



To:

GT R4 Limited (Outer Dowsing Offshore Wind Farm)  
Dogger Bank South Offshore Windfarm

Our Ref: EN010130

Date: 24 November 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 several parties (“the first information request”). The deadline for responses was 9 September 2025. On 6 October 2025, the Secretary of State invited all Interested Parties (“IPs”) to comment on the responses received from the first information request. The deadline for responses was 5 November 2025.
3. On 10 October (reissued 21 October) 2025 and 29 October 2025 respectively, the Secretary of State requested information from specific parties (the “second” and “third” information requests). The deadlines for responses were the 24 October for Part A and 7 November for Part B of the second information request. The deadlines for responses for the third information request were the 7 November for the Applicant to respond and the 14 November for the Applicant and InterGen to respond. On 17 November 2025, the Secretary of State invited all IPs to comment on the responses received from the second and third information requests. **The deadline for comments on the responses received from the second and third information requests is 23:59 on 17 December 2025.**
4. The Secretary of State requests the **Applicant** and **Dogger Bank South Offshore Windfarm** to provide updates or information as appropriate in response to the queries set out in this letter. The deadline for responses for this information request is **23:59 on 8 December 2025.**

## **Benthic ecology, intertidal, subtidal and coastal effects**

5. The Secretary of State notes that the Applicant's latest Outline Cable Specification and Installation Plan [C3-017] specifies in Table 5-3 that the indicative maximum design scenario for seabed disturbance from sandwave clearance in Sandbank area 1 of the Inner Dowsing Race Bank and North Ridge ("IDRBNR") Special Area of Conservation ("SAC") is "408,00 m<sup>2</sup>". Based on the cable length and installation parameters presented in Table 5-3, the Secretary of State believes this figure should read "408,000m<sup>2</sup>". The **Applicant** is invited to confirm whether 408,00m<sup>2</sup> is the correct maximum design scenario for Sandbank Area 1 to be conditioned through the Deemed Marine Licence. If not, it is requested to submit an updated version of the Outline Cable Specification and Installation Plan, specifically with the correct maximum design scenario listed in Table 5-3.
6. If the **Applicant** submits an updated Outline Cable Specification and Installation Plan, it must specify the worst-case scenario impact by footprint (square metres) for boulder clearance and cable burial activities through areas of supporting habitat for Annex 1 *Sabellaria spinulosa* reef within the IDRBNR SAC.

## **Offshore In-Principle Monitoring Plan ("OIPMP") – Benthic Ecology and Marine Physical Processes**

7. In line with paragraphs 2.8.83-87 of NPS EN-3, to validate the predictions made within the Environmental Statement and detect negative effects significantly beyond those predictions, as well as to address key knowledge gaps in modelling and the baseline environment, the **Applicant** is requested to update the OIPMP [C1-076] as presented in paragraphs 7-21.
8. The **Applicant** is requested to revise all 'Hypotheses' sections of the OIPMP [C1-076] to require that the thresholds of significance/change relevant to hypotheses will be discussed and agreed with Natural England ("NE") and the Marine Management Organisation ("MMO").
9. The **Applicant** is requested to revise all relevant sections of the OIPMP [C1-076] to require that the thresholds/triggers for adaptive management will be discussed and agreed with NE and the MMO.
10. Noting NE's advice on monitoring for physical processes and benthic habitats in Annex 2 of its response to the second information request [C3-029], the Applicant is requested to make the following insertions to Table 3-1, Column 5 (Monitoring proposal) of the OIPMP [C1-076] (presented below in italics):
  - a) Pre-construction, first bullet point: the presence and characteristics of sandwaves *and sandbanks* within the area(s) within the Order Limits in which it is proposed to carry out construction works.
  - b) Post-construction, first bullet point: establish the change to/recovery of a representative sample (*to be agreed with NE and the MMO*) of bedforms following sandwaves clearance and cable installation activity.

- c) Post-construction, first bullet point: Further surveys will be required at a frequency to be agreed with the MMO (e.g. 3 years non-consecutive i.e. 1, 3 and 6 years or 1, 5 and 10 years) if data from the first post-construction survey does not indicate full recovery (*in line with a definition to be agreed with NE and the MMO*) of bedforms following sandwave clearance and cable installation;
  - d) Post-construction, third bullet point: establish the change to/recovery of the nearshore bedload transport regime and nearshore seabed morphology (*against thresholds to be agreed with NE and the MMO*) following the installation of concrete mattresses in the nearshore area (if required).
11. Again noting NE's advice on monitoring for physical processes and benthic habitats in Annex 2 of its response to the second information request [C3-029], the **Applicant** is invited to consider whether surveys may need to extend beyond the Order Limits to assess changes in bedform topography resulting from the Proposed Development; the **Applicant** is requested to explain their conclusions and make provision for this within the OIPMP [C1-076] as appropriate.
12. The Secretary of State notes that the Applicant relies on mitigation measures (micro-siting of cable route and a 50m buffer zone) to avoid impacts to habitats of principal importance or Annex 1 *S. spinulosa* reef, including to rule out an Adverse Effect on Integrity ("AEOI") to the IDRBNR SAC due to potential habitat loss, temporary disturbance and smothering/siltation rate changes from seabed preparation and cable installation activities. To validate these conclusions, the **Applicant** is requested to revise Table 3.2 of the OIPMP [C1-076] to require that:
- a. in the event that pre-construction surveys indicate the presence of habitats of principle importance/Annex 1 reef, then post-construction surveys of these identified habitats will be undertaken within 1 year of the cessation of construction activities;
  - b. in the event that pre-construction surveys indicate the presence of Annex 1 reef within the IDRBNR SAC, then post-construction surveys of those habitats within the IDRBNR SAC, will be completed within 1 year of the cessation of cable installation in the IDRBNR SAC.

If the **Applicant** cannot undertake these commitments, it is requested to provide evidenced, project-specific reasoning as to why and present an alternative approach and timeframe which it can commit to and that will allow the Applicant to effectively test hypothesis 1 (Section 3.3.3 of the OIPMP) across the works area and specifically within the IDRBNR SAC.

13. The Secretary of State also notes that the Applicant relies on the recoverability of supporting habitat for Annex 1 *S. spinulosa* reef to rule out AEOI of the IDRBNR SAC due to temporary disturbance from seabed preparation and cable burial activities. He further notes that the relevant post-construction monitoring proposal in Table 3.2 of the OIPMP [C1-076] (Column 5 (Monitoring Proposal); Effects on supporting habitat for Annex 1 *S. spinulosa* reef) appears limited to grab sampling;

and that NE advised that this is not fit for purpose [C3-029]. The **Applicant** is requested to revise Table 3.2 of the OIPMP to include additional potential survey methods that would be appropriate to determine any changes in the extent and quality, and the recovery of supporting habitat for Annex I *S. spinulosa* reef. When revising Table 3.2, the Applicant should consider the suitability of drop down video and other methods to be employed for identifying effects on habitats of principle importance or Annex 1 habitat, alongside including survey methods relevant to the optional parameters set out in NE Appendix C2 submitted at Deadline 3 [REP3-067]. If it is not possible or feasible to determine at this stage, the **Applicant** is requested to explain why, and to revise Table 3.2 of the OIPMP to secure that specific survey methods will be developed in consultation with NE and the MMO post-consent.

14. The **Applicant** is requested to clarify whether survey proposals to monitor "Effects on Annex 1 Sandbank communities" outlined in Table 3.2 of the OIPMP [C1-076], and in particular post-construction monitoring, will be limited to pre-construction grab sampling or whether the Applicant will also consider other survey methods such as those presented earlier in the table for "effects on habitats of principle importance or Annex 1 habitat". The **Applicant** is requested to revise Table 3.2 of the OIPMP [C1-076] accordingly.
15. Noting that proposals for monitoring the introduction and spread of marine Invasive Non-Native Species ("INNS") only include post-construction measures, the **Applicant** is requested to clarify what baseline this post-construction monitoring will be considered against and include a commitment to specific pre-construction monitoring should it be required to establish one. The **Applicant** is requested to provide an explanation of their conclusions and revise Table 3.2 of the OIPMP [C1-076] accordingly.

#### **Offshore In-Principle Monitoring Plan – Offshore Ornithology**

16. The **Applicant** is requested to revise Section 3.6 of the OIPMP [C1-076] to require appropriate ornithological monitoring to validate the predictions made within the Environmental Statement and detect effects significantly beyond those predictions, as well as to help address key knowledge gaps and areas of uncertainty in the assessment of potential impacts to offshore ornithology receptors. Noting NE advice on the OIPMP – Ornithology in Annex 3 of its response to the second information request [C3-029], and during Examination [REP6-156], this should include, but not necessarily be limited to, a commitment to undertake monitoring which will address at least one of the following areas of uncertainty highlighted in [REP6-156]:
  - Connectivity of the array area to Flamborough and Filey Coast Special Protection Area.
  - The importance of the array area for auks at the beginning of the breeding season and post-breeding chick-rearing/moult period.
  - Colony-based studies.

- Other areas of uncertainty associated with displacement and collision, in line with NE's best practice guidance.

17. If it is not possible to commit to monitoring for specific areas of uncertainty at this time, the **Applicant** is requested to explain why and revise Section 3.6 of the OIPMP [C1-076] to include the list of potential monitoring included in paragraph 15 with a commitment to undertake monitoring in at least one of these focal areas, which would be determined in a detailed design stage if consent is granted.
18. The Secretary of State notes the Applicant's intention to coordinate with sector initiatives, as well as advice from NE in Annex 3 of its response to Part B of the second information request [C3-029] that monitoring undertaken strategically and/or collaboratively between projects and industry partners is likely to be of greater value than individual project-led monitoring, alongside paragraph 2.8.87 of NPS EN-3. He also notes NE advice in [C3-029] that there is currently no mechanism in place for this to be delivered, and its recommendation for the Applicant to consider working with Dogger Bank South Offshore Wind Farm to collaboratively deliver post-consent ornithology monitoring. The **Applicant** is therefore requested to explore options to work collaboratively with Dogger Bank South Offshore Windfarm and revise Section 3.6 of [C1-076] as appropriate.
19. **Dogger Bank South Offshore Windfarm** is invited to comment on the potential for a collaborative approach to post-consent ornithology monitoring and provide an update on the outcome of any discussion related to the Secretary of State's request to the Applicant in paragraph 20.

#### **Offshore In-Principle Monitoring Plan – Other**

20. The Secretary of State has reviewed Table 3.3, Column 5 (Monitoring proposal); ("Auditory injury to marine mammals from underwater noise during pile driving"), third bullet point. He queries whether this information is presented in the correct part of the table, as it appears to support the headline reason for monitoring of the subsequent row. The **Applicant** is requested to amend the table as appropriate.
21. The Secretary of State notes there is no content in Table 3.3, Column 6 (Details); ("Auditory injury to marine mammals from underwater noise"). The **Applicant** is requested to revise Table 3.3 to ensure it is complete.
22. The **Applicant** is requested to update their OIPMP [C1-076] to include a commitment to operational migratory bat monitoring, in-line with the commitments made by the Five Estuaries Offshore Windfarm in [C4-007].

#### **Compulsory Acquisition and Temporary Possession (CA and TP) - Document Updates**

23. The Secretary of State has noted the Applicant's response to the second information request. In relation to the information supplied by the Applicant across the different CA and TP documents to date, the Secretary of State notes that the

ExA made a Procedural Decision [PD-009] to request that the Applicant completes and maintains a Compulsory Acquisition and Land Rights Tracker (“CA and LRT”). The aim was to make the process of the Applicant’s reporting of ongoing discussions with affected persons and others much easier, and the reporting of such matters to the Secretary of State more efficient. The Secretary of State has cross-referenced the most recent CA and LRT [REP6-081] (submitted at end of Examination) with the most recent Book of Reference (“BoR”) (submitted on 10 July 2025) and found multiple inconsistencies between the documents. Please see below for examples:

- A new plot has been added to the BoR (plot 33-038a), Betty Skipworth (existing landowner of other plots) has been included as the owner. This additional plot has not been reflected in the CA and LRT as an additional plot for landowner Betty Skipworth.
- Ownership for plot 02-006 has been amended to include Lindsey Marsh Drainage Board in respect of riparian rights in the BoR. This has not been reflected in the CA and LRT under Lindsey Marsh Drainage Board’s plots in which it has Permanent Rights attached. This is inconsistent with the BoR and with the approach that has been applied to other plots with interests added that have been updated in the CA and LRT (regardless of land interest type, e.g., owners, occupiers, tenants or Category 2 interests). For example, addition of plot 37-002 for Peter Thorold Ltd is reflected in the CA and LRT.
- Inconsistent application of changes to CA and LRT - newly impacted landowners have been added with plots and status of negotiations to the CA and LRT, however updates to interests and plots of existing landowners have not been applied.

24. The Secretary of State therefore requests the **Applicant** to provide a clear and comprehensive justification for the inconsistencies between the CA and LRT, and the BoR, and to provide an updated version of the CA and LRT which incorporates all of the changes to the most recent BoR including updates to plots, owners, occupiers, tenants and Category 2 interests.

25. **Responses to the requested information should be submitted by email only to [OuterDowsingOffshoreWind@planninginspectorate.gov.uk](mailto:OuterDowsingOffshoreWind@planninginspectorate.gov.uk) by 23.59 on 8 December 2025.**

26. 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 **8 December 2025**.

27. 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 & Innovation

Department of Energy Security & Net Zero