

# Outer Dowsing Offshore Wind

## The Applicant's Response to the Fourth Request for Information

### Response to the Fourth Request for Information

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## Acronyms & Definitions

### Abbreviations / Acronyms

Abbreviation / Acronym	Description
<b>AEoI</b>	Adverse Effects on Integrity
<b>ANS</b>	Artificial Nesting Structure
<b>CA</b>	Compulsory Acquisition
<b>DCO</b>	Development Consent Order
<b>DDV</b>	Drop Down Video
<b>ECC</b>	Export Cable Corridor
<b>ExA</b>	Examining Authority
<b>ES</b>	Environmental Statement
<b>IDRBNR</b>	Inner Dowsing, Race Bank and North Ridge
<b>INNS</b>	Invasive Non-Native Species
<b>LRT</b>	Land Rights Tracker
<b>MMO</b>	Marine Management Organisation
<b>NE</b>	Natural England
<b>NPS</b>	National Policy Statement
<b>OIPMP</b>	Offshore In-Principle Monitoring Plan
<b>RFI</b>	Request for Information
<b>SAC</b>	Special Area of Conservation
<b>TP</b>	Temporary Possession
<b>WCS</b>	Worst Case Scenario

## Reference Documentation

Outer Dowsing Document Number	Planning Inspectorate Document Reference	Title
8.3	C1-076	Offshore In-Principle Monitoring Plan
8.5	C3-016	Cable Specification and Installation Plan
6.1.7	REP4a-029	Chapter 7: Marine Physical Processes
20.15	REP3-047	Sandwave Levelling Study
n/a	REP3-067	Appendix C2 Natural England's Potential Evidence Based Approach to Defining Supporting Habitats for Sabellaria spinulosa Reef v1.0

## **1 Applicant's Responses to the Second Request for Information**

1. The Secretary of State for Energy Security and Net Zero issued a fourth Request for Information ("**RFI**") to GT R4 Limited (trading as Outer Dowsing Offshore Wind) (the Applicant) and other Interested Parties on the 24 November 2025.
2. In section 1.1 below the Applicant has provided its written response, or signposting to its written response, against each request asked of it in the fourth RFI.

## 1.1 Applicant's Responses to the Fourth Request for Information

3. The Applicant has provided a response to each relevant paragraph within the Fourth Request for Information in [Table 1-1](#) below.

Table 1-1 The Applicant's Responses to the Fourth Request for Information dated 24 November 2025

Paragraph Number	Addressed to	Request	Applicant Response
<b>Benthic ecology, intertidal, subtidal and coastal effects</b>			
5	The Applicant	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 m2 ". Based on the cable length and installation parameters presented in Table 5-3, the Secretary of State believes this figure should read "408,000m2". The Applicant is invited to confirm whether 408,00m2 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.	The Applicant confirms that this is a typographical error, and the correct figure should read 408,000 m <sup>2</sup> . The Applicant had updated the Outline Cable Specification and Installation Plan (Document Reference 8.5, V10 submitted in response to the SoS letter dated 24 <sup>th</sup> November 2025) accordingly.
6	The Applicant	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 <i>Sabellaria spinulosa</i> reef within the IDRBNR SAC.	<p>The Secretary of State should regard the information presented in Table 5.3, Indicative Maximum Design Parameters for Cable Installation within the SAC, as set out in the <i>Outline Cable Specification and Installation Plan (Document Reference 8.5)</i>, to represent the worst-case scenario across supporting habitat for Annex 1 <i>Sabellaria spinulosa</i> reef within the IDRBNR SAC for boulder clearance. Providing a more detailed breakdown of this information within the SAC may not reliably reflect the worst-case scenario because the full details of the number and location of boulders to be removed and relocated and the method of clearing boulders will not be known until pre construction surveys have been carried out and specific approaches and footprints of sandwave clearance have been confirmed; therefore, maintaining contingency is recommended. It is theoretically possible that all of the boulders requiring clearance that are allowed for in the worst-case scenario are located on areas of supporting habitat for Annex 1 <i>Sabellaria spinulosa</i> reef within the IDRBNR SAC. A paragraph has been added below Table 5.3 to ensure this rationale is clear in the plan.</p> <p>In relation to cable burial activities, a paragraph has also been added below Table 5.3, which details the worst-case scenario impact by footprint (square metres) for cable burial activities through areas of supporting habitat.</p> <p>The paragraph added to the updated <i>Outline Cable Specification and Installation Plan (Document Reference 8.5)</i> states the following:</p> <p>The Secretary of State requested within the Request for Information dated 24<sup>th</sup> November that the Applicant provide information on the worst-case scenario impact by footprint (square metres) for boulder clearance and cable burial activities through areas of supporting habitat for Annex 1 <i>Sabellaria spinulosa</i> reef within the IDRBNR SAC.</p> <ul style="list-style-type: none"> <li>▪ Boulder clearance within supporting habitat for <i>Sabellaria spinulosa</i>: The worst-case scenario should be the same as that presented for the entire SAC (outside of sandbanks), which is 853,344 m<sup>2</sup>, as providing a more detailed breakdown of this information within the SAC may not reliably reflect the worst-case</li> </ul>

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			<p>scenario where boulders will be cleared because the full details of the number and location of boulders to be removed and relocated and the method of clearing boulders will not be known until pre construction surveys have been carried out and specific approaches and footprints of sandwave clearance have been confirmed; therefore, maintaining contingency is recommended. [It is theoretically possible that all of the boulders requiring clearance that are allowed for in the worst-case scenario are located on areas of supporting habitat for Annex 1 <i>Sabellaria spinulosa</i> reef within the IDRBNR SAC.]</p> <ul style="list-style-type: none"> <li>▪ Cable burial activities within supporting habitat for <i>Sabellaria spinulosa</i>: The value of the length of transit for one cable through supporting habitat is 16,562.5 m, as identified in Table 5-1. If this is multiplied by the cable installation width (18 m) as detailed in Table 5-3, the total footprint is 298,125 m<sup>2</sup>. For all four cables, the total area is 1.19 km<sup>2</sup>.</li> </ul>
<b>Offshore In-Principle Monitoring Plan ("OIPMP") – Benthic Ecology and Marine Physical Processes</b>			
7	The Applicant	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.	Please see the Applicant's responses to paragraphs 8–21 below. The updates noted below have been reflected in the updated OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24 <sup>th</sup> November 2025).
8	The Applicant	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").	<p>The Applicant notes within Section 1.4 of the OIPMP that <i>"Consultation with statutory consultees, including Natural England and the MMO, is fundamental to agreeing that the monitoring adopted for the Project is proportionate, effective, and secured. As previously described, this document is intended to form a framework for engagement on the proposed monitoring. Details of relevant consultation will be provided within the individual monitoring plans to be developed post-consent."</i> Therefore, the Secretary of State can be assured that the monitoring plan will be developed in collaboration with the MMO and their advisors, including Natural England.</p> <p>However, to address requests in point 8 and 9 from the Secretary of State, the Applicant has updated all relevant 'Hypotheses' sections of the OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025) to state that <i>"Details of relevant consultation will be provided within the individual monitoring plans to be developed post-consent. The thresholds of significance/change relevant to hypotheses and the thresholds/triggers for adaptive management will be discussed and agreed with the MMO and following consultation with their advisors which will include Natural England."</i></p> <p>The wording above reflects the approach set out in conditions 13(1)(c), 17, 18 and 19, Part 2, Schedules 10 and 11 of the DCO, whereby responsibility for making a determination on the acceptability of the monitoring plan rests with the MMO, following consultation with Natural England. This is consistent with the MMO's role as the marine licensing regulator and reflects the standard approach taken to discharge of marine licence conditions in DCOs.</p>
9	The Applicant	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.	<p>Please see the response 8 for details of the consultation undertaken for the OIPMP. Therefore, the Secretary of State can be assured that the monitoring plan will be developed in collaboration with the MMO and Natural England.</p> <p>However, the Applicant has updated all relevant sections of the OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025). to state that <i>"Details of relevant consultation will be provided within the individual monitoring plans to be developed post-consent. The thresholds of significance/change relevant to hypotheses and the thresholds/triggers for adaptive management will be</i></p>



Paragraph Number	Addressed to	Request	Applicant Response
			<p><i>discussed and agreed with the MMO and following consultation with their advisors which will include Natural England."</i></p> <p>The wording above reflects the approach set out in conditions 13(1)(c), 17, 18 and 19, Part 2, Schedules 10 and 11 of the DCO, whereby responsibility for making a determination on the acceptability of the monitoring plan rests with the MMO, following consultation with Natural England. This is consistent with the MMO's role as the marine licensing regulator and reflects the standard approach taken to discharge of marine licence conditions in DCOs.</p>
10	The Applicant	<p>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):</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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;</li> <li>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).</li> </ul>	<p>The Applicant has revised Table 3-1, Column 5 (Monitoring proposal) of the OIPMP as requested by the SoS as follows:</p> <ul style="list-style-type: none"> <li>a) Pre-construction, first bullet point: the presence and characteristics of sandwaves <i>and sandbanks</i> within the area(s) within the Order Limits in which it is proposed to carry out construction works.</li> <li>b) Post-construction, first bullet point: establish the change to/recovery of a representative sample (<i>to be agreed with Natural England and the MMO</i>) of bedforms following sandwaves clearance and cable installation activity.</li> <li>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 (<i>in line with a definition to be agreed with Natural England and the MMO</i>) of bedforms following sandwave clearance and cable installation.</li> <li>d) Post-construction, third bullet point: establish the change to/recovery of the nearshore bedload transport regime and nearshore seabed morphology (<i>against thresholds to be agreed with Natural England and the MMO</i>) following the installation of concrete mattresses in the nearshore area (if required).</li> </ul>
11	The Applicant	<p>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.</p>	<p>The evidence provided by the Applicant throughout the Environmental Statement (ES) and Examination stages does not suggest that potential effects of installation on bedforms will extend beyond the Order Limits, nor has any evidence to that effect been provided by Natural England, therefore the Applicant do not consider consideration of such to be necessary.</p> <p>The Applicant committed to the monitoring of seabed and bedform recovery in response to comments provided by Natural England in Natural England's Comments on the Offshore In Principle Monitoring Plan (REP3-075). These comments recommended that evidence was needed to validate predictions of impacts to, and recovery of, bedform morphology following seabed preparation and sandwave clearance. The potential impacts to seabed morphology from seabed preparation activities have been assessed in Section 7.12.1.2 Impact 2 of Chapter 7: Marine Physical Processes (REP4a-029). Local perturbations to existing sandwaves that do not change the fundamental conditions of the setting (i.e. the tidal and wave regime and the volume of mobile sediment</p>

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			present) will not prevent continued evolution of the features through the same naturally occurring processes and the features will therefore recover towards a new equilibrium state over time. This is supported by evidence provided within the Sandwave Levelling Study (REP3-047), which demonstrates that the Project area is characterised by a dynamic sediment environment that is conducive to the development and maintenance of mobile bedforms. Given that all seabed preparation activities will take place within the Order Limits, and no evidence of potential indirect effects has been identified, monitoring in order to validate predictions outside the Order Limits is not proportionate or necessary. As is well-established in law and policy and as referred to in EN-1 (DESNZ, 2023, paragraph 4.1.16) the Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. PINS Advice Note 15 (the Planning Inspectorate, 2018, paragraphs 15.2, and 29.2), makes clear that such principles should apply to deemed marine licence conditions (and by extension in our submission relevant control documents).
12	The Applicant	<p>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 <i>S. spinulosa</i> 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:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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.</li> </ul> <p>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.</p>	<p>The Applicant has revised Table 3.2 of the OIPMP in line within the Secretary of State requests in relation to the timing of post-construction surveys for the presence of habitats of principle importance/Annex 1 reef within and outside the SAC. The required updates have been made to Table 3.2 of the OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025).</p>
13	The Applicant	<p>The Secretary of State also notes that the Applicant relies on the recoverability of supporting habitat for Annex 1 <i>S. spinulosa</i> 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 <i>S. spinulosa</i> reef) appears limited to grab sampling; 4 and that NE advised that this is not fit</p>	<p>The Applicant has updated Table 3.2 of the OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025) to include additional monitoring and analyses (faunal analysis of grab samples) with the aim of understanding of changes in the extent and quality of, as well as the recovery of, supporting habitat for Annex I <i>S. spinulosa</i> reef.</p> <p>To ensure transparency in the inclusion of survey methods relevant to the optional parameters outlined in Natural England’s Appendix C2 (submitted at Deadline 3 [REP3-067]), the Applicant has reviewed each parameter used to define supporting habitat for Annex I <i>S. spinulosa</i> reef (see below). The Applicant has</p>

Paragraph Number	Addressed to	Request	Applicant Response
		<p>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 <i>S. spinulosa</i> 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.</p>	<p>summarised the proposed monitoring approach, indicating where monitoring is currently being undertaken, where additional monitoring and/or analysis is being provided in response to this request, and where further monitoring is not considered necessary.</p> <p><b>Essential Parameter 1:</b>  <i>Location is subject to moderate to strong tidal flows/wave action.</i>  This parameter threshold is met across the entire Offshore Export Cable Corridor (ECC). Moderate to strong tidal flows and wave action are present throughout the site (ABPmer, 2025). Therefore, no pre-construction monitoring is required.</p> <p><b>Essential Parameter 2:</b>  <i>Sediment character meets one or more of the descriptions within Table 1 Appendix C2.</i>  A detailed pre- and post- construction grab sampling campaign, with samples undergoing particle size analysis to confirm sediment character will be undertaken. This is a current commitment of the Applicant as detailed within Table 3.2 of the updated OIPMP.</p> <p><b>Optional Parameter 1:</b>  <i>Location is within an area of sand waves/sandbanks OR within 2 km of sandbanks in any direction OR within 3 km in direction of tidal stream.</i>  This parameter will be addressed during the pre-construction phase, when detailed geophysical data will be collected across the site, as outlined within Table 3.1 and 3.2 of the updated OIPMP.</p> <p><b>Optional Parameter 2:</b>  <i>Location is within an area where <i>S. spinulosa</i> reef may currently be absent, but where reef OR the SS.SBR.PoR.SspiMx biotope has been previously identified.</i>  Historic data on the SS.SBR.PoR.SspiMx biotope and absence of Annex I <i>S. spinulosa</i> reef have been previously presented (ENVISION, 2024b). No additional pre-construction monitoring is required for this parameter as the existing survey data will provide this information.</p> <p><b>Optional Parameter 3:</b>  <i>Individual <i>S. spinulosa</i> count is &gt;375 per 0.1m<sup>2</sup> within a given sediment type polygon.</i>  If <i>S. spinulosa</i> reef is identified during grab sampling campaigns, individual <i>S. spinulosa</i> will be counted within the benthic laboratory. The detail of this analysis has been added to the updated OIPMP, see amendments to Table 3.2. The Project will target predicted reef areas as identified within the geophysical survey campaign using Drop-Down Video (DDV), so as not to impact key features.</p> <p><b>Optional Parameter 4:</b>  <i>Location is within an area/polygon mapped as the SS.SBR.PoR.SspiMx biotope.</i>  A pre-construction and post-construction survey campaign will be undertaken across the Offshore ECC section within the IDRBNR SAC. This will include grab sampling for particle size and faunal analysis will also be undertaken as per Natural England request to confirm the SS.SBR.PoR.SspiMx biotope. The addition of faunal analysis across the grab sample locations has been added to the updated OIPMP, see amendments to Table 3.2.</p> <p><b>Optional Parameter 5:</b>  <i>Elevation of dead or living tubes ≥ 5 cm (average) but reef not defined due to low cover/patchiness.</i></p>

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			<p>Elevation analysis will be undertaken using DDV data collected during ground-truthing in areas where reef presence is predicted or previously recorded, in line with industry good practice. This commitment is reflected in the updated OIPMP (see amendments to Table 3.2), ensuring that the Project adheres to good practice for the analysis of <i>S. spinulosa</i> reef.</p> <p><b>Optional Parameter 6:</b>  <i>Extent of encrusting S. spinulosa tubes &gt;10,000 m<sup>2</sup> but elevation insufficient to classify as Annex I reef.</i>  Extent analysis will be undertaken using DDV data collected during ground-truthing in predicted or historically recorded reef areas, following industry best practice. This commitment is reflected in the updated OIPMP (see amendments to Table 3.2), ensuring that the Project adheres to best practice for the analysis of <i>S. spinulosa</i> reef.</p> <p>As is well-established in law and policy and as referred to in EN-1 (DESNZ, 2023, paragraph 4.1.16) the Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. PINS Advice Note 15 (the Planning Inspectorate, 2018, paragraphs 15.2, and 29.2), makes clear that such principles should apply to deemed marine licence conditions (and by extension in our submission relevant control documents). The Applicant therefore considers that the proposed approach meets these tests and is proportionate.</p>
14	The Applicant	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.	The Applicant confirms that there is no additional survey requirements are necessary beyond those outlined in Table 3.2 of the OIPMP (Document Reference 8.3). Grab sampling is widely recognised as the primary and most effective method for characterising faunal communities within Annex I habitat "Sandbanks which are slightly covered by sea water all the time" on the UK continental shelf. This technique provides direct, quantitative data on infaunal assemblages, which is critical for robust habitat assessment. Grab samples reliably capture the key infaunal communities associated with sandbanks, including polychaetes (e.g., <i>Nephtys</i> spp., <i>Spiophanes bombyx</i> ), bivalves ( <i>Abra alba</i> , <i>Tellina</i> spp.), and amphipods. The resulting dataset would enable comprehensive analysis of species composition, abundance, and diversity, ensuring that habitat characterisation requirements are met. As is well-established in law and policy and as referred to in EN-1 (DESNZ, 2023, paragraph 4.1.16) the Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. PINS Advice Note 15 (the Planning Inspectorate, 2018, paragraphs 15.2, and 29.2), makes clear that such principles should apply to deemed marine licence conditions (and by extension in our submission relevant control documents). The Applicant therefore considers that the monitoring already proposed meets these tests and is proportionate.
15	The Applicant	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.	The Applicant confirms that baseline data for the site is already available from surveys undertaken to inform the Environmental Impact Assessment (EIA). This includes comprehensive faunal analyses, which as standard reviewed the presence of marine Invasive Non-Native Species (INNS). All grab and DDV analysis undertaken as part of the pre-construction monitoring will include INNS screening and identification and this has been included within Table 3.2. Consequently, there will be a robust understanding of the presence or absence of INNS at the site, supported by pre-construction data and EIA-derived baseline characterisation information. This will enable post-construction monitoring to be considered against an established and well-documented baseline.
<b>Offshore In-Principle Monitoring Plan – Offshore Ornithology</b>			
16	The Applicant	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	The Applicant can commit in principle to delivering monitoring that targets evidence gaps such as those outlined in paragraph 16 of the SoS fourth Request for Information:



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		<p>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]:</p> <ul style="list-style-type: none"> <li>Connectivity of the array area to Flamborough and Filey Coast Special Protection Area.</li> <li>The importance of the array area for auks at the beginning of the breeding season and post-breeding chick-rearing/moult period.</li> <li>Colony-based studies.</li> <li>Other areas of uncertainty associated with displacement and collision, in line with NE’s best practice guidance.</li> </ul>	<ul style="list-style-type: none"> <li>Connectivity of the array area to Flamborough and Filey Coast Special Protection Area.</li> <li>The importance of the array area for auks at the beginning of the breeding season and post-breeding chick-rearing/moult period.</li> <li>Colony-based studies.</li> <li>Other areas of uncertainty associated with displacement and collision, in line with NE’s best practice guidance.</li> </ul> <p>The Applicant will commit to undertaking monitoring to address at least one of the focal areas listed in paragraph 16 (should these options be deemed appropriate) after post-consent consultation with Natural England (and any other relevant stakeholders). The Applicant considers that any monitoring program would benefit from the guidance of relevant stakeholders to ensure that the focus of the monitoring, and the monitoring and analysis methods, are fit for purpose and aligned with any other similar monitoring that may be ongoing by other projects or initiatives.</p> <p>This approach also reduces the scope for any duplication of effort with other monitoring programs.</p> <p>In order for the monitoring activity to be targeted most appropriately, it is not prudent to commit to monitoring for specific areas of uncertainty at this time. For example, during the post consent stage design envelope parameters that are relevant to offshore ornithology will continue to be refined. For example, turbine parameters such as height, rotor size, positions, numbers and layouts will continue to be refined as will associated construction and operation activities. Furthermore, there may be novel research gaps that are identified in the future that the project could implement or contribute to.</p> <p>In addition, the Applicant notes the SoS request to explore options to deliver monitoring collaboratively with Dogger Bank South Offshore Windfarm. As such, the Applicant can commit to any specific monitoring approach once such options have been explored. Given that Dogger Bank South Offshore Windfarms are currently awaiting consent and are likely to undergo similar post-consent consultation with Natural England regarding monitoring, agreement, and therefore commitment to a joint monitoring approach cannot be defined until both the Applicant and Dogger Bank South Offshore Windfarms post-consent consultation with Natural England and the MMO is underway. Nonetheless, as stated in paragraph 18 below the Applicant and Dogger Bank South Offshore Windfarm have produced the following joint statement: <i>‘An MoU is in place between the Applicant and Dogger Bank South in order to facilitate collaboration between the parties. At the appropriate post-consent stage, the Applicant and Dogger Bank South will explore options to work collaboratively to deliver post-consent ornithology monitoring’</i></p> <p>The list of options is presented within the updated OIPMP (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025). These options will be refined in consultation with Natural England and the final details of implementation will be determined in a detailed design stage post consent. The Applicant also notes that where practicable and appropriate the Applicant and Dogger Bank South will explore the potential to collaborate to deliver monitoring. This will be explored further during the post –consent phase.</p>
17	The Applicant	<p>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.</p>	
18	The Applicant	<p>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</p>	<p>Commitment to explore these options with Dogger Bank South Offshore Windfarms has been written into Section 3.6 of the Offshore In Principle Monitoring Plan (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24<sup>th</sup> November 2025) in the following joint statement: <i>‘An MoU is in place between the Applicant and Dogger Bank South in order to facilitate collaboration between the parties. At the appropriate post-consent stage, the Applicant and Dogger Bank South will explore options to work collaboratively to deliver post-consent ornithology monitoring’</i></p>

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		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	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.	
<b>Offshore In-Principle Monitoring Plan – Other</b>			
20	The Applicant	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.	The Applicant has amended Table 3.3 within the updated Offshore In Principle Monitoring Plan (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24 <sup>th</sup> November 2025.)
21	The Applicant	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.	The Applicant has amended Table 3.3 within the updated Offshore In Principle Monitoring Plan (Document Reference 8.3, V5 submitted in response to the SoS letter dated 24 <sup>th</sup> November 2025).
22	The Applicant	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].	<p>The Applicant notes that to date there has not been any comments from stakeholders regarding impacts on migratory bats. Although bat movements have been documented across the southern North Sea between the UK, The Netherlands and Belgium, and over the Baltic Sea between Denmark, Germany and Sweden, there is a lack of evidence to suggest significant migration within the Project area itself. Data from the Motus tracking network indicates that Nathusius' pipistrelles (<i>Pipistrellus nathusii</i>) mainly migrate through the southeast of the UK, well to the south of the Project site. This is supported by Lagerveld <i>et al.</i>, (2023), which observed spatial differences along the Noord Holland coast with higher densities of bats within monitoring locations across the central Coast. An explanation for this could be that bats prefer to migrate over land and avoid major ecological barriers such as large bodies of water, so will migrate in locations with shortest distances which is the closest distance to the UK coast Ahlén <i>et al.</i>, (2009). This therefore suggests that migratory bats are unlikely to be in significant numbers within the Project area.</p> <p>However, the Applicant has updated the OIPMP (Document Reference 8.3, V5 submitted in response to the Secretary of State letter dated 24<sup>th</sup> November 2025) to include an option for monitoring should it be required, and will engage with Natural England post consent to discuss and, if deemed necessary, propose proportionate monitoring for approval by the MMO.</p>
<b>Compulsory Acquisition and Temporary Possession (CA and TP) – Document Updates</b>			
23	The Applicant	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	The Applicant has undertaken a full review of the CA and LRT and BoR to ensure they are consistent. The Applicant has identified some minor discrepancies between the two documents and has therefore provided a revised version of the BoR (document 4.1, version 10) and the CA and LRT (document 15.4, version 7). These updates do not impact the consultation or negotiations undertaken by the Applicant. It should be noted that

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		<p>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:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	<p>the updates made are to fix inconsistencies between the BoR and CA and LRT as submitted at Deadline 6 (or in the case of the BoR, submitted on 10 July which was the Deadline 6 version) and do not represent any updates to the factual position on interests and negotiations as at the close of examination.</p> <p>The Applicant wishes to highlight that there are some nuances in how negotiations are reported in the CA and LRT which may give the impression that the BoR and the CA and LRT remain inconsistent, but they are not. These nuances are listed below to explain any perceived outstanding inconsistencies:</p> <ul style="list-style-type: none"> <li>▪ Assumed owner – persons noted in the BoR as assumed owners in respect of a plot are not included within the CA and LRT on the basis that until such time as ownership is confirmed, the Applicant is not negotiating with those parties in respect of those plots. As such, where a plot is unregistered and ownership is assumed, that plot is not included on the CA and LRT. There is an exception to this general rule; when a landowner has stated that they are able to evidence ownership of unregistered land they are included in the CA and LRT, however until such time they have deduced title as evidence, they remain ‘as assumed owner’ in the BoR.</li> <li>▪ Tenants/Occupiers – Tenants/Occupiers who occupy land under a Farm Business Tenancy of 2 years or less or under a licence agreement are not a party to any voluntary agreement being sought and as such are not included as a party with whom the Applicant is negotiating within the CA and LRT. It may also be the case that the landowner has reserved rights to grant easements and therefore the tenant is not required to be party to the agreement so would not be included within the CA and LRT.</li> <li>▪ Category 2 interests – persons noted in the BoR as having private rights in respect of a plot or as being a mortgagee of a plot are not included within the CA and LRT as the Applicant is not seeking a voluntary agreement with these parties. Should a consent be required on a case-by-case basis this is dealt with as part of the voluntary agreement sought with the landowner as is normal for property transactions. Category 2 interests who are statutory undertakers are included on the CA and LRT with a corresponding update on relevant protective provisions.</li> <li>▪ Duplication within the CA and LRT – The Applicant notes that some statutory undertakers appear in the CA and LRT twice however this is intentional. They may appear once as a category 1 interest where a voluntary agreement is being sought and then again as a category 2 interest where their interest would be protected by protective provisions. This is intentional to ensure that the Examining Authority, and now Secretary of State, can see the status of both negotiations.</li> <li>▪ Some tenants included in the LRT may appear to be missing from selected temporary rights plots, however there are instances where the landowner has not confirmed if they wish for the tenant to be party in that agreement.</li> </ul> <p>Considering the points noted above, with regard to the specific examples noted by the Secretary of State, the Applicant’s position is as follows:</p> <ul style="list-style-type: none"> <li>▪ Betty Skipworth (Plot 33-038a) – This plot is not shown in the CA and LRT as it has the qualifier of “(as assumed owner)” due to the plot being unregistered. As there is no confirmed owner to agree terms with the plot has not been included within the CA and LRT.</li> <li>▪ Lindsey Marsh Drainage Board (Plot 02-006) – As Lindsey Marsh Drainage Board is both a Category 2 interest and a statutory undertaker, their interest in plot 02-006 should have been noted on the CA and LRT. The CA and LRT has now been updated to be consistent with the BoR.</li> </ul>
24	The Applicant	<p>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.</p>	

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			<ul style="list-style-type: none"><li>▪ Inconsistent application of changes – The Applicant has undertaken a full review of the BoR and the CA and LRT and made updates that now make these two documents consistent.</li></ul> <p>As noted above, only Category 2 interests who are statutory undertakers are included on the CA and LRT with a corresponding update on relevant protective provisions. As the Secretary of State is aware, following the representation from InterGen (C2-003), the Applicant and InterGen have been engaging over a set of protective provisions. Through those discussions it has transpired that neither InterGen (UK) Ltd or Spalding Energy Company Ltd are statutory undertakers as they are not holders of a gas transporter licence. As such, following the general rules noted above, both parties have been removed from the CA and LRT, but this does not mean negotiation of protective provisions is not ongoing. The Applicant's refers to its latest response to the Secretary of State on 5<sup>th</sup> December 2025 regarding this subject matter.</p>



## 2 References

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