

Date: 04 April 2025  
Our ref: Case: 17783 Consultation: 506611  
Your ref: EN010130



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**BY WEBSITE PORTAL ONLY**

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Dear Sir/Madam,

**Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an Order Granting Development Consent for the Outer Dowsing Offshore Wind Project**

The following constitutes Natural England's formal statutory response for the Outer Dowsing Offshore Windfarm (ODOW) Examination Deadline 6.

**1. Natural England's Deadline 6 Submissions**

For Deadline 6, Natural England has reviewed the documents relevant to our statutory remit submitted by the Applicant at Deadline 5 on 13 March 2025. An update of Natural England's position regarding these documents is provided in Annex 1, including an indication where responses were deferred from a previous deadline. Natural England is submitting the following Appendices at Deadline 6:

- EN010130 506611 ODOW Appendix A1 - DCO and DML Deadline 6
- EN010130 506611 ODOW Appendix B4 - Natural England's Advice on Marine Processes Deadline 6
- EN010130 506611 ODOW Appendix B5 – Natural England's Comments on Marine Processes regarding the proposed ORCP Deadline 6
- EN010130 506611 ODOW Appendix C7 - Natural England's Advice on Benthic Ecology Deadline 6
- EN010130 506611 ODOW Appendix E4 - Natural England's Advice on Marine Mammals

#### Deadline 6

- EN010130 506611 ODOW Appendix F6 - Natural England's End of Examination Position on Offshore Ornithology Deadline 6
- EN010130 506611 ODOW Appendix G4 - Natural England's advice on ANS Kittiwake Breeding Season Lead-in Times Deadline 6
- EN010130 506611 ODOW Appendix G5 - Natural England's End of Examination Position on Offshore Ornithology Compensation Deadline 6 (**\*late submission on 08 April 2025**).
- EN010130 506611 ODOW Appendix I4 - Natural England's Advice on Onshore Ecology relating to Onshore Ornithology Deadline 6
- EN010130 506611 ODOW Appendix J6 - Natural England's NE Risk and Issues Log Deadline 6
- EN010130 506611 ODOW Appendix K4 – Natural England's Response to The Infrastructure Planning (Examination Procedure) Rules 2010 Rule 17 Letter 21 March 2025
- EN010130 506611 ODOW Appendix L1 – Natural England's Comments on the Offshore In-Principle Monitoring Plan Deadline 6

\*As confirmed with PINS, Natural England will be submitting a delayed response on the Applicant's ornithology compensation measures following Deadline 6, on 8<sup>th</sup> April 2025.

## **2. Natural England's Final Position**

The Risk & Issues log and PADSS within Appendix J6, submitted on 04 April 2025 at Deadline 6 represents Natural England's position at the close of the Examination. Further clarification of our final positions is also included within Appendices C7, E4, F6 and G5 submitted at Deadline 6.

## **3. Rule 17 Letter – Request for Information**

Natural England's response to The Infrastructure Planning (Examination Procedure) Rules 2010 Rule 17 Letter 21 March 2025 is included within Appendix K4.

## **4. Statement of Common Ground**

Natural England has reviewed the Applicant's SoCG for marine processes, benthic ecology, benthic compensation and marine mammals. For the other SoCG's, due to time constraints

and the volume and complexity of documents to review and provide advice and formulate our final position at Deadline 6, Natural England was unable to review and provide input to our position within these remaining SoCG documents in a timely manner.

Please be advised that Natural England's focus for Deadline 6 has been to provide advice to the documents submitted at Deadline 5 and as requested work directly with the Applicant on issue resolution.

It is Natural England's view that the final Principal Area of Disagreement Summary Statement (PADSS) and our Risks and Issue Log are an effective tool for the Examining Authority to understand where Natural England has determined issue resolution and where outstanding areas of disagreement remain and the implication of these.

## **5. Project Lifetime**

Natural England notes that the Applicant has stated in [REP5-016] that whilst 35 years has been assumed as a reasonable high-level estimate of the operational period, it has not been treated as an assumed limit to the operational lifetime of the development. Furthermore, it is stated that *"each relevant chapter author has considered the implications of a longer operational period in arriving at the relevant conclusions on likely significant effects and confirmed that the conclusions reported would remain the same after 35 years without new or different likely significant effects"* [REP5-016]. We advise that there are likely to be limits to the supporting evidence and therefore the appropriateness of the EIA and HRAs beyond 35 years, especially where modelling has been used. For the Applicant's assertion to be given weight, we consider that the Applicant's submissions would have needed to clearly demonstrate how they have considered the implications of a longer operational period within the impact assessment for marine physical processes, benthic ecology, marine mammals and offshore ornithology, including consideration of climate change impacts and increased storminess.

If at the time of consent this is unable to be demonstrated, we advise that an operational end date of 35 years is included within the dML, which we understand to be aligned with standard best practice for all non-Offshore wind marine licences. Whilst this is a new issue included within the Natural England's Risk and Issue Log Appendix J6 and PADSS, this has been discussed in this Examination since the first set of Examiners questions [ref. Q1 DCO 1.9]. It is also discussed in Appendix B4 as part of our Deadline 6 submission

For awareness, we note during discussions on this matter with the MMO, that this has highlighted a potential cross cutting issue with offshore windfarm marine licences. Natural England considers that there is a benefit to including an end date of the operational phase within the DCO/dML to ensure that it is clear that any repowering etc. would be subject to a new consent or variation, which would also require a full reassessment of impacts. Natural England notes this is also supported by the MMO. For awareness, Natural England will also be advising the inclusion of an operational end date on the dML for all OWF NSIPs Applications currently in examination.

## 6. Onshore Ecology and Onshore Ornithology

Since Deadline 5, Natural England has worked directly with the Applicant on outstanding issues in relation to onshore ecology and onshore ornithology matters. In response to our advice during this period, Natural England understands the Applicant will provide updates to several documents and plans at Deadline 6. For transparency our advice is included within Appendix I4.

In relation to this, Natural England's current position regarding Air Quality (dust monitoring) and commitments to monitoring of Noise Disturbance and mitigation measures within the latest Outline Landscape and Ecological Management Strategy (REP5-122, REP5-120), Outline Soil Management Plan (REP5-116), Outline Code of Construction of Practice (REP5-114) are set out within Appendix J6 Natural England's Risk and Issues Log, Tab H and Tab I.

## 7. In Principle Monitoring Plan (IPMP) [REP4a-074]

In Appendix L1 Natural England has outlined our overarching position regarding the latest version of the IPMP [REP4a-074], along with highlighting issues that remain outstanding from our advice provided at Deadline 3 and 5.

For any queries relating to the content of this letter please contact us using the details provided below.

Yours sincerely

Norfolk and Suffolk / Sussex and Kent

E-mail: E-mail: [REDACTED]@naturalengland.org.uk / [REDACTED]@naturalengland.org.uk

Telephone: [REDACTED]

Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines		
APP-058	6.1.3 Chapter 3 Project Description	Natural England has provided a response to this document in Appendix B4
REP5-149	23.3 The Applicant's Response to the Report on the Implications for European Sites (RIES).pdf	Natural England has no comments to make on this document
REP5-150	23.4 The Applicant's Comments on Deadline 4a Submissions.pdf	Natural England has no comments to make on this document
REP5-131	15.18 Statement of Commonality of Statements of Common Ground V5.pdf	Natural England has no comments to make on this document
REP5-008	6.1 Non-Technical Summary V2 (Tracked).pdf	Natural England has no comments to make on this document
REP5-010	6.1.3 Chapter 3 Project Description V2 (Tracked).pdf	Natural England has provided a response to this document in Appendix B4
REP5-016	6.1.5 Chapter 5 Environmental Impact Assessment Methodology V2 (Tracked).pdf	Please refer to Natural England's response to this document in Appendix B4
REP5-045	6.2.3 Chapter 3 Project Description Figures V2.pdf	Natural England has no comments to make on this document
REP5-047	6.2.5 Chapter 5 EIA Methodology Figures V2.pdf	Natural England has no comments to make on this document
REP5-065	6.3.5.2 Offshore Cumulative Effects Assessment V2 Tracked.pdf	Natural England has provided a response to this document in Appendix B4
REP5-067	6.3.5.3 Onshore Cumulative Effects Assessment Approach V2 (Tracked).pdf	Natural England has no comments to make on this document
REP5-034	6.1.17 Chapter 17 Seascape Landscape and Visual Impact Assessment V3 Tracked.pdf	Natural England has no comments to make on this document
REP5-036	6.2.18 Chapter 18 Marine Infrastructure and Other Users (Version 2) (Tracked)	Natural England has provided a response to this document in Appendix B4
REP5-057	6.2.17 Chapter 17 Seascape, Landscape and Visual Chapter Figures V2 Part 1 of 3.pdf	Natural England has no comments to make on this document
REP5-058	6.2.17 Chapter 17 Seascape, Landscape and Visual Chapter Figures V2 Part 2 of 3.pdf	Natural England has no comments to make on this document
REP5-059	6.2.17 Chapter 17 Seascape, Landscape and Visual Chapter Figures V2 Part 3 of 3.pdf	Natural England has no comments to make on this document

<b>Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines</b>		
REP5-124	8.13 Schedule of Mitigation V6 Tracked.pdf	Natural England has provided a response to this document in Appendix A1 and C7
REP5-104	7.1 RIAA V4 Confidential (Tracked).pdf	Natural England has provided a response to this document in Appendix E4.
REP5-101	7.1 RIAA V4 Redacted Clean.pdf	Natural England has provided a response to this document in Appendix F6
REP5-102	7.1 RIAA V4 Redacted Tracked.pdf	Natural England has provided a response to this document in Appendix B4.
REP4a-074	8.3 Offshore In-Principle Monitoring Plan V2 (Tracked)	Natural England has provided a response to this document in Appendix L1
<b>DCO</b>		
REP5-148	23.2 The Applicant's Comments on The Examining Authority's schedule of proposed changes to the draft Development Consent Order.pdf	Natural England has no comments to make on this document.
REP5-003	3.1 Draft Development Consent Order V9 Tracked.pdf	Natural England has provided a response to this document in Appendix A1
REP5-004	3.1.1 Schedule of Changes to the Draft DCO V8.pdf	Natural England has provided a response to this document in Appendix A1
REP5-006	3.2 Explanatory Memorandum V7 Tracked.pdf	Natural England has provided a response to this document in Appendix A1
<b>Onshore Ecology and Soils</b>		
REP5-040	6.1.21 Chapter 21 Onshore Ecology V2 (Tracked).pd	Natural England has no comments to make on this document
REP5-061	6.2.21 Onshore Ecology Figures (Part 1 of 2) V3.pdf	Natural England has no comments to make on this document
REP5-062	6.2.21 Onshore Ecology Figures (Part 2 of 2) V3.pdf	Natural England has no comments to make on this document
REP5-044	6.1.22 Chapter 22 Onshore Ornithology [CONFIDENTIAL] V2 Tracked.pdf	Natural England has no comments to make on this document
REP5-042	6.1.22 Chapter 22 Onshore Ornithology V2 Tracked.pdf	Natural England has no comments to make on this document

Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines		
REP5-063	6.2.22 Chapter 22 Onshore Ornithology Figures V2.pdf	Natural England has no comments to make on this document
APP-194	6.3.21.5 Chapter 21 Appendix 5 CONFIDENTIAL Badger Surveys V2 Tracked.pdf	Natural England has no comments to make on this document
REP5-090	6.3.22.2 Chapter 22 CONFIDENTIAL Ornithology Desk Study V2 Tracked.pdf	Natural England has no comments to make on this document
REP5-094	6.3.22.3 Chapter 22 Appendix 22.3 Winter Bird Survey 2022-2023 V2 (Part 3 of 4).pdf	Natural England has no comments to make on this document
REP5-093	6.3.22.3 Chapter 22 Appendix 22.3 Winter Bird Survey 2022-23 V2 (Part 2 of 4).pdf	Natural England has no comments to make on this document
REP5-095	6.3.22.3 Chapter 22 Appendix 22.3 Winter Bird Survey 2022-23 V2 (Part 4 of 4).pdf	Natural England has no comments to make on this document
REP5-092	6.3.22.3 Chapter 22 Winter Bird Survey 2022_23 Appendix V2 (Part 1 of 4) Tracked.pdf	Natural England has no comments to make on this document
REP5-096	6.3.22.7 Chapter 22 Appendix 22.7 Addendum Winter Bird Survey 2023 - 2024.pdf	Natural England has no comments to make on this document
REP5-097	6.3.22.8 Chapter 22 Appendix 22.8 Additional clarifications relating to Natural England's Relevant Representations (Appendix I Onshore Ornithology).pdf	Natural England has no comments to make on this document
REP5-114	8.1 Outline Code of Construction Practice V7 (Tracked).pdf	Natural England has no comments to make on this document. However, please refer to Appendix I4 for Natural England's advice to the Applicant's proposed Deadline 6 update.
REP5-116	8.1.3 Outline Soil Management Plan V6 (Tracked) (1).pdf	Natural England has no comments to make on this document. However, please refer to Appendix I4 for Natural England's advice to the Applicant's proposed Deadline 6 update.
REP5-122	8.10 Outline Landscape & Ecological Management Strategy V7 (Confidential Tracked).pdf	Natural England has provided an update to this document within Appendix J6 Risks and Issues Log
REP5-120	8.10 Outline Landscape & Ecological Management Strategy	Natural England has no comments to make on this document.

<b>Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines</b>		
	V7 (Tracked).pdf	However, please refer to Appendix I4 for Natural England's advice to the Applicant's proposed Deadline 6 update.
<b>Offshore and Intertidal Ornithology</b>		
REP4a-012	Environmental Statement (ES) Chapter 12 – Offshore Ornithology	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-030	ES Appendix 1 – Intertidal & Offshore Ornithology Technical Baseline	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-147	ES Appendix 2 Collision Risk Modelling V2	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-148	ES Appendix 3 Displacement Assessment V2	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-149	ES Appendix 4 Population Viability Analysis V2	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4-034	RIAA Offshore and Intertidal Ornithology Apportioning V3	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4-036	RIAA Ornithology Population Viability Analysis (Habitats Regulations Assessment) V3	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4-105	19.11 Lead-in Periods for Kittiwake Breeding on ANS V2 Tracked	Natural England has provided a response to this document in Appendix G4 at Deadline 6.
REP4-056	7.7.1 Kittiwake Compensation Plan Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4-058	7.7.2 Guillemot Compensation Plan Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4-059	7.7.3 Razorbill Compensation Plan V2 Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4-062	7.7.4 Offshore Artificial Nesting Structure Evidence Base and Roadmap V2 Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)



<b>Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines</b>		
REP4-064	7.7.5 Without Prejudice Predator Control Evidence Base and Road Map V3 (Tracked)	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4-066	7.7.6 Additional Measures for Compensation of Guillemot and Razorbill Tracked	Natural England has no comments to make on this document as it is superseded by REP4a-072. Please refer to row below for Natural England's comment in REP4a-072.
REP4a-072	7.7.6 Additional Measures for Compensation of Guillemot and Razorbill V2 (Tracked)	Natural England has no comments to make on this document as it is superseded by REP5-112. Please refer to row below for Natural England's comment in REP5-112.
REP5-112	7.7.6 Additional Measures for Compensation of Guillemot and Razorbill V3 Tracked.pdf	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4a-109	20.17 Guillemot and Razorbill Compensation Quanta V2 (Tracked)	Natural England has no comments to make on this document as superseded by REP5-144. Please refer to row below for Natural England's comment in REP5-144.
REP5-144	20.17 Guillemot and Razorbill Compensation Quanta V3 Tracked.pdf	This document has been considered in Natural England's final offshore ornithology position in Appendix G5 at Deadline 6 (late submission)
REP4a-049	6.3.12.7 Chapter 12 Appendix 7 Levels of precaution in the assessment and confidence calculations V2 Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-053	6.3.12.9 Chapter 12 Appendix 9 Rates of displacement in guillemot and razorbill V2 Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP4a-051	6.3.12.8 Chapter 12 Appendix 8 Consideration of bioseasons in the assessment of guillemot V2 Tracked	This document has been considered in Natural England's final offshore ornithology position in Appendix F6 at Deadline 6
REP5-153	23.7 Madsen and Searle Papers (Further Commentary).pdf	Natural England thanks the Applicant for providing this document. While Natural England has no comments to make on this document at Deadline 6 this will be reviewed internally for wider consideration.
REP5-126	8.18 Design Approach Document V3 (Tracked).pdf	Natural England has no comments to make on this document.
REP5-128	8.19 Design Principles Statement V3 (Tracked).pdf	Natural England has no comments to make on this document.
<b>Benthic</b>		

<b>Annex 1: Natural England's Response/Summary Position to the Applicant's Documents Submitted at Deadline 5 and those deferred from Previous Deadlines</b>		
REP5-118	8.5 Outline Cable Specification and Installation Plan V6 Tracked.pdf	Natural England has no comments to make on this document.
REP5-130	8.21 Outline scour protection management plan V4 Tracked.pdf	Natural England has provided a response to this document in Appendix C7
REP5-018	6.1.8 Chapter 8 Marine Water and Sediment Quality V3 Tracked.pdf	Natural England has no comments to make on this document.
REP5-020	6.1.9 Chapter 9 Benthic and Intertidal Ecology V2 Tracked.pdf	Natural England has provided a response to this document in Appendix B4 and C7
REP5-048	6.2.8 Chapter 8 Marine Water and Sediment Quality Figures V3.pdf	Natural England has no comments to make on this document.
REP5-049	6.2.9 Chapter 9 Benthic and Intertidal Ecology Figures V2.pdf	Natural England has no comments to make on this document.
REP5-146	22.11 Sabellaria spinulosa reef supporting habitat Technical Note V2 Tracked.pdf	Natural England has provided a response to this document in Appendix C7
REP5-106	7.6.1 Sandbank Compensation Plan V3 Tracked.pdf	Natural England has no comments to make on this document.
REP5-108	7.6.2 Without Prejudice Biogenic Reef Compensation Plan V3 Tracked.pdf	Natural England has no comments to make on this document.
REP5-110	7.6.3 Without Prejudice Benthic Compensation Evidence Base and Roadmap V3 Tracked.pdf	Natural England has no comments to make on this document.
<b>Marine Mammals</b>		
REP5-024	6.1.11 Chapter 11 Marine Mammals V2 Tracked.pdf	Natural England has provided a response to this document in Appendix E4
REP5-052	6.2.11 Chapter 11 Marine Mammals Figures V2.pdf	Natural England has no comments to make on this document.
REP5-071	6.3.11.2 Chapter 11 Appendix 2 Underwater Noise Assessment V2 Tracked.pdf	Natural England has no comments to make on this document.
REP4a-107	15.12 Interim Population Consequences of Disturbance Modelling Report V3 (Tracked)	Natural England has provided a response to this document in Appendix E4