



To:

GT R4 Limited (Outer Dowsing Offshore Wind Farm)
Natural England
Department for Environment Food and Rural Affairs
Ørsted IPs
Equinor IPs

Our Ref: EN010130

Date: 21 October 2025

Dear Sir or Madam,

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

Application by GT R4 Limited (“the Applicant”) for an Order granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm (“the Proposed Development”)

REQUEST FOR INFORMATION

1. Following the completion of the Examination on 10 April 2025, the Examining Authority submitted a Report and Recommendation in respect of its findings and conclusions on the above application to the Secretary of State on 10 July 2025.
2. On 12 August 2025, the Secretary of State requested information from specific parties (“the first information request”). On 6 October 2025, the Secretary of State invited all Interested Parties (“IPs”) to comment on the responses received. The deadline for comments on the responses received from the first information request is 23:59 on 5 November 2025.
3. The Secretary of State would be grateful if the following parties could provide updates or information as appropriate in response to the queries set out in this letter: **the Applicant, Natural England, the Department for Environment Food and Rural Affairs (“Defra”), the Ørsted IPs and the Equinor IPs**. The deadline for responses for Part A of this information request is **24 October 2025**. The deadline for responses in Part B of **this information request is 23:59 on 7 November 2025**.

Part A

4. The Secretary of State notes that in response to question 7 of the first information request, Natural England advise that *"these mitigation measures are used throughout the IDRBNR SAC we further highlight use of this mitigation would also address many of our concerns raised in relation to NERC, 2006 Priority Habitats*

outside of designated sites". **Natural England** is invited to clarify its position and explain whether it is advising that 1) the existing proposed mitigation measures address their concerns in relation to NERC Priority Habitats outside of designated sites; or 2) additional commitments to mitigation measures outside of designated sites should be made to resolve their concerns in relation to Priority Habitats.

Part B

Benthic ecology, intertidal, subtidal and coastal effects

5. The Secretary of State notes that the Applicant and Natural England agree on the extent of supporting habitat for Annex 1 *Sabellaria spinulosa* Reef ("supporting habitat") within the Export Cable Corridor that overlaps with the Inner Dowsing, Race Bank and North Ridge ("IDRBNR") Special Area of Conservation ("SAC"). He also notes continued disagreement on the likely extent of cable protection required by the Proposed Development and therefore the Worst Case Scenario ("WCS") impact to this supporting habitat from habitat loss due to the placement of that cable protection.
 - a. The **Applicant** is requested to provide further explanation of the approach used to determine their position of a 20% WCS for cable protection on this supporting habitat; including the method employed to calculate the expected cable protection requirement and the evidence used to reach this conclusion.
 - b. Noting that in [REP6-147] and in response to the first information request Natural England raised its concern that *"given the inherent difficulty found by neighbouring cable installations with installing cables to a sufficient depth within the prevailing sediment type for this predominantly mixed sediment habitat, a 20% WCS is not realistic."* And that it considers *"that the WCS of cable protection required across the supporting habitat for Annex 1 Sabellaria spinulosa reef, should be higher, somewhere between 20% (95,407m²) and 100% (477,036m²)"*. **Natural England** is requested to provide evidence to support this position that should include, but not necessarily be limited to, further detail of the neighbouring cable burial projects such as: the expected WCS and realised cable protection requirements for those projects; why sufficient burial was not achieved; and how this information is applicable to the Proposed Development.
6. The Secretary of State notes the Applicant's commitment to the use of a precise disposal method for sediment return within the offshore Export Cable Corridor and within the IDRBNR SAC as presented in their Response to the Request for Information (Document Reference: 27.2). The **Applicant** is requested to update the wording in the Cable Specification and Installation Plan, the Outline Biogenic Reef Mitigation Plan and the Schedule of Mitigation, to specify this return will be *"upstream"* of the original dredge location, to align with the advice they present from Natural England.
7. The Secretary of State also notes the Applicant's commitment that *"As part of the routing design, a working separation distance (50 m buffer) will be maintained from Sabellaria spinulosa reef features to limit the potential for impacts to arise*

from sediment deposition” in its response the first information request (document 27.2) The **Applicant** is requested to update the wording in the Cable Specification and Installation Plan, the Outline Biogenic Reef Mitigation Plan and the Schedule of Mitigation by removing the wording “where possible”, to ensure these documents reflect that commitment.

8. The Secretary of State notes the updates made to Section 3.1 (Physical Processes) of the Applicant’s proposed Offshore In-Principle Monitoring Plan (Document 8.03). **Natural England** is invited to comment on these updates and confirm the following:
 - a. Whether those updates, alongside the updates made to the maximum design scenario for nearshore cable protection in the Applicant’s Outline Scour Protection and Cable Protection Management Plan (Document 8.21) and the Outline Cable Specification and Installation Plan (Document 8.5), provide sufficient commitment to rule out an Adverse Effect on the Integrity of the Wash and North Norfolk Coast SAC due to changes in physical process; as indicated in Annex 1 of Natural England’s response to the first information request (Ref: 523323).
 - b. Whether those updates, alongside the addition of the Offshore Reactive Compensation Platform (“ORCP”) Restriction Area, as proposed in the Applicant’s ORCP Physical Process Assessment Clarification Notes (Document Reference: 27.8), provide sufficient commitment to rule out an Adverse Effect on the Integrity of the IDRBNR SAC due to changes in physical process; as indicated in Point 9 and Annex 1 of Natural England’s response to the first information request (Ref: 523323).

Offshore infrastructure – Wake effects

9. The Secretary of State notes that following the first information request, the Ørsted and Equinor IPs provided their preferred protective provisions as part of their response. The **Ørsted and Equinor IPs** and the **Applicant** are therefore invited to provide an update on whether any further engagement has been had on this matter and if any agreement has been reached on the most recent protective provisions.

Offshore and Intertidal Ornithology

Predator Eradication in Jersey (Plémont Seabird Sanctuary) as Compensation for Guillemot and Razorbill

10. The Applicant’s response to question 19 of the first information request states that *“predator control in the Plémont area has been listed as likely to succeed in the draft Collaboration in Offshore wind Strategic Compensation (COWSC) Predator Reduction Implementation and Monitoring Plan. As such, the COWSC group ... consider that predator control is likely to be effective at Plémont,”*. **Defra** is invited to confirm this.
11. The Secretary of State notes that the Applicant’s without prejudice compensation package for impacts to guillemot and razorbill includes 'additional compensation

measures in the South-West' that may be carried out in collaboration with other wind farm developers, including Five Estuaries and North Falls. The Secretary of State also notes that Natural England recently provided advice (NE reference: 27347/519205)¹ in response to Part 2 of the Secretary of State's first request for information for the Five Estuaries Offshore Windfarm. That advice stated Five Estuaries was recommended to adopt the North Falls approach to calculating compensation quanta (i.e. considering philopatry) to ensure calculation consistency across projects which may share compensation.

12. Given that the Applicant also proposes this shared measure in collaboration with those same projects, **Natural England** is invited to comment on whether it would be appropriate for the Applicant to provide the same calculations i.e. using the Hornsea 4 method but presented to show the proportion likely to disperse into the NSN, using a 0.17 natal dispersal rate for razorbill from Lavers *et al.* (2007)² and the 0.58 rate for guillemot from Horswill and Robinson (2015)³. Furthermore, if these calculations are advised, **Natural England** are requested to confirm if it is appropriate for the Applicant to apply the above method only to the measures in the southwest, or across their wider proposed compensation package.
13. **Natural England** are invited to comment on the Applicant's submissions to the Secretary of State's first information request in relation to the Plémont Predator Eradication Measure, including the "Without Prejudice Predator Control Evidence Base and Roadmap" (Document Reference 7.7.5), "Guillemot and Razorbill: Compensation Quanta" (Document Reference 20.17) and the Applicant's Response to the Request for Information (Document Reference 27.2). Amongst other points, **Natural England** are invited to specifically comment on whether the Applicant's commitment of extending the extent of predator control measures to the 14ha of public land and National Trust Jersey land to the south and west of the fenced area is satisfactory to resolve their concerns surrounding the scale of the measure, and the ability for the measure to avoid predator reinvasion.
14. **Natural England** are requested to provide any commentary on the "Plémont Seabird Sanctuary Biodiversity Research 2017-2024" (document reference 27.3), submitted by the Applicant. **Natural England** are requested to comment on whether the report assuages any of their concerns raised in [REP6-151].

Other Offshore and Intertidal Ornithology

15. Noting the advice provided in Natural England's response to the first information request which states that the method outlined in Rhoades *et al.* (2025)⁴ is a more ecologically robust method of calculating ornithological compensation than

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-001863-C1-020-response-from-Natural-England.pdf>

² Lavers, L. J., Jones, I. L. and Diamond, A. W., (2007). Natal and breeding dispersal of Razorbills (*Alca torda*) in eastern North America. *Waterbirds*, 30; 588-594.

³ Horswill, C., and Robinson R. A. (2015), 'Review of seabird demographic rates and density dependence', JNCC Report No. 552.

⁴ Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H. 2025. Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms. BTO Research Report 778, BTO, Thetford, UK.

previously used methods/formulae, the Secretary of State requests that the **Applicant** works with **Natural England** to apply the British Trust of Ornithology method outlined in *Rhoades et al.* to their calculations for kittiwake compensation.

16. The Secretary of States notes that the Applicant updated their compensation calculations for guillemot and razorbill following advice from Natural England, found in Appendix C of Document 27.2. For clarity, the Secretary of State requests that the **Applicant** provides updated versions of Tables 3-7 of their “Guillemot and Razorbill: Compensation Quanta” document (document reference 20.17) which shows the compensation numbers for both species when calculated with both the mean and Upper Confidence Interval (UCI) values, and both a 70:2 and a 50:1 displacement:mortality ratio.
17. In line with the request found in Natural England’s response to the first information request, the **Applicant** is requested to amend Tables 8 and 9 of “Guillemot and Razorbill: Compensation Quanta” (document reference 20.17) to include the values for the predicted contribution of each site in the South West to the total of 1900 pairs for guillemot and 255 pairs for razorbill presented by the Applicant, and confirmation on which sites are still under consideration. Furthermore, the **Applicant** is requested to provide clarification of whether any revised calculations of potential for each site provided in response to the above request are based on data from both the 2024 and 2025 surveys or the 2024 surveys only.
18. Noting the Applicant’s response to question 29 of the first information request, the Secretary of State has again reviewed the figures for colony sizes of Kittiwake, Guillemot and Razorbill at Flamborough and Filey Coast (“FFC”) Special Protection Area (“SPA”), referenced within the Applicant’s Offshore Artificial Nesting Structures Evidence Base and Roadmap (document reference: 7.7.4 versions 3 and 4), and compared this to the data presented in the Seabird Monitoring Programme Database⁵ for the same site and the data contained in Clarkson *et al.* (2022)⁶ which the Secretary of State believes to be the original report of the latest full colony counts of the SPA.
19. To the Secretary of State, it appears that the 2022 colony figures presented in the Seabird Monitoring Programme Database for FFC SPA are not representative of the whole SPA – they appear to present only the Flamborough Head and Bempton Cliffs colony data and do not include the Filey Cliffs colony data. As such, it appears the colony counts presented in document 7.7.4 are not representative of the whole SPA as, being based on the Seabird Monitoring Programme Database data, they only present data from Flamborough Head and Bempton Cliffs. The Applicant’s data sources for FFC SPA colony sizes appear to be inconsistent across documents as its Report to Inform Appropriate Assessment [REP6-028] appears to present colony counts that are representative of the whole SPA; citing “Butcher et al. (2023)” as the source. However [REP6-028] does not include a full reference

⁵ Accessed online 6/10/2025 at: <https://app.bto.org/seabirds/public/data.jsp>

⁶ Flamborough & Filey Coast SPA: 2022 seabird colony count and population trends (accessed online 6/10/2025 at: <https://yorkshiremarinenaturepartnership.org.uk/wp-content/uploads/2022/11/Flamborough-and-Filey-Coast-SPA-seabird-colony-count-2022.pdf>)

for this citation. It may be that the Applicant is referring to FFC SPA Seabird Monitoring Programme 2023 Report⁷ authored by Butcher et al.

20. However, that report does not appear to contain the cited figures. Without this reference the Secretary of State is unclear on the source of the cited data. To ensure the Secretary of State has access to the clear and consistent information required to help determine the current application, the **Applicant** is therefore requested to:

- a. review again the colony count figures for Kittiwake, Razorbill and Guillemot in document 7.7.4 and where appropriate update these figures to ensure they are representative of the whole FFC SPA (i.e. including both Flamborough Head and Bempton Cliff colony and the Filey Cliff colony); and
- b. check across all relevant documents to ensure the correct figures are used consistently for these species across those documents; and update any calculations that had previously used incomplete or inaccurate colony data.

Marine Mammals

21. The **Applicant** is invited to clarify its commitment to the use of a soft-start procedure during the installation of part or fully driven pile foundations. This should include explanation of a) whether a soft-start procedure will be used at all times; or b) any relevant scenarios if this commitment is not possible. The position should be updated in the outline Marine Mammal Mitigation Plan and any other relevant control documents.

Other HRA Matters

22. In addition to specific requests earlier in this letter, the Applicant is requested to provide an update on any other progress that has been made with developing its proposed ornithology compensation measures since the close of examination.

Onshore Ecology

23. In line with Natural England's discretionary advice found in Appendix E of the Applicant's Response to the Request for Information (Document Reference 27.2), the **Applicant** is requested to amend their outline Soil Management Plan [REP6-061] to state that mowing and stripping "will" be avoided during wet conditions, rather than "*should*".

Compulsory Purchase and Temporary Acquisitions - Book of Reference

24. The Secretary of State has reviewed the most updated version of the Applicant's Book of Reference submitted on 10 July 2025 with the Book of Reference submitted at Deadline 6 and found multiple inconsistencies, including changes to land plots and ownership.

25. For verification purposes, several documents submitted at Deadline 6 of Examination, including the Schedule of Changes, Land Plans, Compulsory Acquisition and Land Rights Tracker must be cross-referenced with the updated

⁷ Accessed online 6/10/2025 at: <https://yorkshiremarinenaturepartnership.org.uk/wp-content/uploads/2023/10/FFC-SPA-Seabird-Monitoring-Programme-Report-2023.pdf>

Book of Reference (V9). The Secretary of State requires **the Applicant** to submit a document that clearly outlines any changes in the Book of Reference and Compulsory Acquisition and Lands Rights Tracker, also explaining how these relate to the other documents provided at Deadline 6 (close of Examination) - Schedule of Changes and Land Plans. **The Applicant** is required to provide evidence confirming consultation with landowners affected by these changes. **The Applicant** should also specify whether any of the changes to the Book of Reference have altered the Order Limits.

26. **Responses to the requested information should be submitted by email only to OuterDowsingOffshoreWind@planninginspectorate.gov.uk by 23.59 on 7 November 2025.**

27. Responses will be published on the Outer Dowsing Offshore Windfarm project page of the National Infrastructure Planning website: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130> as soon as possible after **7 November 2025**.

28. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the Outer Dowsing Offshore Windfarm or any part of the project. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully

John Wheadon

Head of Energy Infrastructure Planning Delivery

Department of Energy Security & Net Zero