

Outer Dowsing Offshore Wind

The Applicant's Response to RFI2 and All Parties Consultation Covering Letter

Response to the Second Request for Information and All Parties Consultation

Date: October 2025

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1.0	October 2025	Response to the Second Request for Information and All Parties Consultation	Outer Dowsing	Shepherd & Wedderburn	Outer Dowsing	Outer Dowsing	

Secretary of State for Energy Security and Net Zero
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29 October 2025

Dear Sir,

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 (the “Application”)
Application Reference: EN010130

In the documents submitted alongside this Covering Letter (set out in Table 1), the Applicant has responded to your Second Request for Information (“RFI”) of 10 October 2025 and your request for all Interested Parties to comment on responses to the First RFI of 6 October 2025 (the “**All Parties Consultation**”). Below the Applicant has provided its initial response to your Third RFI of 29 October 2025.

In Document 28.2 the Applicant has provided its written response to each request asked of it in the Second RFI. In Document 28.3 the Applicant has commented on other Interested Parties’ responses to the First RFI where necessary as requested. Further, to assist the Secretary of State, the Applicant has set out in Document 28.4 a list of each document submitted alongside this Covering Letter with an explanation for the reason for its submission.

Secretary of State’s Third Request for Information

Benthic ecology, intertidal, subtidal and coastal effects

As set out in Document 28.4, the Applicant has updated the Outline Cable Specification and Installation Plan and the Outline Biogenic Reef Mitigation Plan, along with the Schedule of Mitigation to align with the previously agreed to mitigation measures as now collated and set out in Natural England’s response (C3-002).

InterGen’s Gas pipeline infrastructure

Following acceptance of the application for Examination, the Applicant notified InterGen (UK) Limited, Spalding Energy Company Limited and Spalding Energy Expansion Limited under section 56 of the Planning Act 2008. Outwith statutory consultations and notifications, the Applicant contacted InterGen and Spalding Energy entities directly on a number of occasions to ascertain whether they had any comments on the Applicant’s proposals. No responses were received. These parties have had ample opportunity to review the proposals and engage in the Examination of the Application.

The draft DCO provides standard protective provisions for electricity, gas, water and sewerage undertakers in Part 1 of Schedule 18 (C1-016). These provisions apply for the protection of all gas undertakers, which will include InterGen UK Limited, Spalding Energy Company Limited and Spalding Energy Expansion Limited, to the extent there is any interaction between the Project and gas undertakers' apparatus. As such, appropriate protective provisions are already incorporated into the DCO.

The Applicant requests that a copy of InterGen's response is published urgently.

Timescales for the Secretary of State's Decision

The Applicant notes that the deadline for the Secretary of State's decision on the Application has been extended by four months from 10 October 2025 to 10 February 2025 *"to allow time to request further information that was not provided for consideration during the examination period and to give all interested parties the opportunity to review and comment on such information"*. This was on the basis that *"applications for consent for energy projects submitted under the Planning Act 2008 must meet the necessary standards."*

The Secretary of State has now made further requests for information that was not previously provided, he has also given all interested parties the opportunity to review and comment on such information in the All Parties Consultation. If the Applicant receives sight of the further representation by InterGen by no later than 31 October the Applicant will be in a position to provide any further response by 7 November 2025. With the Applicant's submission today and those submissions of the Applicant and Interested Parties by, at latest 7 November 2025, the Applicant considers that the Secretary of State will have before him all information required to make a decision on the Application in terms of Part 6 Chapter 5 of the Planning Act 2008. There has been no indication that the Application does not meet "the necessary standards".

The Application is for nationally significant low carbon infrastructure. Government policy in NPS EN-1 and EN-3 concludes that there is a "Critical National Priority" for developing it.

The National Policy Statements explain that there is an urgent need for Critical National Priority ("**CNP**") infrastructure and therefore support its delivery as soon as possible. The Secretary of State is required to "assess all applications for development consent of the types of infrastructure covered by [NPS EN-1] on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent" (NPS EN-1 3.2.6). There is an "urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible" (NPS EN-1 3.3.58). Government "strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible" (NPS EN-1 3.3.64). As paragraph 4.2.2 of NPS EN-1 puts it: "Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale."

NESO's Clean Power 2030 Advice further articulates the urgency of developing additional offshore wind generating capacity. Delivering on the Clean Power 2030 Action Plan's targets *"requires a dramatic acceleration in progress compared to anything achieved historically and can only be achieved with a determined focus on pace and a huge collective effort across the industry"*. The

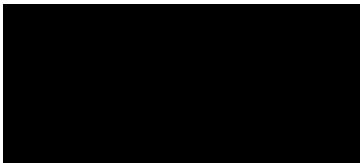
Government's Clean Power 2030 Action Plan states that "accelerating delivery is exceptionally critical for offshore wind".

Policy clearly points towards the exceptionally critical need for acceleration of projects such as the Outer Dowsing Offshore Wind farm to allow them to be delivered as soon as possible and at a pace commensurate with the "dramatic acceleration in progress" advocated. The Secretary of State's swift determination of the Application is a vital part of the delivery of the Applicant's project.

Efficiency and certainty of timescales in decision-making are critical to secure continued investment and unlock the economic growth opportunities that developments such as the Applicant's project offer.

In this context, there is a clear and significant public interest benefit in the Secretary of State's determination being made "as soon as possible" rather than being made at the end of the extended deadline.

Yours faithfully,



Greg Tomlinson
Development Manager
Outer Dowsing Offshore Wind

Table 1 List of documents submitted on 29 October 2025

Applicant Reference	Document Title
Note: * indicates where clean and tracked versions have been submitted	
New Documents	
28.1	The Applicant's 24 October Submission Covering Letter
28.2	The Applicant's Response to the Second Request for Information
28.3	The Applicant's Response to the All Parties Consultation
28.4	Submission Documents Summary and Change Log
28.5	The Applicant's Response to the Second Request for Information – Wake effects
Updated Documents	
7.7.1*	Kittiwake Compensation Plan
7.7.2*	Guillemot Compensation Plan
7.7.3*	Razorbill Compensation Plan
7.7.4*	Offshore Artificial Nesting Structures Evidence Base and Roadmap
7.7.6*	Additional Measures for Compensation of Guillemot and Razorbill
8.1.3*	Outline Soil Management Plan
8.5*	Outline Cable Specification and Installation Plan
8.13*	Schedule of Mitigation
8.22*	Outline Biogenic Reef Mitigation Plan
20.17*	Guillemot and Razorbill: Compensation Quanta