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MMO Reference: DCO/2021/00003
Planning Inspectorate Reference: EN010130
Identification Number: 20048765

05 November 2025

Dear John Wheadon,

**Planning Act 2008, GTR4 Limited, Proposed Outer Dowsing Offshore Windfarm Order
All Interested Parties Consultation**

On 02 May 2024, the Marine Management Organisation (the MMO) received notice under Section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate ("PINS") had accepted an application made by GTR4 Limited (the Applicant) for determination of a Development Consent Order (DCO) for the construction, maintenance and operation of the proposed Outer Dowsing Offshore Wind Farm (the DCO Application) (MMO ref: DCO/2021/00003; PINS ref: EN010130). The DCO includes Deemed Marine Licences (DMLs) in Schedules 10, 11, 12, 13, 14, 15 and 16.

The DCO Application seeks authorisation for the construction, operation and maintenance of Outer Dowsing offshore wind farm (OWF), comprising of up to 100 wind turbine generators together with associated onshore and offshore infrastructure and all associated development (the Project).

This document comprises comments in respect of the DCO Application, in response to the request for further information issued by the Secretary of State for Energy Security & Net Zero on 06 October 2025.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.



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Yours sincerely,



Melissa Westerby
Marine Licensing Case Officer

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1. Draft Development Consent Order (DCO) Tracked (C1-017)

- 1.1 The MMO has provided comments on the most recent updates to the DCO/DMLs (Version 13) in Table 1 below.
- 1.2 The MMO notes other changes to the DCO which references Lincolnshire County Council (LCC) as the lead onshore regulator. The MMO will liaise with LCC in the post-consent phase for the intertidal area.
- 1.3 The MMO would like to highlight that our main office has now changed. The Deemed Marine Licences (DMLs) 10-16, Part 1, 4(a) will need to be amended to the following:

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Table 1. Table detailing MMO's comments on the most recent updates to the DCO/DMLs (Version 13).

DCO Reference	Applicant comments	Change made	DCO Version	MMO comment
Schedule 1, Part 3, Requirement 32	The Applicant has amended requirement 32, as requested by the Ministry Of Defence in their Deadline 5 submission (REP5-177).	<p>Ministry of Defence Radar Mitigation Surveillance Operation</p> <p>32.—(1) No wind turbine generator forming part of the authorised development is permitted to rotate its rotor blades on its horizontal axis until the Secretary of State, having consulted with the Ministry of Defence, confirms satisfaction in writing that appropriate mitigation, if required, will be implemented and maintained for the life of the authorised development and that arrangements have been put in place with the Ministry of Defence to ensure that the approved mitigation is implemented.</p> <p>(2) For the purposes of this requirement—“appropriate mitigation” means measures to prevent or remove any unacceptable adverse effects which the authorised development will have on the air defence radar capability of(s) at Remote Radar Head (RRH) Staxton Wold and Remote Radar Head (RRH) Neatishead, and the Ministry of Defence’s air surveillance and control operations that they support; “approved mitigation” means the detailed Radar Mitigation Scheme (RMS) that will set out the appropriate measures and timescales for implementation as agreed with the Ministry of Defence at the time the Secretary of State confirms satisfaction in</p>	13	The MMO notes this change and has no comments.

		<p>writing in accordance with sub-paragraph (1); and “Ministry of Defence” means the Ministry of Defence as represented by Defence Infrastructure Organisation – Safeguarding, St George’s House, DIO Headquarters Head Office, DMS Whittington, Lichfield, Staffordshire, WS14 9PY or any successor body. (3) The undertaker must thereafter comply with all other obligations imposed on the undertaker (if any) contained within the approved mitigation for the life of the authorised development.</p>		
<p>Schedule 10, Part 1, Paragraph 1</p> <p>Schedule 11, Part 1, Paragraph 1</p>	<p>The applicant has removed the definition of Centre for Environment Fisheries and Aquaculture Science (Cefas) as it has not been used.</p>	<p>“Cefas” means the Centre for Environment, Fisheries and Aquaculture Science or any successor body to its function;</p>	13	<p>The MMO notes this change and agrees that this definition should be removed.</p>
<p>Schedule 10, Part 2, Condition 13(1)(f)</p> <p>Schedule 11, Part 2, Condition 13(1)(f)</p>	<p>The Applicant has updated the wording of this condition following consultation with the MMO and Natural England.</p>	<p>(f) In the event that driven or part-driven pile foundations are proposed to be used, a marine mammal mitigation protocol in accordance with the outline marine mammal mitigation protocol (piling), the intention of which is to prevent injury to marine mammals, following current best practice as advised by the relevant statutory nature conservation body, to be submitted to the MMO at least six months prior to commencement of piling activities. The marine mammal mitigation protocol must include consideration of deployment of noise mitigation systems or noise</p>	10,13	<p>The MMO welcomes this change.</p>

		abatement systems that will be utilised to manage sounds from those piling activities. The marine mammal mitigation protocol must include full details and justification for the mitigation chosen or excluded for deployment.		
Schedule 10, Part 2, Condition 13(1)(j)	The Applicant has updated the wording of this condition following consultation with the MMO.	(j) In the event that driven or part-driven pile foundations are proposed to be used, a spawning herring piling restriction plan (in accordance with the outline spawning herring piling restriction plan) containing updated underwater noise modelling. The updated underwater noise model must be based on final project parameters to be used to install piles in the spawning herring piling restriction area and must include details of any verified mitigation measures to be employed.	13	The MMO welcomes the inclusion of Condition 25.
Schedule 10, Part 2, Condition 13(4) and 13(5)	The Applicant has updated the wording of this condition following consultation with the MMO.	(4) If the underwater noise modelling undertaken for the spawning herring piling restriction plan pursuant to sub-paragraph (1)(j) demonstrates that noise levels associated with piling activity in the spawning herring piling restriction area during the herring spawning season will exceed the levels shown on the outline spawning herring piling restriction plan then no piling activity may be undertaken within the spawning herring piling restriction area during the herring spawning season without the approval of the MMO. (5) In this condition: (a) "herring spawning season" means 1 September and 16 October inclusive; (b) "outline spawning herring piling	13	The MMO welcomes the inclusion of Condition 25.

		<p>restriction plan” means the plan certified as the outline spawning herring piling restriction plan by the Secretary of State for the purposes of the Order under article 41; and (c) “spawning herring piling restriction area” means the area identified as the spawning herring piling restriction area within the outline spawning herring piling restriction plan</p>		
<p>Schedule 10, Part 2, Condition 23</p> <p>Schedule 11, Part 2, Condition 23</p>	<p>The Applicant has updated this condition following comments from Natural England.</p>	<p>(1) The undertaker must submit a close out report to the MMO, MCA, UKHO, the relevant statutory nature conservation body and Trinity House within three months of the date of completion of construction. The close out report must confirm the date of completion of construction and must include the following details— (a) the final number of installed wind turbine generators; (b) the installed wind turbine generator parameters relevant for ornithological collision risk modelling; (c) as built plans; (d) latitude and longitude coordinates of the centre point of the location for each wind turbine generator and the offshore accommodation platform provided as Geographical Information System data referenced to WGS84 datum; and (e) latitude and longitude coordinates of the array cable routes provided as Geographical Information System data referenced to WGS84 datum.; and (f) the location, volume and area of cable protection. (2) Following completion of construction, no further construction activities can be undertaken under this</p>	13	<p>The MMO notes these changes and requests that (3) is updated to three months as with (1) for submitting the close out report. Additionally, the MMO requests that the changes in red be updated to reflect the comments outlined in section 3 of this document, to the following:</p> <p><i>with the exception of the deployment of cable protection outside of marine protected areas. (3) For any subsequent deployments of cable protection following completion of construction outside of marine protected areas, the undertaker must submit an updated close out report not more than fourthree months following deployment of the cable protection.</i></p>

		licence, with the exception of the deployment of cable protection. (3) For any subsequent deployments of cable protection following completion of construction, the undertaker must submit an updated close out report not more than four months following deployment of the cable protection.		
Schedule 10, Part 2, Condition 25	Condition updated to include omitted cross reference.	25.—(1) — No piling activity may be undertaken within the spawning herring piling restriction area during the herring spawning season, unless otherwise approved in writing by the MMO. (2) In this condition: (a) “herring spawning season” means 1 September and 16 October inclusive; (b) “spawning herring piling restriction area” means the area identified as the spawning herring piling restriction area within the spawning herring piling restriction plan; and (c) “spawning herring piling restriction plan” means the plan certified as the spawning herring piling restriction plan by the Secretary of State for the purposes of the Order under article 41 (certification of plans etc.).	13	The MMO notes this change.
Schedule 11, Part 2, Condition 25	The Applicant has updated the wording of this condition following consultation with the Marine Management Organisation.	(1) The undertaker must not carry out any offshore cable installation works or works associated with the installation of the offshore reactive compensation platforms seaward of mean high water springs within the Greater Wash SPA restriction area between 1 November to 31 March inclusive, unless otherwise agreed with approved in	13	The MMO welcomes this change.

		writing by the MMO, in consultation with the statutory nature conservation body.		
<p>Schedules 12 and 13, Part 2, Condition 11(e)</p> <p>Schedules 14 and 15, Part 2, Condition 11(e)</p>	The Applicant has updated the wording of this condition following consultation with the MMO and Natural England.	<p>... (e) In the event that driven or part-driven pile foundations are proposed to be used, a marine mammal mitigation protocol in accordance with the outline marine mammal mitigation protocol (piling), the intention of which is to prevent injury to marine mammals, following current best practice as advised by the relevant statutory nature conservation body, to be submitted to the MMO at least four months prior to commencement of piling activities;. The marine mammal mitigation protocol must include consideration of deployment of noise mitigation systems or noise abatement systems that will be utilised to manage sounds from those piling activities. The marine mammal mitigation protocol must include full details and justification for the mitigation chosen or excluded for deployment;</p>	13	The MMO considers that this should be updated to six months as stated in our closing statement (Section 4.5.2, REP6-134).
Schedules 12 and 13, Part 2, Condition 17	The Applicant has updated this condition following consultation with the Marine Management Organisation	<p>17. No piling of any type is permitted between 1 September and 16 October each year, unless otherwise approved in writing by the MMO.</p>	13	The MMO welcomes this change.

2. Documents submitted in response to the SoS first consultation request.

2.1 The MMO has reviewed the following documents and has no comments to make:

- Eastern Inshore Fisheries and Conservation Authorities (IFCA) (C1-011)
- Natural England (C1-007)
- Department for Environment Food and Rural Affairs (DEFRA) (C1-010)
- Defence Infrastructure Organisation (DIO) (C1-008)
- Ørsted (C1-003)
- National grid (C1-005)

2.2 The following documents have been reviewed and the MMO defers to Natural England in relation to these:

- Nearshore Cable Protection Clarification Note (C1-045)
- Outline Biogenic Reef Mitigation Plan (C1-061)
- Sandbank Compensation Implementation and Monitoring Plan (C1-034)
- Chapter 12 Offshore and intertidal Ornithology
- Chapter 11 Marine Mammals (C1-019)
- Outer Dowsing Noise Abatement Systems Commitment Clarification Note (C1-050)

2.3 The MMO has reviewed the Applicant's response document (C1-051) and has provided relevant comments on documents below. Therefore, we have not provided detailed comments on this document.



3. Scour Protection and Cable Protection Management Plan (C1-063) and Outline Cable Specification and Installation Plan (C1-074)

3.1 The MMO notes Natural England welcomes the following Condition 21 wording:

'No cable protection granted by this licence may be deployed within the IDRBNR SAC after the construction period has ended. Any cable protection to be installed outside of the IDRBNR SAC following completion of construction in locations where cable protection was not installed during construction must be deployed within 10 years of completion of construction, unless otherwise agreed by the MMO in writing.'

3.2 However, this condition is not evident on the latest DMLs. The current wording of condition 21 is as follows:

'Any cable protection to be installed following completion of construction in locations where cable protection was not installed during construction must be deployed within 10 years of completion of construction unless otherwise agreed by the MMO in writing.'

3.3 The MMO considers that maintenance of cable protection outside of marine protected areas can be agreed within the operations and maintenance plan. The marine environment is a highly dynamic environment which can change significantly in relatively short periods of time. As a result, it is inherently difficult to assess the impacts of a windfarm project/activity on the marine environment over very long periods of time. Because of this, the MMO's general position is that it is only appropriate for scour and cable protection which authorises those activities to take place for up to 10 years in areas which are not protected areas in respect of benthic habitats features.

3.4 The MMO's view is that 10 years is an appropriate time period which minimises disruption to developers while allowing the impacts to the environment, human health, navigation and socio-economic concerns to be appropriately taken into account in the consenting process. New cable protection in areas where no cable protection was laid during the initial construction period can occur up to 10 years after construction if this is outside of a marine protected area. Condition 21 must be updated in-line with Natural England's expectations in point 3.1 above, if this is still their position, to make it clear that no cable protection may be deployed within the IDRBNR SAC after the construction period has ended.

3.5 Any new cable protection in areas where no cable protection was installed is subject to a separate marine licence application if it is within a marine protected area. The MMO will expect any application for such further licences to be accompanied by detailed surveys and reports which provide, amongst other things, an accurate description of the habitat that will be effected, details of the location and volumes and nature of the materials which are already in place as well as those to be used.

3.6 The MMO welcomes the addition of the maximum concrete mattress height of 0.35m for the nearshore area (defined as the inner depth of closure out to 7.1 metre water depth) and the reduction in the original maximum design scenario and the submission of the Nearshore Cable Protection Clarification Note (C1-045).



4. Outline Marine Mammal Mitigation Protocol (C1-071) and Outline In-Principle Southern North Sea Special Area of Conservation Site Integrity Plan (C1-057)

- 4.1 The MMO wishes to reiterate that all Marine Mammal Mitigation Protocols and Site Integrity Plans should be submitted **six months** prior to commencement of works, regardless of the scale of activity, to ensure in-combination impacts can be fully assessed.
- 4.2 The MMO notes the Applicant's commitment to use NAS in the following statement '*The Applicant has committed to deploy primary and/or secondary noise reduction methods (Noise Abatement Systems) for pile driving*' which has the removal of '*unless otherwise agreed with the MMO*', leading to a more robust commitment. The MMO welcomes this.

5. Volume 8, Report 8b: Outline MMMP for UXO Clearance (C1-069)

- 5.1 The MMO welcomes the updates to this document and notes that this is related to UXO only, which will be granted by a separate Marine Licence and the MMO has no additional comments at this time.

6. Offshore In Principle Monitoring Plan (C1-072)

- 6.1 The MMO welcomes the updates to this document and defers to Natural England for the updates made in relation to Marine Protected Areas and Ornithology.

Yours sincerely,

[Redacted signature]

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