

Outer Dowsing Offshore Wind

The Applicant's Deadline 6 Covering Letter

Deadline 6

Date: April 2025

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Project:		Whole Wind Farm		Sub Project/Package:		Whole Asset	
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4 April 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 6 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 at Issue Specific Hearing 8 (“ISH8”) and Compulsory Acquisition Hearing 2 (“CAH2”) the Applicant has provided additional documents for the reasons set out in Table 1 and highlighted in this letter. In case of use for the ExA and in order to summarise certain positions, the Applicant has summarised the status of negotiations with certain Interested Parties (“IPs”) in Table 2.

The Applicant highlights the following points regarding Deadline 6 submissions.

(i) **Habitats Regulation Assessment (“HRA”) and Compensation documents**

A number of final updates have been made to HRA and compensation documents for the reasons set out in Table 1. The key reason for final updates is to reflect final examination engagement with Natural England, discussed in detail in Document 24.2 The Applicant's Comments on Deadline 5 Submissions.¹ These updates are described in Table 1 as “Updates

¹ This includes updates to address Natural England’s request for the Applicant to include the total area of removable cable protection predicted within Annex I supporting habitat in relevant documents and to update documents in accordance with Natural England’s positions on auk compensation calculations, noise abatement systems, and its position on Adverse Effects on Integrity in relation to the Guillemot feature of the Farne Island Special Protection Area and the Seabird Assemblage feature of the Flamborough and Filey Coast Special Protection Area, both of which have been added to the Applicant’s derogation case on a without prejudice basis.

based on Natural England Engagement”. Certain HRA and Compensation documents have also been updated to reflect responses to the ExA’s Rule 17 letter (PD-028) which is discussed further in Document 24.7.

(ii) **Final dDCO**

The dDCO and accompanying documents (3.1; 3.1.1; and 3.2) have been updated and provided as final drafts at this deadline as requested. This includes the provision of the Validation Report (3.1.2) as requested. Amendments to the draft DCO at this deadline includes updates made as a result of on-going engagement with Interested Parties and general drafting changes made as articles are reviewed and drafting is improved and finalised.

(iii) **Updates to Plans and Compulsory Acquisition documents**

As part of the provision of the final Book of reference (“**BoR**”), the Applicant undertook a His Majesty’s Land Registry (“**HMLR**”) Refresh. Changes to ownership, occupation and persons with rights in relevant plots is reflected in the updated version of the BoR as well as the Statement of Reasons (“**SoR**”) and Land Rights Tracker submitted at this deadline. The Land Plans have also been updated to reflect the results of the HMLR Refresh.

Following receipt of refreshed utilities data, the Applicant’s Onshore Crossing Plan (2.18) and Onshore Crossing Schedule (6.3.3.2) has also been updated to reflect information received.

Finally, the Crown Land Plans Onshore have been updated to reflect a further Crown Land plot. This plot (as with all other Crown Land plot) is to be taken into account in the Crown Consent (discussed below).

None of these updates result in any changes to Order Limits.

(iv) **Crown Consent (Section 135 of the Planning Act 2008)**

Solicitors for TCE and the Applicant have drafted the following update regarding Crown Consent: *“Solicitors for The Crown Estate and the Applicant have now agreed the wording of the S.135 Consent documents and it is anticipated that these will be completed at or around the close of the Examination on 10 April 2025.”*

Further to this update, solicitors acting for TCE have confirmed that the S. 135 Consent Letter has received final approval and is being prepared for signing. On this basis, the Applicant is hopeful that the Crown Consent will be submitted into Examination as a late Deadline 6 submission in the course of next week and thanks the ExA for confirming at ISH8 that it would accept this.

The Applicant has requested that solicitors acting for TCE submit the signed Crown Consent when available.

(v) **Section 106 Agreement**

The Applicant is pleased to report that the scope of a Section 106 Agreement has been agreed between the Applicant and Lincolnshire County Council (“LCC”) and the Applicant will continue to progress the completion of the relevant land agreement at the onshore substation site with a view to entering into the Section 106 Agreement prior to the close of Examination.

It is proposed that the Section 106 Agreement will be secured over the site of the onshore substation. The Applicant is in the process of concluding its option agreement with the landowner, and the intention is for the draft Section 106 Agreement to be entered into by LCC, the landowner, and the Applicant.

However, as a fallback position in the event that the Section 106 Agreement cannot be completed prior to close of Examination, the Applicant has incorporated a new Requirement 33 (*Onshore Mitigation and Enhancement Scheme*) within the dDCO. This is accompanied by a new Outline Onshore Mitigation and Enhancement Principles Document (Document 8.25) (“**the Principles Document**”) which outlines the scope of the Section 106 Agreement.

Requirement 33 would prevent commencement of the onshore transmission works until an onshore mitigation and enhancement scheme, in accordance with the Principles Document, has been submitted to and approved by LCC. The Principles Document, which would be certified for the purposes of the Order, sets out the details of the agreed obligations and contributions, and that the method of delivery for these would be a Section 106 Agreement substantially in accordance with the current draft form.

In the event that the Section 106 Agreement can be entered into prior to the close of Examination, a copy of this will be provided together with an updated version of the dDCO with Requirement 33 deleted. This approach has been discussed and agreed with LCC.

(vi) **Statements of Common Ground (“SoCGs”)**

As set out in the Applicant’s Deadline 5 Covering Letter (REP5-147), a small number of SoCGs were subject to further consideration by IPs prior to finalisation.

Signed SoCGs have now been provided in relation to the Environment Agency, National Grid Electricity Transmission plc, the Marine Management Organisation and Royal Society for the Protection of Birds.

In relation to the Defence Infrastructure Organisation / Ministry of Defence, the Applicant regrets that it has not received a final SoCGs in time to submit at this deadline. The Applicant has therefore submitted a draft SoCG with Ministry of Defence.

In relation to Natural England, the Applicant has sought to progress SoCGs on all outstanding issues. The Applicant drafted and provided SoCGs on 25th March in the expectation that this

would provide sufficient time for Natural England to mark up and agree SoCGs with the Applicant. Natural England returned significantly altered SoCGs on 2nd and 3rd April which, regrettably, has left insufficient time for the Applicant to engage with, and enter into a final form of SoCGs with, the Interested Party. In order to seek to provide the ExA with information regarding the status of negotiations, the latest draft SoCGs with Natural England have been provided covering the topic areas discussed between parties. Where Natural England has provided a mark-up of the Applicant's SoCGs (covering the topics of Marine Physical Process; Benthic Ecology; Benthic Compensation; Marine Mammals) the Applicant has submitted the marked-up versions which contain Natural England's changes in tracked changes. Where Natural England has been unable to return SoCGs (covering the topics of the Applicant's DCO and dMLs; Ornithology; Ornithology Compensation; Onshore Ecology; Onshore Ornithology) the Applicant has submitted the versions of the SoCGs which it drafted and provided to Natural England for comment.

(vii) **Rule 17 Letter**

The Applicant has responded to the ExA's Rule 17 Letter (PD-028) in document 24.7. Where other examination documents have been updated on the basis of the questions posed in the Rule 17 letter, this is highlighted in Table 1 below.

(viii) **24.2 The Applicant's Comments on D5 Submissions**

Finally, the Applicant notes that, as is standard, it has responded to submissions made at the previous deadline (via the above-named document). As well as providing the applicant's comments on D5 responses, this version also includes responses to certain submissions made since deadline 5 including the Applicant's response to Natural England's "Discretionary Advice Service" advice provided on 28 March 2025.

(ix) **Protective Provisions**

The current status of all protective provisions in Schedule 18 of the draft DCO is set out in the Applicant's Closing Statements (Document 24.13). The Compulsory Acquisition and Land Rights Tracker (Schedule of Negotiations & Powers Sought) (Document 15.4, version 6) also provides this information against the individual statutory undertakers noted therein as having an interest in the land within the Order Limits.

If we can be of any further assistance, please contact [REDACTED] [REDACTED] (outerdowsing.com).

Yours faithfully,

[REDACTED]

Development Manager
Outer Dowsing Offshore Wind

Table 1 List of documents submitted at Deadline 6, 4 April 2025

Applicant Reference	Document Title	Description / Reason for submission
Introductory documents		
24.1	The Applicant's Deadline 6 Covering Letter	Provided to guide the ExA’s review of Deadline 6 submissions
1.2	Guide to the Application	
Documents requested in ExA’s Rule 8(3) letter (PD-022) or at Hearings (ISH8; CAH2)		
3.1*	Draft Development Consent Order	Requested in PD-022 (“Final draft DCO to be submitted by the Applicant in the SI template with the SI template validation report”)
3.1.1	Schedule of Changes to the Draft DCO	
3.1.2	Final Draft Development Consent Order Validation Report	Updates have been made to this version as a result of on-going engagement with Interested Parties, general drafting changes made as articles are reviewed and drafting is improved and finalised.
3.2*	Explanatory Memorandum	
4.1*	Book of Reference	Requested in PD-022 (“Final Book of Reference (BoR) and schedule of changes to BoR”).
4.1.1	Schedule of Changes to the Book of Reference	
6.1.25*	Chapter 25 Land Use	Provided in response to ISH8 Action Point 6. Requested in PD-022 (“Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025...”)
8.1*	Outline Code of Construction Practice	Provided in response to ISH8 Action Point 8. Requested in PD-022 (“Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025...”)

Applicant Reference	Document Title	Description / Reason for submission
8.1.2*	Outline Air Quality Management Plan	<p>Provided in response to discussion of the presentation of air quality mitigations (not recorded as a specific ISH8 Action Point) and to reflect ongoing discussions with Natural England and subsequent amendments made to commitments to resolve outstanding issues.</p> <p>Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>)</p>
8.1.3*	Outline Soil Management Plan	<p>Provided in response to ISH8 Action Point 8. Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>)</p>
8.10*	Outline Landscape and Ecological Management Strategy	<p>Provided in response to ISH8 Action Point 10. Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>) and to reflect ongoing discussions with Natural England and subsequent amendments made to commitments to resolve outstanding issues.</p>
8.10*	Outline Landscape and Ecological Management Strategy [CONFIDENTIAL]	
15.4*	Compulsory Acquisition and Land Rights Tracker (Schedule of Negotiations and Powers Sought)	Requested in PD-022 (<i>"Final Land Rights Tracker"</i>).
15.18	Statement of Commonality of Statements of Common Ground	Requested in PD-022 (<i>"Final signed and dated planning obligations and commercial side agreements tracker (if required)"</i>)
18.5	The Applicant's planning obligations and side agreements tracker	Requested in PD-022 (<i>"Final Statement of Commonality of Statements of Common Ground"</i>)
18.8	Statement of Common Ground with Environment Agency	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>), noting (i) that a previous version was signed and submitted at Deadline 5 but that (ii)

Applicant Reference	Document Title	Description / Reason for submission
		further outstanding issues have been agreed and a new version with updates related to those points submitted.
18.14.0 – 18.14.8	Draft Statements of Common Ground with Natural England (including Cover Letter)	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>), noting the points made above regarding the nature and extent of this SoCG.
18.15	Statement of Common Ground with NGET	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>).
18.17	Statement of Common Ground with the Marine Management Organisation (MMO)	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>).
18.18	Draft Statement of Common Ground with the Ministry of Defence	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>).
18.19	Statement of Common Ground with the RSPB	Requested in PD-022 (<i>"Completed, signed and dated Statements of Common Ground"</i>).
19.6*	Inter-relationship report	Requested in PD-022 (<i>"Final report on the inter-relationship with other infrastructure projects"</i>)
21.8	The Applicant's Comments on Natural England's Risk and Issues Log	Requested in PD-022 (<i>"Comments on any other submissions received at Deadline 5"</i>)
24.2	The Applicant's Comments on Deadline 5 Submissions	Requested in PD-022 (<i>"Comments on any other submissions received at Deadline 5"</i>)
24.3	The Applicant's Comments on Responses to the RIES	Requested in PD-022 (<i>"Comments on any other submissions received at Deadline 5"</i>)
24.4	The Applicant's Written Summary of oral case put at Compulsory Acquisition Hearing 2 held on 19 March 2025	Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>)
24.5	The Applicant's Written Summary of oral case put at Issue Specific Hearing 8 held on 19 March 2025	Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>)

Applicant Reference	Document Title	Description / Reason for submission
24.6	The Applicant's Response to Action Points recorded at CAH2 and ISH8	Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>)
24.7	The Applicant's Response to the Rule 17 Requests	Requested in PD-022 (<i>"Any further information requested by the ExA under Rule 17 of the Examination Procedure Rules"</i>)
24.8	The Applicant's Close of examination progress tracker	Requested in PD-022 (<i>"Applicant's Close of Examination Progress Tracker"</i>)
24.9	Lincs Protective Provisions Plan	Provided as part of providing final draft DCO at Deadline 6
24.10	Race Bank Protective Provisions Plan	Provided as part of providing final draft DCO at Deadline 6
24.11	DEL protective provisions plan	Provided as part of providing final draft DCO at Deadline 6
24.12	The Applicant's Submissions on Wake Loss Matters	Provided in response to ISH8 Action Points 1 – 3. Requested in PD-022 (<i>"Post-hearing submissions including written summaries of oral case put at hearings during w/c 18 March 2025..."</i>). For the Applicant's full response to these APs, please see Document 24.6.
24.13	The Applicant's Closing Statements	Requested in PD-022 (<i>"Applicant's Close of Examination Progress Tracker"</i>)
Other Documents		
2.0	Schedule of Changes for Plans	Updated to reflect changes to plans updated at this deadline.
2.5	Land Plans (Parts 1 and 2)	Updates to reflect HMLR Refresh
2.6	Crown Land Plans Onshore	Updated to reflect additional Crown Land plot
2.18	Onshore Crossing Plan	Updated to update utilities information

Applicant Reference	Document Title	Description / Reason for submission
4.3*	Statement of Reasons	Updated in tandem with changes to BoR and Land Rights Tracker updated at Deadline 6.
6.1.9*	Chapter 9 Benthic and Intertidal Ecology	Updates based on Natural England Engagement
6.1.11*	Chapter 11 Marine Mammals	Updated in response to Q3 (<i>"Potential effects on mammals at the EIA level"</i>) Rule 17 PD-028
6.3.3.2*	Onshore Crossing Schedule	Updated to update utilities information
6.3.11.3	Interim Population Consequences of Disturbance Modelling Report (Cumulative)	Updated in response to Rule 17 (PD-028) Q3 (<i>"Potential effects on mammals at the EIA level"</i>)
7.1*	Report to Inform Appropriate Assessment	Updates based on Natural England Engagement
7.1*	Report to Inform Appropriate Assessment [Confidential]	
7.1.2*	Ornithology Population Viability Analysis (Habitats Regulations Assessment)	Updates based on Natural England Engagement
7.5*	Derogation case	Updates based on Natural England Engagement
7.6.2*	Without Prejudice Biogenic Reef Compensation Plan	Updates based on Natural England Engagement
7.6.3*	Without Prejudice Benthic Compensation Evidence Base and Roadmap	Updates based on Natural England Engagement
7.7.1*	Kittiwake Compensation Plan	Updates based on Natural England Engagement
7.7.2*	Without Prejudice Guillemot Compensation Plan	Updates based on Natural England Engagement
7.7.3*	Without Prejudice Razorbill Compensation Plan	Updates based on Natural England Engagement
7.7.4*	Offshore Artificial Nesting Structures Evidence & Road Map	Updates based on Natural England Engagement

Applicant Reference	Document Title	Description / Reason for submission
7.7.5*	Without Prejudice Predator Control Evidence & Road Map	Updates based on Natural England Engagement
7.7.6*	Without Prejudice Additional Measures for Guillemot and Razorbill Evidence and Road Map	Updates based on Natural England Engagement
8.3*	Offshore In-Principle Monitoring Plan	Updates based on Natural England Engagement
8.5*	Outline Cable Specification and Installation Plan	Updates based on Natural England Engagement
8.6.1*	Outline Marine Mammal Mitigation Protocol for Piling Activities	Updates based on Natural England Engagement
8.6.2*	Outline Marine Mammal Mitigation Protocol for Unexploded Ordnance	Updated in response to Rule 17 (PD-028) Q4 (<i>"Commitment to the use of noise abatement systems"</i>)
8.7*	In Principle Southern North Sea Special Area of Conservation Site Integrity Plan	Updates based on Natural England Engagement
8.21*	Outline Scour and Cable Protection Management Plan	Updates based on Natural England Engagement
8.24	Spawning Herring Piling Restriction Plan	Submitted in response to engagement with the MMO regarding herring mitigation
8.25	Onshore Mitigation and Enhancement Principles Document	New document corresponding to the Applicant completing a Section 106 Agreement with LCC as discussed above.
8.13*	Schedule of Mitigation	Updated to reflect additional mitigations set out in documents submitted at Deadline 6.
20.17*	Guillemot and Razorbill: Compensation Quanta	Updates based on Natural England Engagement
21.21	NGET Protective Provisions Plan	Updates to reflect the final Protective Provisions agreed with NGET included in the draft DCO at Deadline 6
22.11*	Sabellaria spinulosa reef supporting habitat Technical Note	Updates based on Natural England Engagement

Applicant Reference	Document Title	Description / Reason for submission
23.6*	Wood Thilsted Wake loss note	Updated, to reflect the inclusion of a “no build” zone for the Dudgeon Extension Project and to include points of clarification following further discussion with the Orsted IPs.
24.14	Letters of Consent to Disapplication of Legislation	Letters of consent to the disapplication of certain legislative provisions, following the agreement of Protective Provisions with the Environment Agency, Lindsey Marsh Internal Drainage Board (IDB), Black Sluice IDB, Witham Fourth District IDB, Welland and Deepings IDB and South Holland IDB.
* indicates clean and tracked versions provided		

Table 2: Status of engagement with certain IPs

This Table provides the status of engagement with certain IPs at Deadline 6.

Interested Party	Status of engagement at D6
MMO	<p>The Applicant and the MMO have continued to engage via email up to and including 4th April 2025 on outstanding matters and in relation to finalising a SoCG.</p> <ul style="list-style-type: none"> • The Applicant and the MMO most recently met on Thursday 27th March 2025 to discuss the extent of a proposed herring spawning restriction. • The MMO confirmed to the Applicant on 2nd April 2025 that it was in agreement with the Applicant in relation to the temporal and spatial extent of the Applicant's proposed array area herring spawning restriction. • The MMO confirmed to the Applicant on 4th April 2025 that Condition 25, Schedule 10 (Deemed licence under the 2009 Act – generation assets) in relation to the piling restriction for spawning herring was now agreed. • The Applicant and the MMO signed a Statement of Common Ground on 4th April 2025.
TH Clements	<p>Following Deadline 5, CAH2, and ISH8 the Applicant and TH Clements have continued to engage productively. The following areas of disagreement have been discussed and actioned:</p> <ul style="list-style-type: none"> • Both the outline code of construction practice and outline soil management plan, submitted at D6, are now in agreed form. • The outline air quality management plan has been reviewed by both parties and the version submitted at deadline 6 is agreed by both parties. • The Applicant has addressed TH Clement's concerns regarding automatic rights to claim compensation by providing TH Clements with a unilateral Deed as outlined in point 5 of table 38 in 24.2 The Applicant's Comments on Deadline 5 Submissions. <p>The Applicant has continued to seek a voluntary agreement with TH Clements which includes provision for costs associated with mitigation land, including provision for mitigation land associated with potential dust impacts, despite the Applicant's assessment indicating there will be no significant dust impacts outside the Order Limits once mitigation measures are in place. The parties have not reached agreement in this regard but will continue discussions post Examination with the hope to reach a voluntary agreement.</p>

Interested Party	Status of engagement at D6
Natural England	<p data-bbox="427 300 831 331">In relation to onshore matters:</p> <ul data-bbox="479 341 2029 651" style="list-style-type: none"> <li data-bbox="479 341 2029 453">• The Applicant has sought to engage with Natural England in respect of amendments to the OLEMS to resolve any outstanding concerns in relation to potential disturbance to non-breeding waterbirds and Breeding Schedule 1 birds within Anderby Marsh LWT reserve and non breeding waterbirds using (potentially) functionally linked land. <li data-bbox="479 459 2029 571">• The Applicant has engaged with Natural England in respect of their comments on noise guidance. The Applicant has committed to developing a programme of noise monitoring to assist Natural England with its data gathering activities, aiming to enhance the scientific knowledge base on this topic. <li data-bbox="479 577 2029 651">• The Applicant has engaged with Natural England in respect of Air Quality and committed to agree locations for dust deposition modelling in consultation with Natural England. <p data-bbox="427 699 2029 772">In relation to offshore matters, the Applicant has continued to seek to engage with Natural England via email and most recently meeting with Natural England on Monday 31st March 2025 on the following topics:</p> <ul data-bbox="479 820 2029 1396" style="list-style-type: none"> <li data-bbox="479 820 2029 1283">• In relation to offshore ornithology, the Applicant presented the outcomes of the re-quantification of auk compensation numbers based on new advice on Natural England’s preferred approach provided to the Applicant at Deadline 5. This demonstrates the Applicant could provide sufficient compensation up to a ratio of 2:1 using the NE approach and is detailed in the Applicants response to deadline 5 submissions (document reference 24.2). The relevant updates to the RIAA, based on Natural England’s Deadline 5 advice were also confirmed as having been made. The Applicant also discussed DAS advice received from Natural England on the 28.3.2025 regarding Natural England’s view on increasing confidence in the effectiveness of the package of auk compensation measures (this advice is provided in the Applicant’s Comments on Deadline 5 Submissions (document reference 24.2)). The Applicant’s view is that the majority of these points would be covered in the post consent phase if necessary. Nonetheless, as detailed in Table 1, documents 7.5-7.7.6 have been updated at Deadline 6 to respond to Natural England’s concerns and include updated advice despite the late stage at which this information has been provided to the Applicant. <li data-bbox="479 1331 2029 1396">• In relation to benthic ecology, the Applicant and Natural England confirmed agreement on the extent of the Annex I supporting habitat mapped as detailed within the Sabellaria spinulosa reef supporting habitat Technical Note

Interested Party	Status of engagement at D6
	<p>(Document reference 22.11) and confirmed that the relevant documents as detailed in Table 1 would be updated at Deadline 6. At Natural England’s request the Applicant also presented the total area of removable cable protection predicted within Annex I supporting habitat. Natural England were unable to agree that this volume would be sufficient to avoid AEol but were not able to offer any advice on what an appropriate volume would be. The Applicant’s position remains that this volume represents a realistic Worst Case Scenario and that AEol can be ruled out.</p> <ul style="list-style-type: none"> • In relation to marine mammals, Natural England confirmed to the Applicant via email that its concerns in relation to the seal feature of the Wash and North Norfolk Coast SAC would be resolved if the Applicant committed to the use of noise abatement systems. The Applicant has subsequently updated the Outline Marine Mammal Mitigation Protocol for Piling Activities (document reference 8.6.1 version 6 submitted at Deadline 6) and In Principle Southern North Sea Site Integrity Plan (document reference 8.7 version 4 submitted at Deadline 6) to reflect a strengthening of its existing committed to use primary and/or secondary noise reduction methods (noise abatement systems). The Applicant sought further engagement on the drafting of this commitment with Natural England, but Natural England were unwilling to engage further and stated the matter should be left to the Secretary of State (pers comm). • Detailed of the SoCG position is as set out above.