

Date: 27 November 2024
Our ref: Case: 17783 Consultation: 494381
Your ref: EN010130



National Infrastructure Planning
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Dear Sir/Madam,

Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an Order Granting Development Consent for the Outer Dowsing Offshore Wind Project

The following constitutes Natural England's formal statutory response for Examination Deadline 2.

1. Natural England's Deadline 2 Submissions

For Deadline 2, Natural England has reviewed the documents relevant to our statutory remit submitted by the Applicant at Deadline 1 (24th October 2024). An update of Natural England's position regarding these documents is provided in Annex 1, including anticipated timing of responses. Natural England is also submitting the following, signposted from Annex 1:

- EN010130 494381 ODOW Appendix K - Natural England's Response to ExA's Written Questions 1 at Deadline 2
- EN010130 494381 ODOW Appendix K1 – ExQ1 OR 1.2 - Summary of Disagreements in Offshore Ornithology Assessment Methodology
- EN010130 491137 ODOW Appendix J2 - Natural England's NE Risk and Issues Log Deadline 2

2. Deferred responses

As outlined within our previous written submissions, owing to the volume of documentation submitted since the Relevant Representations deadline, we continue to defer our response on the In-Principle Monitoring Plan (IPMP) [APP-245], in addition to the Outline Project Environmental Monitoring Plan (OPEMP) [APP-277] until a suitable juncture in the examination timetable.

Natural England is awaiting a decision from the ExA regarding the outcome of the change request submitted by the Applicant in relation to the Offshore Restricted Build Area (ORBA). Therefore, no advice has been provided from Natural England in response to the ExA questions involving the ORBA, instead this will be deferred to a later deadline once a procedural decision has been made. This has been indicated where appropriate in Appendix K.

3. Offshore and Intertidal Ornithology

Natural England acknowledges that we had intended to provide full technical advice at Deadline 2, with the intension to have advised whether our concerns in relation to the impact assessments had been addressed, and if they had, provide advice on Offshore Ornithology impacts. However, because the change request for the ORBA has not yet been accepted by the ExA, this update will be postponed until an appropriate deadline. However, our Deadline 2 response Appendix K1 provides a summary table detailing the current state of play in regard to our impact assessment methodology concerns, which we hope both the ExA and the Applicant find useful.

4. Benthic Ecology – Supporting habitat for Annex I *Sabellaria spinulosa* reef

Natural England will be providing further advice on potential impacts from cable installation on supporting habitat for Annex I *Sabellaria spinulosa* reef within Inner Dowsing, Race Bank and North Ridge SAC at Deadline 3.

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

Yours faithfully,

Polly Mills and Ellie Casey
Norfolk and Suffolk / Sussex and Kent

E-mail: E-mail: [REDACTED]

Telephone: [REDACTED]

Annex 1: Natural England’s Response to the Applicant’s Documents Submitted for Response at Deadline 2 Relevant to our Remit, along with Outstanding Documents that Natural England will be Responding on in due course.

PINS Document Reference	Document Name	Natural England’s Response/Position Summary
General		
REP1-001	18.1 The Applicant's Deadline 1 Covering Letter	Natural England has no comments to make on this document.
REP1-002	1.2 Guide to the Application	Natural England has no comments to make on this document.
REP1-003	2.0 Schedule of Changes for Plans	Natural England has no comments to make on this document.
REP1-004	2.5 Land Plans (Part 1 of 2)	Natural England has no comments to make on this document.
REP1-005	2.5 Land Plans (Part 2 of 2)	Natural England has no comments to make on this document.
REP1-017	7.9 Compensation Funding Statement (tracked)	Natural England has no comments to make on this document.
REP1-024	18.6 The Applicant's response to the ExA’s request for further information in relation to the proposed ORBA and the revision to the Offshore ECC	Natural England has no comments to make on this document at Deadline 2.
REP1-038	18.21 The Applicant’s Change Notification	Natural England has no comments to make on this document at Deadline 2.
REP1-039	18.22 The Applicant’s Change Request dated 24 October 2024	Natural England has no comments to make on this document at Deadline 2.
APP-276	8.3 Offshore In Principle Monitoring Plan	Please refer to Section 2 of this cover letter. Advice will be provided at the appropriate juncture during examination.
DCO		
REP1-007	3.1 Draft Development Consent Order (tracked)	Natural England has provided an update in our Risks and Issues log in relation to this document
REP1-008	3.1.1 Schedule of Changes to the Draft Development Consent Order	Natural England has provided an update in our Risks and Issues log in relation to this document
PD1-025	3.1 Draft Development Consent Order Tracked	Natural England has provided an update in our Risks and Issues log in relation to this document
PD1-026	3.1.1 Schedule of Changes to the Draft Development Consent Order	Natural England has provided an update in our Risks and Issues log in relation to this document
PD1-028	3.2 Explanatory Memorandum Tracked	Natural England has provided an update in our Risks and

PINS Document Reference	Document Name	Natural England's Response/Position Summary
		Issues log in relation to this document
AS1-025	3.1 Draft Development Consent Order Tracked.pdf	Natural England has provided an update in our Risks and Issues log in relation to this document
AS1-026	3.1.1 Schedule of Changes to the Draft DCO.pdf	Natural England has provided an update in our Risks and Issues log in relation to this document
Offshore and Intertidal Ornithology		
AS-001	Ornithology Population Viability Analysis Parameter Log.pdf	Natural England has not reviewed this document at this stage in light of the proposed ORBA.
AS-005	Chapter12 Appendix 5 Migratory Collision Risk Modelling.pdf	Natural England has no comments to make on this document at Deadline 2.
AS1-041	6.1.12 Chapter 12 Offshore and Intertidal Ornithology Tracked.pdf	Natural England has no comments to make on this document at Deadline 2.
AS1-100	7.1.1 Offshore and Intertidal Ornithology Apportioning Tracked.pdf	Natural England has no comments to make on this document at Deadline 2.
Offshore Restricted Build Area (ORBA)		
PD1-081	15.9 Environmental Report for the Offshore Restricted Build Area (ORBA) and Revision to the Offshore Export Cable Corridor (ECC).pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-082	15.9A ORBA and Revision to the Offshore ECC Appendix A Figures_Part 1.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-083	15.9A Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor Appendix A Figures – Procedural Deadline 19 September. Part 2 of 2.	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-084	15.9B Procedural Deadline 19 September Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor Appendix B Blockage Modelling Results	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-085	15.9C ORBA and Revision to the Offshore ECC Appendix C Underwater Noise Modelling Report.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.

PINS Document Reference	Document Name	Natural England's Response/Position Summary
PD1-086	15.9D ORBA and Revision to the Offshore ECC Ornithology Baseline Summary.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-087	15.9E ORBA and Revision to the Offshore ECC Appendix E Collision Risk Modelling.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-088	15.9F ORBA and Revision to the Offshore ECC Appendix F Offshore Ornithology Displacement Assessment.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-089	15.9G ORBA and Revision to the Offshore ECC Appendix G MRSea Modelling for Offshore Ornithology.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-091	15.10 HRA for the ORBA and Revision to the Offshore ECC.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.
PD1-092	15.10A HRA for the ORBA and Revision to the Offshore ECC Appendix A Offshore and Intertidal Ornithology Apportioning.pdf	Natural England will provide a response to this document once a procedural decision is made regarding the ORBA change request.