



# Marine Management Organisation

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

08 January 2026

Dear John Wheadon,

## **Planning Act 2008, GTR4 Limited, Proposed Outer Dowsing Offshore Windfarm Order All Interested Parties Consultation 8 and 9**

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 consultations 8 and 9 issued by the Secretary of State for the Department of Energy Security & Net Zero on 11 and 19 December 2025, respectively.

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,

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## 1. Documents reviewed

1.1 The MMO has reviewed the following documents submitted as responses from the Applicant and other Interested Parties to the Secretary of State's consultation letters dated 24 November 2025 (C7-001) and 10 December 2025 (C6-001):

- C6-002 Dogger Bank South Offshore Windfarm
- C6-003 The Applicant's Update on Discussions with InterGen Letter
- C6-004 The Applicant's Response to RFI4 Covering Letter
- C6-005 The Applicant's Response to the Fourth Request for Information
- C6-006 Book of Reference
- C6-007 Book of Reference Tracked
- C6-008 Schedule of Changes to the Book of Reference
- C6-009 Offshore In-Principle Monitoring Plan Clean
- C6-010 Offshore In-Principle Monitoring Plan Tracked
- C6-011 Outline Cable Specification and Installation Plan Clean
- C6-012 Outline Cable Specification and Installation Plan Tracked
- C6-013 Compulsory Acquisition and Land Rights Tracker Clean
- C6-014 Compulsory Acquisition and Land Rights Tracker Tracked
- C6-015 - Late Response to Secretary of State's consultation 6 - Eastern Inshore Fisheries and Conservation Authority (EIFCA)
- C7-002 Brown & Co
- C7-003 Perenco
- C7-004 The Crown Estate
- C7-005 Environment Agency
- C7-006 J B Boulton Julie Ann Mason
- C7-007 The Applicant's Response to the Fifth Request for Information Covering Letter
- C7-008 The Applicant's Response to the Fifth Request for Information

1.2 The MMO has provided comments where required in section 2-4 below. The MMO has no comments on any other updated documents.



## 2. C6-009 Offshore In-Principle Monitoring Plan (OIPMP)

2.1 On request from the Secretary of State, the commitments outlined in points 22, 28 and 41 to discuss and agree the thresholds of significance/change relevant to hypotheses and the thresholds/triggers for adaptive management with the MMO and its advisors Natural England is welcomed. The MMO would expect this to be fully detailed within the finalised IPMP prior to construction taking place. The MMO anticipates that discussions may be lengthy, and therefore would welcome the Applicant putting forward their thresholds upon review of their Environmental Statement, in a timely manner for advisors to consider.

2.2 The MMO commits to working with Natural England to formulate a definition for 'full recovery', to make it clear within the final IPMP.

2.3 The MMO notes the following updates:

- addition of sandbanks to Hypothesis 1, alongside sandwaves;
- drop Down Video (DDV) analyses to follow the 'reefiness' criteria as defined by Gubbay (2007);
- the commitment to undertaking post-construction surveys within 1 year of the cessation of construction activities, in the event that pre-construction surveys indicate the presence of habitats of principle importance/Annex 1 reef;
- the commitment to undertaking post-construction surveys within 1 year of the cessation of cable installation, in the event that pre-construction surveys indicate the presence of habitats of principle importance/Annex 1 reef within the Inner Dowsing Race Bank North Ridge (IDRBNR) Special Area of Conservation (SAC);
- grab sampling campaign to include both particle size and faunal analysis; and
- a staged monitoring approach to identify the most effective methods for collecting data on migratory bats.

2.4 The MMO welcomes the addition that all grab and DDV analysis undertaken as part of the pre-construction monitoring will include Invasive Non-Native Species (INNS) screening and identification. The MMO expects the submission of survey programmes and methodologies for the purposes of INNS monitoring for consideration, in the post-consent phase.

2.5 The MMO defers to Natural England regarding the proposed commitment to addressing at least one of the ornithological evidence gaps identified in the letter from the Secretary of State dated 24 November 2025, along with any collaborative monitoring with Dogger Bank South Offshore Wind Farm (OWF). The MMO notes the point raised by the Applicant which states that no formal definition of a joint monitoring approach can be given at this stage, until the post-consent phase.



### 3. C6-011 Outline Cable Specification and Installation Plan (CSIP)

3.1 The MMO welcomes the addition of the section addressing the worst-case scenario impact by square meter footprint for boulder clearance and cable burial activities through areas of supporting habitat for Annex 1 *Sabellaria spinulosa* reef within the IDRBNR SAC, and notes the approach used to include the entire SAC as the number and location of boulders are currently unknown prior to pre-construction surveys being carried out. The MMO advises that the DCO should also be updated with this worst case scenario information.

3.2 The MMO defers to Natural England regarding the appropriateness of the approach used, along with any changes required to the draft compensation plans.

### 4. Agreements with other developers

4.1 The MMO welcomes the Memorandum of Understanding (MoU) between the Applicant and Dogger Bank South, along with the commitment to explore options to work collaboratively to deliver post-consent ornithology monitoring.

4.2 The MMO defers to Natural England regarding the appropriateness and detail of collaborative ornithological monitoring, however the MMO would be content to facilitate any discussions if required.

### 5. Maximum Parameters in the DCO

5.1 The MMO noted in the most recent submission to the SoS on the maximum area/volume parameters in the DCO (C5-003). Signposting has been provided by the Applicant and the MMO can confirm that we are satisfied with the signposting and maximum area parameters noted in the DCO and our comment in 2.2 (C5-003) can be considered closed. The MMO would however, prefer that the volumes be separated for Wind Turbine generators (WTGs), Offshore Accommodation Platform, Offshore Electrical Installations and Artificial Nesting Structures within the Design Plan in the Post-Consent phase as this will assist in any considerations of volume to be deposited under the Operations and Maintenance Plan in the operational phase.

Yours sincerely,



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## 6. References

6.1 Gubbay, S. 2007. Defining and managing *Sabellaria spinulosa* reefs: Report of an inter-agency workshop 1-2 May, 2007, JNCC Report No. 405, JNCC, Peterborough, ISSN 0963-8091.

