

# Outer Dowsing Offshore Wind

## Submission Documents Summary and Change Log

### Response to the Second Request for Information and All Parties Consultation

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## Acronyms & Definitions

### Abbreviations / Acronyms

Abbreviation / Acronym	Description
ANS	Artificial Nesting Structure
BTO	British Trust for Ornithology
CIEEM	Chartered Institute of Ecology and Environmental Management
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
EGL	Eastern Green Link
FFC	Flamborough and Filey Coast
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
IDRBNR	Inner Dowsing, Race Bank and North Ridge
MMO	Marine Management Organisation
IROPI	Imperative Reasons of Over-Riding Public Interest
NAS	Noise Abatement Systems
NE	Natural England
NGET	National Grid Electricity Transmission
NSIP	Nationally Significant Infrastructure Project
ODOW	Outer Dowsing Offshore Wind
OLEMS	Outline Landscape and Ecological Management Strategy
ORCP	Offshore Reactive Compensation Platform
SAC	Special Area of Conservation
SMP	Soil Management Plan
SPA	Special Protected Area
SPCPMP	Scour Protection and Cable Protection Management Plan

### Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation, Total Energies and Gulf Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation (and its affiliates), TotalEnergies and GULF.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the sensitivity of the receptor, in accordance with defined significance criteria.

Term	Definition
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Offshore Reactive Compensation Platform (ORCP)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents) housing electrical reactors and switchgear for the purpose of the efficient transfer of power in the course of HVAC transmission by providing reactive compensation
Outer Dowsing Offshore Wind (ODOW)	The Project.
Pre-construction and post-construction	The phases of the Project before and after construction takes place.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.

## 1 Introduction and Document Purpose

1. This document has been produced by the Applicant to detail the changes to documents that have been previously submitted and have now been amended in response to the Second Request for Information (“**RFI2**”). This information is set out in Table 1 below.
2. No new documents have been requested by the Secretary of State in response to RFI2. Five new documents have however been submitted at this deadline for the following reasons:
  - Document 28.1 is the Applicant’s Covering Letter.
  - Document 28.2 provides the Applicant’s written response to each request asked of it in the RFI2.
  - Document 28.3 provides the Applicant’s comments on other Interested Parties’ responses to the first RFI where necessary as requested.
  - This document (28.4) provides the aforementioned list of document changes to assist the Secretary of State.
  - Document 28.5 provides the Applicant’s comments on the matter of wake effects in response to paragraph 9 of RFI2.

Table 1 Changes detailed for updated documents

Document Reference	Document Title	Changes	Relevant paragraph of RFI2
7.7.1	Kittiwake Compensation Plan	Updates to incorporate the Rhoades et al 2025, British Trust for Ornithology approach to calculating compensation quanta.	15
7.7.2	Guillemot Compensation Plan	<p>A summary of the changes made to each section of this document is presented below:</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>Text has been added that summarises all relevant changes submitted for the 24 October deadline concerning the most recent RFI from the Secretary of State.</li> </ul> <p><b>Section 2.1</b></p> <ul style="list-style-type: none"> <li>The methodology for the calculation of compensation potential at the shortlisted sites has been refined following an approach discussed and agreed with Natural England on 23 October 2025 as the best available method at this time and is described in Annex 2 of Document 7.7.6. Tables 2.4 and 2.5 have been updated according with the refined methodology. To present the compensation potential using two years' data, as requested in the RFI, the potential combined benefits (measured in adult pairs) has been averaged across 2024 and 2025.</li> </ul>	16 & 17
7.7.3	Razorbill Compensation Plan	<p>A summary of the changes made to each section of this document is presented below:</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>Text has been added that summarises all relevant changes submitted for the 24 October deadline concerning the most recent RFI from the Secretary of State.</li> </ul> <p><b>Section 2.1</b></p> <ul style="list-style-type: none"> <li>The methodology for the calculation of compensation potential at the shortlisted sites has been refined following an approach discussed and agreed with Natural England on 23 October 2025 as the best available method at this time and is described in Annex 2 of Document 7.7.6. Tables 2.3 and 2.4 have been updated according with the refined methodology. To present the compensation potential using two years' data, as requested in the RFI, the potential combined benefits (measured in adult pairs) has been averaged across 2024 and 2025.</li> </ul>	16 & 17
7.7.4	Offshore Artificial Nesting Structures Evidence Base and Roadmap	As requested by the Secretary of State, the Applicant met with Natural England on 23 October 2025, discussed the application of the BTO method, and it has been applied throughout the document.	15
7.7.6	Additional Measures for Compensation of Guillemot and Razorbill	<p>A summary of the changes made to each section of this document is presented below:</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>Text has been added that summarises all relevant changes made in response to RFI2.</li> </ul> <p><b>Section 7.1</b></p> <ul style="list-style-type: none"> <li>The methodology for the calculation of compensation potential at the shortlisted sites has been refined following an approach discussed and agreed with Natural England on 23 October 2025 and is described in Annex 2 of this document. Tables 7-1 and 7-2 have been updated according with the refined methodology. In addition, clarification has been added to paragraphs 251 and 252 that detail the realistic and conservative assumptions behind the refined methodology.</li> <li>2025 survey data has been added to Tables 7.1 and 7.2 as requested in the RFI.</li> <li>Tables 7-3 and 7-4 have been added to show the total potential compensation at each surveyed site across both 2024 and 2025, as requested in the RFI.</li> </ul> <p><b>Annex 1</b></p> <ul style="list-style-type: none"> <li>In light of the request by the Secretary of State for confirmation of the sites in the south-west of England which remain under consideration (see reference 17 in RFI2), the compensation potential at the long-list of sites in the southwest has been removed to reduce complexity and better highlight the assessment of Outer Dowsing's impacts against the potential compensation at its shortlisted sites. Therefore, only the compensation potential at Outer Dowsing's shortlisted sites has been included.</li> </ul> <p><b>Annex 2</b></p> <ul style="list-style-type: none"> <li>The methodology for the calculation of compensation potential at the shortlisted sites has been refined following an approach discussed and agreed with Natural England on 23 October 2025 as the best available method at this time and the re-written</li> </ul>	17

Document Reference	Document Title	Changes	Relevant paragraph of RFI2
		<p>methodology is now presented. A detailed breakdown of the calculations has been provided, along with the full results of compensation potential across the suite of sites for razorbill and guillemot based on 2024 and 2025 site surveys.</p> <ul style="list-style-type: none"> <li>The calculation of the compensation potential at each site results in an output measured in individual fledglings. To assess the potential against compensation requirements (measured in the number of adult pairs), individual fledglings were converted into adult pairs using the national average productivity rates. This conversion has been corrected with Natural England's updated demographic rates. Tables 10-1 and 10-2 have been updated according with the refined methodology.</li> <li>2025 survey data has been added to Tables 10-3 and 10-4 as requested in the RFI.</li> </ul>	
8.1.3	Outline Soil Management Plan	Statements that mowing and stripping "should" be avoided during wet conditions updated to "will" be avoided.	23
8.5	Outline Cable Specification and Installation Plan ("CSIP")	<p>Updates have been made:</p> <ul style="list-style-type: none"> <li>in response to paragraph 7 of Secretary of State's second RFI, to remove "where possible" from the <i>Sabellaria spinulosa</i> reef working separation distance (50m buffer) commitment.</li> <li>to incorporate the changes to commitment wording and order in which the commitments are set out, in response to the requests made by Natural England in their submission C3-002 - Responses to Secretary of State consultation 3 Part A.</li> </ul>	4, 7
8.13	Schedule of Mitigation	<p>Updates have been made:</p> <ul style="list-style-type: none"> <li>in response to paragraph 6 of the Secretary of State's second RFI, to specify that the commitment to return being "upstream" of the original dredge location is committed to in both the CSIP and BRMP.</li> <li>to incorporate the changes to commitment wording, requested by Natural England in their submission C3-002 - Responses to Secretary of State consultation 3 Part A, and to ensure consistency with the changes made to the Outline Cable Specification and Installation Plan, and the Outline Biogenic Reef Mitigation Plan.</li> <li>commitment 162 has been updated to state that mowing and stripping <b>will</b> be avoided during wet conditions.</li> <li>for completeness the Schedule of Mitigation has also been updated to ensure all CSIP and Outline Biogenic Reef Mitigation Plan mitigations are reflected.</li> </ul>	4, 6, 23
8.22	Outline Biogenic Reef Mitigation Plan ("BRMP")	<p>Updates have been made :</p> <ul style="list-style-type: none"> <li>to respond to paragraph 6 and 7 of the Secretary of State's second RFI, to specify this return will be "upstream" of the original dredge location and to remove "where possible" from the <i>Sabellaria spinulosa</i> reef working separation distance (50m buffer) commitment.</li> <li>to incorporate the changes to commitment wording and order in which the commitments are set out, in response to the requests made by Natural England in their submission C3-002 - Responses to Secretary of State consultation 3 Part A.</li> </ul>	4, 6, 7
20.17	Guillemot and Razorbill: Compensation Quanta	<p>A summary of the changes made to each section of this document is presented below:</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>Text has been added that summarises all relevant changes made in response to RFI2.</li> </ul> <p><b>Section 3.2</b></p> <ul style="list-style-type: none"> <li>As per the RFI (paragraph 16), tables 3-8 have been updated to show the compensation numbers for both species when calculated with both the mean and UCI values, and both a 70:2 and 50:1 displacement : mortality ratio. These figures have not been updated. Rather, tables were reformatted for clarity.</li> </ul> <p><b>Section 4.1</b></p> <ul style="list-style-type: none"> <li>The methodology for the calculation of compensation potential at the shortlisted sites has been refined and is described in Annex 2 of Document 7.7.6. This updated methodology was agreed with Natural England as appropriate given the data available on the sites on 23<sup>rd</sup> October 2025.</li> <li>Tables 8 and 9 have been updated according with the refined methodology. To present the compensation potential using two years' data, as requested in the RFI, the potential combined benefits (measured in adult pairs) has been averaged across 2024 and 2025 for both species.</li> <li>Tables 10 and 11 have been updated to reflect the compensation potential calculated with the refined methodology. The ratio of compensation requirement to potential has also been updated following the above changes.</li> </ul>	16, 17



Document Reference	Document Title	Changes	Relevant paragraph of RFI2
		<ul style="list-style-type: none"><li>The compensation potential has been updated in paragraph 76 according to the refined methodology.</li></ul>	