

Date: 24 October 2025  
Our ref: 530814  
Your ref: EN010130



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**BY EMAIL ONLY**

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Dear Sir/Madam,

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010  
Application by Outer Dowsing Offshore Wind Farm Limited ("the Applicant") for an Order  
granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm  
("Project")**

The following constitutes Natural England's formal statutory response to the Secretary of State's Request for Further Information (RFI) dated 10 October 2025 Part A.

Natural England has been invited by the Secretary of State to comment upon:

*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 2 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*

To inform our advice, Natural England has reviewed the following documents submitted by the Applicant to the SoS on 09 September 2025:

- 8.22 Outline Biogenic Reef Mitigation Plan V4.0
- 8.5 Outline Cable Specification and Installation Plan V8.0

**Natural England's Advice:**

Natural England recognises that the mitigation measures are set out slightly differently within the respective Outline Biogenic Reef Mitigation Plan V4.0 and the Outline Cable Specification and Installation Plan V8.0 submitted by the Applicant to the SoS on 09 September 2025 and therefore this may have caused some ambiguity regarding which mitigation is required within and outside the designated site ('IDRBNR SAC') to meet NERC, 2006 requirements for priority habitats. In the

case of ODOW project, the NERC, 2006 priority habitat identified is *Sabellaria spinulosa* reef.

Natural England advises that providing the following best practice benthic mitigation, as put forward by the Applicant, is clearly and appropriately set out within these documents and within the Schedule of Mitigation, then our concerns specifically in regard to benthic mitigation for habitats protected under NERC, 2006 and The Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) are addressed.

However, it remains unclear to Natural England at this stage how mitigation measures within and outside the IDRBNR SAC are to be secured by the DCO and/or updated named plan. We advise this is considered further to ensure the mitigation measures are adequately secured as part of the consent.

#### 1) 8.5 Outline Cable Specification and Installation Plan

The following sets out Natural England's expectation for mitigation within and outside the IDRBNR SAC and we advise the Outline Cable Specification and Installation Plan is updated accordingly to clearly set out this distinction.

##### *Within and Outside a Designated Site*

- Where reasonably practicable, subsea cable burial will be the preferred option for cable protection. Cable burial will be informed by the cable burial risk assessment (CBRA) and Burial Assessment Study as developed during the pre-construction engineering;
- Cable burial will be aligned with best industry practice, where burial has not been achieved, the project may consider additional burial attempts with specific tools where it is considered feasible and effective. Remedial works will be considered where no other option is considered practical;
- Cables will be installed to a target burial depth of at least 1m, informed by the findings of a CBRA;

##### *Within IDRBNR SAC*

- Any material dredged within IDRBNR SAC will be deposited back within the IDRBNR SAC.
- If any dredging of sediment for sandwave clearance is required within the IDRBNR SAC, the material removed from the SAC will be placed within the offshore ECC, within the IDRBNR SAC via a sediment return methodology suitable to ensure that material is returned within the same sediment cell, *upstream of the original dredge location*, using a precise disposal method via discharge pipe(s), downpipe(s) or equivalent. *(Please note, the inclusion of upstream is in line with Natural England's understanding of agreement with the Applicant and with the SoS 10 October 2025 RFI Question 6).*
- Cables will be micro-sited around any known Annex I *Sabellaria spinulosa* reef within the IDRBNR SAC.
- As part of the routeing design, a working separation distance (50m buffer) will be maintained from Annex I *Sabellaria spinulosa* reef features within IDRBNR SAC to limit the potential for impacts to arise from direct damage and/or sediment deposition. *(Please note this is in line with Natural England's understanding of agreement with the Applicant and with the SoS RFI Question 7).*
- No jack-up vessels will be used within the Inner Dowsing, Race Bank and North Ridge IDRBNR SAC.
- During boulder clearance activities, where boulders are grabbed and moved, boulders will

be placed nearby in an area of similar habitat and not in a linear formation and all areas of known Annex I *Sabellaria spinulosa* reef within the Inner Dowsing, Race Bank and North Ridge IDRBNR SAC will be avoided.

- Any cable protection required over the Annex I Sandbank feature within the Inner Dowsing, Race Bank and North Ridge IDRBNR SAC will be removable (i.e. mattresses or rock bags or other demonstrably removable protection).
- Any cable protection required on defined areas of supporting habitat for the Annex I *Sabellaria spinulosa* reef within the IDRBNR SAC, shown on Figure 1, will be removable.

#### *Outside IDRBNR SAC*

- Cables will be micro-sited around biogenic reef, where practicable.
- As part of the routeing design, a working separation distance (50m buffer) will be maintained from *Sabellaria spinulosa* reef features to limit the potential for impacts to arise from sediment deposition. *(Please note the removal of where possible would ensure that avoidance of NERC habitat aligns with commitments made by the aggregates industry)*
- In the event that disposal of dredged sediment (associated with seabed preparation works or cable installation) is required, material will be deposited, upstream, within an area of similar sediment characteristics, in close proximity to the dredge location, in order to retain sediment within the sediment transport system. *(Please note that the inclusion of a targeted/precise deposal option is not included here. Whilst this option is always considered ideal from an ecological perspective, we recognise that along long export cable routes that other factors are likely to outweigh any benefit outside of a site)*
- During boulder clearance activities, where boulders are grabbed and moved, boulders will be placed nearby in an area of similar habitat, in a non-linear formation, and avoid any *Sabellaria spinulosa* reef, where practicable.
- HDD will be utilised for the landfall drill to avoid interactions with surface features by installing ducts under the intertidal area to exit pits which will be located a minimum of 500m offshore from MLWS. The HDD will be of sufficient depth to have no effect on the beach.
- If cable protection is required in the nearshore (defined as the inner depth of closure out to 7.1m water depth), concrete mattresses will be utilised and will not be greater than 0.35m in height, a description of concrete mattresses is set out in Section 6.11.5.2 of ES Chapter 3 Project Description (APP-058).

#### 2) 8.22 Outline Benthic Reef Mitigation Plan

Natural England advises that the Outline Benthic Reef Mitigation Plan is updated accordingly to provide a distinction between expected mitigation within and outside the IDRBNR SAC as follows:

#### *Within IDRBNR SAC*

- Within the SAC, the Project will microsite infrastructure (including grabbed boulders) around areas of Annex I biogenic reef.
- As part of the routeing design, a working separation distance (50 m buffer) will be maintained from Annex I *Sabellaria spinulosa* reef features to limit the potential for impacts to arise from sediment deposition.
- The Project will ensure that no infrastructure is installed, and no ancillary works are to be undertaken within the defined Marine Management Organisation Byelaw area within the IDRBNR SAC.
- If any dredging of sediment for sandwave clearance is required within the IDRBNR SAC,

the material removed from the IDRBNR SAC will be placed within the offshore ECC, within the IDRBNR SAC via a sediment return methodology suitable to ensure that material is returned within the same sediment cell, upstream, using a precise disposal method via discharge pipe(s), downpipe(s) or equivalent.



*Outside IDRBNR SAC*

- Outside the SAC, Project infrastructure (including grabbed boulders) will be microsituated around Annex I biogenic reef as far as practicable.
- As part of the routeing 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.

Natural England advises our response to Part B of the SoS RFI dated 10 October 2025 will be provided on or before the deadline of 07 November 2025.

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

Yours faithfully,

  
Norfolk and Suffolk Area Team  
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