

Date: 17 December 2025
Our ref: 534996 /17782
Your ref: EN010130



Department for Energy Security & Net Zero
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BY EMAIL ONLY

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Dear Sir/Madam,

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010
Application by Outer Dowsing Offshore Wind Farm Limited (“the Applicant”) for an Order
granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm
(“Project”)**



The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Further Information (RFI) dated 17 November 2025.

In their letter of the 17 November, the Secretary of State (SoS) has invited all Interested Parties to comment on the information provided in response to their RFI’s dated 10 October and 29 October 2025.

Natural England’s response to this RFI is provided in Annex 1 and Annex 2 of this letter.

For any queries relating to the content of this letter please contact us using the details provided below.

Yours faithfully,


Norfolk and Suffolk Area Team
Marine Senior Officer
E-mail: @naturalengland.org.uk

Annex I Natural England's Summary of Advice in Response to the RFI dated 17 November 2025

Table 1 – Natural England's Advice

NE Ref	Documents submitted by the Applicant	Natural England's review with signpost to Annex where applicable
1.1	28.1 The Applicant's Response to RFI2 and All Parties Consultation Covering Letter	Natural England has no comments to make to this document.
1.2	28.2 The Applicant's Response to the Second Request for Information	Please see Natural England's comments in Annex 2 of this document.
1.3	28.3 The Applicant's Response to the All Parties Consultation	Natural England has no comments to make to this document.
1.4	28.4 Submission Documents Summary and Change Log	Natural England has no further comments to make to this document over and above advice provided to Document reference 28.2 in Annex 2 (NE Ref 1.2 above).
1.5	28.5 The Applicant's Response to the Second Request for Information- Wake effects	Natural England has no comments to make to this document.
1.6	29.1 The Applicant's Further Response to RFI3 Covering Letter	Please refer to Natural England's advice to the Outline Scour Protection and Cable Protection Management Plan v7 below (Table 1, NE Ref 1.16).
1.7	7.7.1 Kittiwake Compensation Plan V4	Natural England notes the updates to this document with regards to the approach to calculating the compensation quanta using the method outlined in Rhoades <i>et al.</i> 2025 ('the BTO method') and are in agreement with the values presented in Table 2.1. Natural England can confirm that when using the BTO method, we would be comfortable with a ratio of 2:1 in this specific instance, provided this is based on use of the Upper Confidence Limit (UCL) impact value, an approach which we see as needed to give sufficient assurance should the Secretary of State accept the Applicant's position regarding lead-in times and only require that the Artificial Nesting Structure (ANS) is in place at least two breeding seasons prior to impacts occurring.
1.8	7.7.2 Guillemot Compensation Plan V5	Natural England notes the updates to this document with regards to the methodology used for the calculation of compensation potential from the additional measures in the South West. We refer the Secretary of State to our response submitted on 07 November 2025 [C3-029] regarding Natural England's position on the potential of this measure.

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1.9	7.7.3 Razorbill Compensation Plan V5	Please refer to advice provided for 7.7.2. Guillemot Compensation Plan V5 above (Table 1, NE Ref 1.8)
1.10	7.7.4 Offshore Artificial Nesting Structure Evidence Base and Roadmap V5	Please refer to advice provided for 7.7.1. Kittiwake Compensation Plan V4 above (Table 1, NE Ref 1.7).
1.11	7.7.6 Additional Measures for Compensation of Guillemot and Razorbill V7	Please refer to advice provided for 7.7.2 Guillemot Compensation Plan V5 above (Table 1, NE Ref 1.8).
1.12	8.1.3 Outline Soil Management Plan V8	Natural England welcomes the commitment that " <i>Mowing and stripping will be avoided during wet conditions</i> " and acknowledges this commitment has also been updated within the Schedule of Mitigation. This issue is resolved.
1.13	8.5 Cable Specification and Installation Plan (CSIP) V9	<p>Natural England welcomes the Applicant's updates regarding benthic mitigation to the Cable Specification Installation Plan (CSIP) V9. While these are in line with our advice provided to the SoS at RFI 2 [C3-002, C3-029], to fully resolve Natural England's concerns, we advise that for sediment disposal, the commitments both within and outside the Inner Dowsing, Race Bank and North Ridge (IDRBNR) Special Area of Conservation (SAC) should include that a 50m buffer will be maintained from any Annex I <i>Sabellaria spinulosa</i> reef features to limit the potential for impacts to arise from sediment deposition. Also, the wording within the Schedule of Mitigation should be updated to reflect this commitment.</p> <p>However, noting our below advice to the Schedule of Mitigation V9 (Table 1, NE Ref 1.14), Natural England is concerned that while the CSIP sets out the Applicant's Worst Case Scenario (WCS) for removable cable protection within areas of Supporting Habitat for Annex I <i>Sabellaria spinulosa</i> reef habitat within IDRBNR SAC of 0.095km², the CSIP does not balance this by providing the WCS for removable cable protection on the Annex I Sandbank feature of the SAC, which is referenced from the Schedule of Mitigation (Item 3).</p> <p>Natural England advises the WCS for the Annex I Sandbank feature provided within Para 42 of the Outline Scour Protection and Cable Protection Management Plan V7 is included within the CSIP: "<i>The placement of removable cable protection (including e.g. rock bags or concrete mattresses),</i></p>

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		<p>covering up to 5% of the cable length for a total area of 5,760m² over the two sandbanks which the ECC overlaps with (Inner Dowsing and North Ridge) has been assessed in the ES.”</p> <p>We also draw your attention to Natural England's advice to the Schedule of Mitigation v9 (Table 1, NE Ref 1.14) where Natural England advises the WCS for cable protection over the Annex I Sandbank Feature has incorrectly referenced the WCS for supporting habitat for Annex I <i>Sabellaria spinulosa</i> reef.</p>
1.14	8.13 Schedule of Mitigation V9	<p>Natural England welcomes the updates within the Schedule of Mitigation v9. These updates are in line with our advice provided to the 2nd RFI [C3-002, C3-029]. Also, as per our advice within this letter we are content that benthic mitigation is appropriately secured within Outline CSIP v9 and Benthic Reef Mitigation Plan v5.</p> <p>However, we advise the SoS requests the Applicant to update the Schedule of Mitigation to also include the following:</p> <p>Item 57: No jack-up vessels within IDRBNR SAC. The Outline CSIP should be included within the Column 'Outline Document (where relevant)'. This is the named plan where the commitment is set out.</p> <p>Item 3: Removable Cable Protection. It is stated that the worst case scenario for removable cable protection is 0.095km². This mitigation item refers <u>only to Annex I Sandbank Feature</u>. Natural England believes that the Applicant's update had incorrectly referenced the WCS for the supporting habitat for Annex I <i>Sabellaria spinulosa</i> feature of 0.095km² Natural England advises the Applicant corrects this to the WCS of “5,760m² over the two sandbanks” as detailed within the Outline Scour Protection and Cable Protection Management plan v10.</p> <p>Item 43: In addition, to be consistent with the detail provided for the Annex I Sandbank feature, Natural England advises the WCS for removable cable protection on supporting habitat for Annex I <i>Sabellaria spinulosa</i> reef is incorporated within this item of the Schedule of Mitigation. Please note, Natural England's concerns remain regarding the Applicant's realistic WCS parameter for the total</p>

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		footprint of removable cable protection on supporting Annex I <i>Sabellaria spinulosa</i> reef habitat.
1.15	8.13 Schedule of Mitigation V10	Natural England has no further advice for the updates provided in v10 of the Schedule of Mitigation as long as the above advice provide on V9 are taken into consideration (Table 1, Ref 1.14).
1.16	8.21 Outline Scour Protection and Cable Protection Management Plan V7	Natural England welcomes the updates to the Outline Scour Protection and Cable Protection Management Plan V7 in relation to benthic commitment mitigation and notes that with cross references to the Cable Specification and Installation Plan (CSIP) V9, Biogenic Reef Mitigation Plan V5 and the Schedule of Mitigation V10, the agreed benthic mitigation is appropriately secured.
1.17	8.22 Outline Biogenic Reef Mitigation Plan V5	Natural England welcomes the Applicant's updates to the Outline Biogenic Reef Mitigation Plan V5. While these are in line with our advice provided to the SoS at the 2 nd RFI [C3-002, C3-029], to fully resolve Natural England's concerns, we advise that for sediment disposal, the commitments both within and outside the IDRBNR SAC should include that a 50m buffer will be maintained from any Annex I <i>Sabellaria spinulosa</i> reef features to limit the potential for impacts to arise from sediment deposition. Also, the wording within the Schedule of Mitigation should be updated to reflect this commitment.
1.18	20.17 Guillemot and Razorbill Compensation Quanta V6	Natural England notes the update to this document with regards to the ratio achievable by the Applicant's package of measures. We refer the Secretary of State to our response submitted on 07 November 2025 [C3-029] with regards to the ratios Natural England consider are broadly achievable, and our position on the ability of the Applicant's package of measures to successfully compensate for guillemot and razorbill.

Annex 2 Natural England's Advice to Document: 28.2 The Applicant's Response to the Second Request for Information.

Table 2: Natural England's Comments in Response to the Document: 28.2 The Applicant's Response to the Second Request for Information.

NE Ref	Para No.	Request	Applicant Response	Natural England Notes/Comment
2.1	11-12	<p>The Secretary of State notes that the Applicant's without prejudice compensation package for impacts to guillemot and razorbill includes 'additional compensation measures in the South-West' that may be carried out in collaboration with other wind farm developers, including Five Estuaries and North Falls.</p> <p>The Secretary of State also notes that Natural England recently provided advice (NE reference: 27347/519205) in response to Part 2 of the Secretary of State's first request for information for the Five Estuaries Offshore Windfarm. That advice stated Five Estuaries was recommended to adopt the North Falls approach to calculating compensation quanta (i.e. considering philopatry) to ensure calculation consistency across projects which may share compensation.</p> <p>Given that the Applicant also proposes this shared measure in collaboration with those same projects, Natural England is invited to comment on whether it would be appropriate for the</p>	<p>The Applicant confirms that the calculations provided use the Hornsea Four Approach and are consistent with the methods adopted by other projects (Five Estuaries and North Falls). Therefore, the overall compensation requirement remains unchanged.</p> <p>The additional analysis of natal dispersal used by those projects was intended to show the proportion of compensation benefits likely to disperse away from natal colonies versus the proportion expected to recruit back to them. However, this analysis did not alter the overall compensation requirement for those projects under this measure.</p> <p>When given the opportunity during the Examination, Natural England have not requested this additional information be presented in the same way as Five Estuaries or North Falls. The Applicant also notes that the Secretary of State did not apply philopatry in the guillemot compensation quanta calculation for Rampion extension project.³ The Rampion extension project is also a</p>	<p><u>Connectivity of compensation sites with NSN</u></p> <p>Natural England agrees with the Applicant that there is likely to be a degree of connectivity between the sites proposed for compensatory measures and the colonies that make up the UK National Site Network (NSN) for razorbill and guillemot. However, the extent and scale of this connectivity has not been well evidenced, particularly with regards to the degree of connectivity between the NSN and those sites to which impacts are predicted (i.e. Flamborough and Filey Coast (FFC) Special Protection Area (SPA) and Farne Islands SPA).</p> <p>Ring recovery data for auks ringed in the Channel Islands and recovered in Britain and Ireland is based on very small sample sizes (five guillemots and one razorbill). Contrary to the statement in paragraph 69 of 7.7.5 Without Prejudice Predator Control Evidence Base and Roadmap, no ringing recoveries for guillemot or razorbill ringed at FFC currently exist.</p>

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		<p>Applicant to provide the same calculations i.e. using the Hornsea 4 method but presented to show the proportion likely to disperse into the NSN, using a 0.17 natal dispersal rate for razorbill from Lavers et al. (2007) and the 0.58 rate for guillemot from Horswill and Robinson (2015). Furthermore, if these calculations are advised, Natural England are requested to confirm if it is appropriate for the Applicant to apply the above method only to the measures in the southwest, or across their wider proposed compensation package.</p>	<p>partner in the collaborative additional compensation measures proposed in the South-West.</p> <p>The Applicant met with Natural England on 23rd October 2025 and Natural England confirmed that given the suite of measures across a range of geographical locations being put forward by the Applicant, Natural England's position is that for the Project, they have greater confidence that compensation can be delivered and therefore philopatry need not be applied in this specific case.</p> <p>A full case for why considering natal dispersal is not ecologically relevant can be found in The Applicants Response to the Request for Information dated 12th August 2025 (document 27.2, C1-049), point 20, and has been summarised here:</p> <ul style="list-style-type: none"> ▪ Recruitment of guillemots to non-natal colonies, including NSN sites, is likely to be substantial, but specific recruitment rates cannot be quantified. Despite this uncertainty, compensation measures will still benefit the NSN by supporting healthy, well-dispersed regional populations, which enhances resilience against threats like Highly Pathogenic Avian Influenza (HPAI) and predation. 	<p>With regards to dispersal distances, we acknowledge that there are records of guillemots dispersing up to 1,897km and razorbills up to 625km (Wernham et al (2002)), so the dispersal of recruits from the Channel Islands to sites within the UK NSN is certainly possible. However, the true prevalence of natal dispersal at these greater distances is unknown and average dispersal rates are likely much lower (e.g. median distance of 97km for 78 birds, Wernham et al. 2002). Therefore, the proportion of birds that are likely to recruit to sites within the NSN is less clear.</p> <p>In summary, the predator control measure at Plémont may result in guillemots and razorbills dispersing to and recruiting into the NSN, but the current evidence base does not allow this to be reliably quantified. Nonetheless, the other two measures within the Applicant's package of measures, being implemented within the UK, provide greater assurance of direct recruitment into the NSN. Ringing of auks at each of the three locations, where feasible, has the potential to generate valuable data to improve our understanding in this area.</p> <p>It remains Natural England's advice that for the ODOU auk compensatory</p>

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			<p>Birds that do not recruit directly to NSN colonies will breed elsewhere, and their offspring may later recruit to NSN sites, creating a cumulative contribution over generations.</p> <ul style="list-style-type: none"> ▪ Connectivity between proposed measures and NSN colonies is well established through dispersal ranges and ringing recoveries, as accepted by the Secretary of State in previous decisions. While more precise recruitment data could theoretically be obtained through tagging, practical and ethical challenges make this unfeasible. Juvenile dispersal is variable and influenced by colony size and performance, with larger, successful colonies (often NSN sites) being more attractive to recruits. <p>Therefore, a significant proportion of dispersing birds are expected to recruit to NSN colonies, ensuring the measures provide appropriate compensation.</p>	<p>measures, there is no need for an additional step in the calculations to factor in philopatry into their requirements. Please see Annex 3 of [C3-029].</p>
2.2	15	Noting the advice provided in Natural England's response to the first information request which states that the method outlined in Rhoades et al., 2025 is a more ecologically robust method of calculating ornithological compensation than previously used	<p>NE's position is that the BTO method should be adopted because it incorporates demographic parameters such as productivity and dispersal, which they consider reduce uncertainty and may justify a lower compensation ratio [C1-007].</p>	<p><u>Validity of BTO method for calculating compensation quanta (Rhoades <i>et al.</i> 2025)</u></p> <p>The Applicant's statement that the British Trust of Ornithology (BTO) method assumes that ANS operate as a closed system is incorrect. The sustainable</p>

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		methods/formulae, the Secretary of State requests that the Applicant works with Natural England to apply the British Trust of Ornithology method outlined in Rhoades <i>et al.</i> to their calculations for kittiwake compensation.	<p>The Applicant considers the BTO method to be overly-conservative for the following reasons:</p> <ul style="list-style-type: none"> ▪ The BTO method assumes Artificial Nesting Structures (ANS) operate as closed colonies, from which only surplus birds contribute to compensation, and that no immigration occurs. These assumptions are biologically unrealistic and overly precautionary, ignoring natural kittiwake dynamics such as immigration and recruitment from floating adults. ▪ The method is highly sensitive to productivity rates. Offshore ANS are likely to achieve higher productivity than the regional average (0.819), with evidence of rates up to 1.07 from offshore platforms (Christensen-Dalsgaard et al., 2020). Using realistic productivity values using the BTO model significantly reduces the compensation requirement. <p>The Applicant maintains that a 3:1 ratio would be excessively precautionary, particularly given the inherent conservatism already embedded within the BTO method. The Applicant also notes Natural England's own comments in their response to RFI 1 [C1-007], which acknowledge that a lower ratio</p>	<p>dispersal rate it calculates in step 1 is a <i>net</i> dispersal rate i.e. the rate accounts for the number of birds the ANS is receiving as recruits as well as those it is exporting. Section 2.1 and Appendix 2 of Rhoades <i>et al.</i> 2025 sets out the explanation of the difference between gross and net dispersal and how the latter is calculated within step 1 of the method.</p> <p>Regarding productivity rates, we acknowledge the Applicant's argument that higher productivity rates may be achieved offshore due to closer proximity to food sources; however there is limited evidence to support this. The BTO report (Rhoades <i>et al</i> 2025) highlights that productivity rates vary considerably between populations and that models using productivity values from the impacted SPA are therefore likely to be more accurate. Whilst the expectation and hope is that productivity will be higher on the ANS than at onshore colonies, productivity rates would have to be considerably higher at the ANS than they are at FFC SPA in order to achieve the 0.819 rate. The average productivity rate for kittiwake at FFC SPA between 2015 and 2021 was 0.57 (Aitken et al 2017, Babcock et al 2015, Babcock <i>et al</i> 2016, Babcock et al 2018, Lloyd <i>et al</i></p>

NE Ref	Para No.	Request	Applicant Response	Natural England Notes/Comment
			<p>may be justified given the comprehensiveness of the methodology.</p> <p>The Applicant met with Natural England on 23rd October 2025. During these discussions, it was agreed that if the Applicant were to commit to using the Upper Confidence Interval (UCI) rather than the central impact estimate to calculate the required compensation, Natural England would be comfortable with a maximum compensation ratio of 2:1. This equates to a maximum of 720 nesting spaces.</p> <p>Should the Secretary of State agree with Natural England and adopt the BTO method using the UCI and a ratio of 2:1 or lower, the resulting compensation quantum would fall within a range that the Applicant is able to deliver alongside other requirements for auks.</p>	<p>2019, Lloyd et al 2020, Cope et al 2021)).</p> <p><u>Acceptance of UCL, BTO method and 2:1 ratio for compensation</u></p> <p>As outlined within our response to the first RFI, Natural England considers the BTO method outlined in Rhoades <i>et al.</i> 2025 to be the most ecologically robust method available. Furthermore, Natural England stated that a higher degree of confidence in the compensation requirement, as a result of the application of a more robust method could justify the use of a less precautionary compensation ratio, particularly when applied alongside the 95% Upper Confidence Limit (UCL) impact value to account for the potential for impacts to be greater than the Central Impact Value (CIV). However, Natural England are aware that the Applicant has stated that it is not feasible for the ANS to be in place more than two breeding seasons ahead of impacts occurring, and consider that if the Secretary of State is minded to condition a lead in time of only two breeding seasons, the use of the UCL in this case would give additional assurance that the ANS will deliver sufficient compensation over the lifetime of the Project.</p>

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				The Applicant has stated that provision of 720 nest spaces falls within the range that the Applicant is able to deliver and we can confirm that we are content with this scale of compensation for kittiwake.
2.3	17	In line with the request found in Natural England's response to the first information request, the Applicant is requested to amend Tables 8 and 9 of "Guillemot and Razorbill: Compensation Quanta" (document reference 20.17) to include the values for the predicted contribution of each site in the South West to the total of 1900 pairs for guillemot and 255 pairs for razorbill presented by the Applicant, and confirmation on which sites are still under consideration. Furthermore, the Applicant is requested to provide clarification of whether any revised calculations of potential for each site provided in response to the above request are based on data from both the 2024 and 2025 surveys or the 2024 surveys only.	In line with Natural England's request, the Guillemot and Razorbill: Compensation Quanta document (Document Reference 20.17, V6 submitted in response to RFI 2) has been updated to include the predicted contribution of each South West site to the total compensation requirement. Only Outer Dowsing shortlisted sites were included in the calculations (see Appendix C for a list of Outer Dowsing sites; Table 2-2). These updates follow a methodology agreed with Natural England on 23 October 2025, whereby it was agreed that the calculation methodologies used to estimate a realistic potential range of benefits from the proposed measures were the best available at this time. However, due to the low productivity observed in the 2024 and 2025 monitoring data, Natural England were hesitant to place significant weight on benefits derived from potential productivity increases.	With regards to the methodology used for the calculation of compensation potential from the additional measures in the South West, we refer the Secretary of State to our response submitted on 07 November 2025 [C3-029] regarding Natural England's position on the potential of this measure.