions	Requested in ExA's Rule 8(3) letter (PD-022) ("Comments on any other submissions received at Deadline 4").
22.4	The Applicant's Written Summary of Oral Case Put at Issue Specific Hearing 5 held on 12 February 2025	Requested in ExA's Rule 8(3) letter (PD-022) ("written summaries of oral case put at hearings during w/c 10 February 2025").
22.5	The Applicant's Written Summary of Oral Case Put at Issue Specific Hearing 6 held on 13 February 2025	Requested in ExA's Rule 8(3) letter (PD-022) ("written summaries of oral case put at hearings during w/c 10 February 2025").

Applicant Reference	Document Title	Description / Reason for submission
22.6	[Not used]	
22.7	Clarification Note: Meaning and use of Best Endeavours	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH6 Action Point 6.
22.8	Wake Loss Methodology Clarification Note	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to ISH6 Action Point 15.
22.9	The Applicant's Response to Actions Points recorded at ISH5 and ISH6	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted in response to Action Points generally.
22.10	Applicant's Position on Natural England's Engagement in the Outer Dowsing Offshore Wind Examination	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Submitted as a result of Applicant commitment at ISH5 to provide its position on Natural England engagement as summarised in Document 22.4.
22.11	Sabellaria spinulosa reef supporting habitat Technical Note	Requested in ExA's Rule 8(3) letter (PD-022) ("Post-hearing submissions"). Provided in relation to discussions of supporting habitat at ISH6.
<b>ES Chapter updates</b>		
6.1.7*	Chapter 7 Marine Physical Processes	As discussed in this Covering Letter, the Applicant has submitted updates to ES Chapters in order to, where relevant, reflect: clarifications made to date during the Examination; corrections to errata; additional commitments made through Examination; and changes to status of or addition of cumulative projects.
6.2.7	Chapter 7 Marine Physical Processes Figures (Parts 1 and 2)	
6.3.9.2	Chapter 9 Appendix 2 Benthic Ecology Technical Report (ECC)	
6.3.9.6 (previously 15.13)	Chapter 9 Appendix 6 Envision Offshore Export Cable Corridor Sabellaria Spinulosa Reanalysis and Report	

Applicant Reference	Document Title	Description / Reason for submission
6.1.12*	Chapter 12 Offshore and Intertidal Ornithology	
6.2.12	Chapter 12 Offshore and Intertidal Ornithology Figures	
6.3.12.1	Chapter 12 Appendix 1 Intertidal and Offshore Ornithology Technical Baseline	
6.3.12.2	Chapter 12 Appendix 2 Collision Risk Modelling	
6.3.12.3	Chapter 12 Appendix 3 Displacement Assessment	
6.3.12.4	Chapter 12 Appendix 4 Population Viability Analysis	
6.3.12.5	Chapter 12 Appendix 5 Migratory Collision Risk Modelling	
6.3.12.7* (previously 19.8)	Chapter 12 Appendix 7 Levels of precaution in the assessment and confidence calculations for offshore ornithology	
6.3.12.8* (previously 19.9)	Chapter 12 Appendix 8 Consideration of bioseasons in the assessment of guillemot	
6.3.12.9* (previously 19.10)	Chapter 12 Appendix 9 Rates of displacement in guillemot and razorbill	
6.1.19*	Chapter 19 Onshore Air Quality	
6.2.19	Chapter 19 Onshore Air Quality Figures	
6.3.19.4*	Chapter 19 Appendix 4 Road Traffic Dispersion Modelling	
6.1.23*	Chapter 23 Geology and Ground Conditions	
6.2.23	Chapter 23 Geology and Ground Conditions Figures	

Applicant Reference	Document Title	Description / Reason for submission
6.3.23.1*	Chapter 23 Appendix 1 Preliminary Land Quality Risk Assessment	
6.1.24*	Chapter 24 Hydrology Hydrogeology and Flood Risk	
6.2.24	Chapter 24 Hydrology Hydrogeology and Flood Risk Figures	
6.3.24.1*	Chapter 24 Appendix 1 Groundwater Risk Assessment	
6.1.25*	Chapter 25 Land Use	
6.3.25.1	Chapter 25 Appendix 1 BMV Regional and National Context	
6.2.25	Chapter 25 Land Use Figures	
6.1.26*	Chapter 26 Noise and Vibration	
6.2.26	Chapter 26 Noise and Vibration Figures	
6.3.26.4*	Chapter 26 Appendix 4 Noise Model Outputs	
6.1.27*	Chapter 27 Traffic and Transport	
6.2.27	Chapter 27 Traffic and Transport Figures	
6.3.27.1*	Chapter 27 Appendix 1 Transport Assessment and Annexes A and I	
6.1.28*	Chapter 28 Landscape and Visual Assessment	
6.2.28	Chapter 28 Landscape and Visual Assessment Figures (Parts 1 – 3 of 15)	
6.1.29*	Chapter 29 Socio-Economic Characteristics	



Applicant Reference	Document Title	Description / Reason for submission
6.2.29	Chapter 29 Socio-Economic Characteristics Figures	
<b>Other Documents</b>		
2.0	Schedule of Changes for Plans	Updated to reflect changes to Plans made at this Deadline for the reasons set out against individual Plans.
2.10	Public Rights of Way Plan	Submitted following acceptance of changes submitted in <i>21.18 The Applicant's Change Notification</i> (REP4-123; submitted at Deadline 4) for the reasons set out therein.
2.18	Onshore Crossing Plan	Submitted following acceptance of changes submitted in <i>21.18 The Applicant's Change Notification</i> (REP4-123; submitted at Deadline 4) for the reasons set out therein. The electrical cables for the Triton Knoll Offshore Wind Farm have also been included, which were not identified by the utility search.
3.1*	Draft Development Consent Order	DCO updates made, as set out in the Schedule of Changes and reflected in the Explanatory Memorandum to the extent necessary, including as a result of on-going engagement with Interested Parties and drafting change made as articles are reviewed, drafting is improved, or requirements are developed
3.1.1	Schedule of Changes to the Draft DCO	
3.2*	Explanatory Memorandum	
6.3.3.2*	Onshore Crossing Schedule	Submitted following acceptance of changes submitted in <i>21.18 The Applicant's Change Notification</i> (REP4-123; submitted at Deadline 4) for the reasons set out therein. Electrical cables for the Triton Knoll Offshore Wind Farm have also been included, which, which were not were not identified by the utility search.

Applicant Reference	Document Title	Description / Reason for submission
8.2*	Outline Offshore Operations and Maintenance Plan	Submitted in response to on-going engagement with Natural England. The reasons for the update are set out in the Applicant's response to Natural England's Covering Letter at Deadline 4 (See Document 22.3, The Applicant's Comments on Deadline 4 Submissions)
8.13*	Schedule of Mitigation	Updated to capture updates to mitigations set out in documents submitted at Deadline 4a.
8.15*	Outline Construction Traffic Management Plan	Updated for consistency with the Chapter 27 Traffic and Transport to capture additional information (REP3-045; submitted at Deadline 3) provided in response to a request for further information by the ExA at ISH3 on 5 <sup>th</sup> of December 2025.
8.17*	Outline Public Access Management Plan	Submitted following acceptance of changes submitted in <i>21.18 The Applicant's Change Notification</i> (REP4-123; submitted at Deadline 4) for the reasons set out therein.
15.12*	iPCoD Interim Population Consequences of Disturbance Modelling Report	The Applicant has updated Tables 7-11 to correct the table labels in the updated version of Without Prejudice Additional Measures for Compensation of Guillemot and Razorbill (Document 7.7.6) submitted at Deadline 4a.
* indicates clean and tracked versions provided		

Table 2 Status of Engagement with certain IPs

Noting the discussion with the ExA at ISH 5 and 6 about the status of engagement with certain IPs, this Table provides an update on the status of engagement in short form.

Interested Party	Status of Negotiations
<b>MMO</b>	<p>The Applicant and the MMO have had two further meetings on 20 and 24 February 2025 to discuss the outstanding matters between the parties. Table 1.2 of the Applicant's Comments on Deadline 4 Submissions (Document 22.3) responds to each of the points raised by the MMO including identifying, where appropriate, the areas in which matters have progressed as a result of these further discussions.</p>
<b>TH Clements</b>	<p>The Applicant met with TH Clements on 19 and 20 of February to discuss the outstanding matters which were raised at ISH5 along with the action points set by the ExA. The Applicant has provided the following information to TH Clements:</p> <ul style="list-style-type: none"> <li>• The PCE briefing note (relating to Action Point 6 of EV4-008)</li> <li>• Overview of proposed updates to the oOLP, oSMP, oCoCP and the oAQMP</li> <li>• Severed land plans</li> <li>• Conceptual drainage plans (including a revised version at TH Clements request)</li> <li>• The Applicants position on all action points from ISH5.</li> </ul> <p>The Applicant has since attempted to arrange a meeting with TH Clements prior to D4a with the intention of closing out the above. It has not been possible to arrange a meeting prior to D4a. TH Clements provided some comments on matters relating to the oCoCP and oSMP on 25<sup>th</sup> February 2025 which are being considered by the Applicant.</p> <p>The Applicant continues seeking further meetings with TH Clements with a view to resolving as many outstanding points as possible before D5.</p>

Interested Party	Status of Negotiations
<b>Natural England</b>	<p>In relation to offshore matters:</p> <p>Following meetings in January and advice provided by Natural England to the Applicant at deadline 3, the further commitments have made by ODOW as discussed in Deadline 4a documents and as summarised below:</p> <ul style="list-style-type: none"> <li>• a commitment to the installation of removeable cable protection on defined areas of supporting habitat for <i>S. spinulosa</i> reef within the Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (“IDRBNR SAC”)</li> <li>• narrowing the options that may be pursued as compensation measures for impacts on the sandbank and biogenic reef features of the IDRBNR SAC;</li> <li>• 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</li> <li>• the introduction of a seasonal restriction for construction works related to the offshore export cable and the installation of the ORCP within the Greater Wash Special Protection Area to further mitigate impacts on overwintering red-throated diver.</li> </ul> <p>The Applicant awaits further feedback and hopes that commitments made will allow for the resolution of the matters to which they relate by Deadline 5.</p> <p>In relation to onshore matters:</p> <p>The Applicant has met with Natural England specifically to discuss the proposed mitigation at the Wash SPA, further details in respect of which are outlined in response to ISH5 Action Points 7 and 8 and additional wording added into the OLEMS.</p>