



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

17 December 2025

Dear John Wheadon,

**Planning Act 2008, GTR4 Limited, Proposed Outer Dowsing Offshore Windfarm Order
All Interested Parties Consultation 5**

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 all interested parties consultation 5 issued by the Secretary of State for Energy Security & Net Zero on 17 November 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,

[Redacted]

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Marine Licensing Case Officer

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1. C3-031 8.13 Schedule of Mitigation V10 (Tracked)

- 1.1 The MMO notes the additional mitigation stated in Offshore Schedule of Mitigation and also within the updated Outline Cable Specification and Installation Plan (C3-017) and the updated Outline Scour Protection and Cable Protection Management Plan V7 (C3-033).
- 1.2 The MMO requests that the wording:
“Dropped objects will be reported and will be recovered where they pose a potential hazard to other marine users”
is updated to:
“Dropped objects will be reported and will be recovered where they pose a potential hazard to other marine users and/or marine life.”
- 1.3 The MMO does not believe there is any other new information that can be provided at this stage in relation to this document.

2. C3-025 28.2 The Applicant's Response to the Second Request for Information

- 2.1 The MMO notes Natural England's comments regarding Worst Case Scenario (WCS) for cable projection and that this may not fully reflect the need in the operational phase of the Project. The MMO has reviewed the Applicant's comments as set out paragraph 5a (C3-025), and Natural England's comments (REP6-147). The MMO highlights that other Offshore Wind Farm (OWF) installations' have required further cable protection, that either was not granted in their Development Consent Order (DCO), is outwith of their WCS, or not permissible in their Operation Maintenance Plan (OMP). The MMO is seeing increasing marine licence applications for operational phase Projects with the need to install cable protection systems (CPS) and placement of scour protection pads on cables and around the foundations.
- 2.2 Natural England highlighted that it advises *‘that compensation will be required at a greater scale to allow for this contingency.... the details (area and volume) should be set out within a named document and secured within the DCO/DML in agreement with Natural England and the MMO.’* The MMO notes that the Applicant's DCO (C1-015) states the area and volumes for inter-array cables and export cables, however, only provides volumes for Wind Turbines Generators (WTG), offshore accommodation platform, offshore electrical installations and offshore artificial nesting structures. The MMO requests that the maximum area for these structures is also stated to ensure clarity and enforceability.



- 2.3 Natural England provided a response to Secretary of State Consultation 3 (C3-029) justifying their position on why they consider this 20% figure to be incorrect. Within this document, Natural England noted that *'the MMO hold information on location of additional cable protection requests for Triton Knoll and Viking Link, which from that, extrapolations could be made for this project....if available this information could be used to refine the ODOW [Outer Dowsing Offshore Windfarm] ECC [Export Cable Corridor] CBRA [Cable Burial Risk Assessment]. However, we do recognise that if additional cable protection is required for ODOW it will be subject to a variation request and/or separate marine licence with an updated Habitats Regulations Assessment (HRA).'* The MMO confirms that it has not been approached for this information. The MMO agrees that if additional cable protection is required for ODOW beyond the assessed WCS, this will need to be addressed through a deemed marine licence variation or a new licence application, supported by an updated Habitats Regulations Assessment (HRA).
- 2.4 The MMO notes the Applicant's response acknowledging that a new marine licence application would be required for any further cable protection during the operational lifetime of the Project and any associated compensation is likely to be accessed through the Marine Recovery Fund. It remains the MMO's preference that the 20% figure is reviewed so that it is appropriate for the lifetime of the Project, noting the risk of failures on current OWF installations. The MMO emphasises that the Environmental Statement should account for the impacts associated with the Projects operational lifetime to ensure that the assessed envelope is realistic and precautionary.

Yours sincerely,

[Redacted Signature]

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Marine Licensing Case Officer

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