

Date: 08 January 2026  
Our ref: 536107 / 17783  
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 11 December 2025.

In their letter of the 11 December, the Secretary of State (SoS) has invited all Interested Parties to comment on the information provided in response to their RFI dated 24 November 2025. Natural England’s response to this RFI is presented in Annex 1 of this letter.

Natural England wishes to note to the SoS that the RFI dated 19 December 2025 does not require further advice relevant to our remit.

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

Yours faithfully,

Helen Mann  
Norfolk and Suffolk Area Team  
Marine Senior Officer  
E-mail: [REDACTED]@naturalengland.org.uk

## **Annex 1 Natural England's Advice to the SoS RFI dated 11 December 2025**

Natural England has reviewed the following documents applicable to Natural England's remit in response to the RFI dated 24 November 2025.

- 33.1 The Applicant's Response to RFI4 Covering Letter [C6-004]
- 33.2 The Applicant's Response to the Fourth Request for Information [C6-005]
- 8.3 Offshore In-Principle Monitoring Plan (Tracked) [C6-010]
- 8.5 Outline Cable Specification and Installation Plan v10.0 (Tracked) [C6-012]

### **8.5 Outline Cable Specification and Installation Plan v10.0 (Tracked) [C6-012]**

Natural England has no further advice to the updates provided within the Outline Cable Specification Plan v10.0.

### **8.3 Offshore In-Principle Monitoring Plan Rev 5.0 (Tracked) [C6-010]**

Natural England welcomes the updates made by the Applicant to the Offshore In-Principle Monitoring Plan (IPMP) [C6-010]. Natural England provides the following advice on the latest updates to the IPMP:

#### Section 3.1.3 and 3.3.3 Hypotheses

1. We understand that the hypotheses presented in the IPMP [C6-010] are intended to provide an indication of the hypotheses which may be tested, with the final hypotheses and precise wording presented in the final monitoring plans. We also note that the thresholds of significance/change relevant to hypotheses and triggers for adaptive management are to be discussed and agreed with the MMO, and following consultation with their advisors which will include Natural England. Whilst this is clarification is welcomed; we advise that the final hypotheses will need to be drafted to ensure that they are testable, and that any relevant success criteria is agreed, which if not met would trigger additional monitoring or the implementation of mitigation or management measures to avoid adverse effects.

#### Table 3.1 In-Principle Monitoring Proposed - Marine Physical Processes

2. Natural England welcomes the updates made to Table 3.1 for Physical Processes monitoring. With regards to the monitoring survey design, we advise consideration of: optimal survey timing and frequency for the different parameters to be measured, effective review periods (to allow conclusions to be drawn with respect to the hypotheses), selecting scour monitoring locations that are representative of the seabed characteristics (e.g. presence of significant mobile bedforms), and incorporating regional/local beach profile/coastal monitoring data, where available, in the nearshore environment monitoring. Natural England advises this consideration is reflected within Table 3.1.

#### Table 3.2 In-Principle Monitoring Proposed - Benthic and Intertidal Ecology

3. Natural England advises that for monitoring of Habitats of Principal Importance, the Applicant should make it clear that the '*assessment of the elevation of dead or living tubes ≥5cm (average) and the extent of encrusting S. spinulosa tubes*' is specifically to assist with assessment of supporting habitat for reef and not presence of existing reef.

4. Useful information is provided in the Applicant's response [C6-005] regarding the 'survey methods for the optional parameters outlined in Natural England's Appendix C2 (submitted at Deadline 3 [REP3-067])'. Natural England advises this information detailing the Applicant's intended approach to each of the essential and optional parameters to define supporting habitat for Annex I *Sabellaria spinulosa* reef is also provided within the IPMP, so that the Applicant's proposed commitments are available for reference post consent when the IPMP is further developed, reviewed and discharged by the MMO.

Notably within Table 3.2, it should be outlined that pre-construction seabed imagery (drop down video; DDV) data will be used as well as grab sampling and that existing data will be used to define wave action/tidal flow. We also concur with the Applicant's, inclusion of reference to the IPMP being a framework to be developed in consultation with Natural England post consent phase, in recognition that further refinement of the Applicant's monitoring approach to the essential and optional parameters is likely occur.

5. Natural England advises that Habitats of Principal Importance should be correctly spelt within the document. Under track changes 'Principal' has been incorrectly changed to 'Principle'.

### Section 3.6 Offshore and Intertidal Ornithology

6. Natural England welcomes the updates made by the Applicant to the offshore and intertidal ornithology section of the Offshore IPMP [C6-010], specifically the commitment to address one of the evidence gaps outlined within Paragraph 53 for offshore ornithology, and to develop their monitoring plan in consultation with Natural England post-consent; we look forward to working with the Applicant on this.
7. Natural England wish to reiterate the importance of colony-based studies in generating the demographic data that inform our collective understanding of SPA colony health, including for the purpose of impact assessments and integrity judgements. This is particularly the case for species like guillemot and razorbill at Flamborough and Filey Coast (FFC) SPA. The recent declines in productivity for these species highlighted in our end of Examination position statement [REP6-149] and falling to new lows this year (Ryan *et al.* 2025) are an important factor in our advice that, despite increases in colony size, adverse effects on integrity cannot be ruled out for these SPA features, given they indicate the potential for future declines in colony growth rate, which in turn has implications for the significance of the predicted in-combination impacts of offshore windfarms.
8. Natural England has also noted the joint statement from the Applicant and Dogger Bank South offshore windfarm, as outlined in paragraph 56 and supported by Dogger Bank South's submission [C6-002], regarding the intention to explore options for working collaboratively to deliver post-consent monitoring for offshore ornithology. Natural England are content at this stage that a commitment to relevant and effective post-consent monitoring for offshore ornithology has been made within the IPMP, the details of which can be determined through post-consent consultation with Natural England and the MMO.

### References

Ryan, A., Aitkin, D., O'Hara, D. 2025. Flamborough and Filey Coast SPA Seabird Monitoring Programme 2025 Report. Available online at: [REDACTED]