



**National
Trust**

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29 October 2024

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
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For the attention of Lead Member of the Examining Authority
By email only : DoggerBankSouth@planninginspectorate.gov.uk

Interested Party Reference number: 20050110

Dear Ms Dowling

Application by RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd for an Order granting Development Consent for the Dogger Bank South Offshore Wind Farms

Your Ref: EN010125

Thank you for the letter dated 22 October 2024 providing the opportunity for the National Trust to provide our views on the timeframe and the outstanding matters in respect of progression of the HRA compensation proposals for the above project.

The ExA will note in our Relevant Representation [RR-038] that we expressed our concern that the Examination timeframe would provide limited opportunity to discuss and agree whether a deliverable scheme was likely for compensation and considered that discussions should have been progressed much earlier to provide more certainty at the outset of the Examination process. There is still no certainty that there is an opportunity to deliver the compensation proposed on the National Trust sites suggested.

We want to highlight that the applicant (RWE) approached the National Trust at a very late stage in the pre-application process for their DCO; the first meeting to formally discuss the prospect of using National Trust land for compensation measures was held on 11 June 2024 with the Northern Ireland team, the day before the DCO application was formally submitted to the Planning Inspectorate.

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Regional Advisory Group Chair: Janet Dugdale
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Current situation

Since acceptance of the application for Examination on 10 July 2024 we have had two wider meetings with RWE involving all relevant National Trust staff, the first on 28 August 2024 and most recently on 9 October 2024. The first meeting was an introductory one where RWE set out their approach to compensation and the methodology to date which had led to the identification of a number of potential compensatory sites on National Trust land. The second call was to discuss a request for access to Sheep Island and the detail of the surveys to be undertaken over the winter of 2024-25.

Whilst we have stated to the applicant any surveys would be at their own risk and without prejudice to any case we may present subsequently during the Examination process, at this point the access request for Sheep Island has not been granted by the National Trust's Northern Ireland region. The reason for this is that there is a prospect we may not agree to the use of Sheep Island for compensation for this specific project and consider it would be unreasonable for us to allow the applicant to undertake the costs of potentially abortive survey work. Key decision makers within the organisation will review and consider the proposal and a decision on this matter will be taken early in November and communicated to RWE.

Should Sheep Island proceed, then we understand the outcome of the survey work and production of a feasibility study would not be available until early 2025. Time would then be needed by ourselves to review the outcome of the study as we take an evidence-based approach to our decision making when engaging with Major Infrastructure proposals. The National Trust will therefore need to be provided with additional evidence of the known rat issue on the island, looking at what is being undertaken by the Department of Agriculture, Environment and Rural Affairs (DAERA) funded project this year and complementing or amplifying the level of information. We would then need to see details of proposed compensation measures which would provide a reasonable prospect of success, again taking into account any measures which result from the DAERA funded works. We could not agree to a Memorandum of Understanding with the applicant until we have this evidence and details of the proposed compensatory measures.

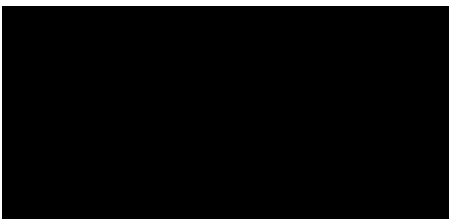
If Sheep Island is not acceptable to the National Trust we understand the applicant would pursue an alternative option to discuss the use of Worm's Head, a National Trust mainland site in Wales. We are aware that RWE visited the site offshore without any prior notification or discussion/input with us and we have had no discussion on specifics to date. There is a land bridge to the headland at low tide that results in significant numbers of people walking out to the headland that has impacts on the bird interest and would add additional challenges to securing adequate compensation here. It is therefore important to highlight also that a decision would need to be taken by that regional team on the use of the site to deliver compensation measures for this DCO project.

If Worm's Head is to be explored as an option, there is no current survey data available to confirm the presence of rats and we understand from our ecologist that successful survey
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work could only be undertaken in the spring during the bird nesting season. This would indicate a much longer timeframe for subsequent review of any survey work being possible, based on the approach we have already set out that we would want to take.

I am sorry we cannot provide more certainty to the ExA at this stage, but this has entirely been brought about by the applicant not approaching the National Trust until this summer (2024). We will continue to engage positively with the applicant and their consultants as we are keen to support the development of renewable energy projects and can see there may be the potential to deliver benefits for nature. We will not however feel pressured into agreeing to the use of National Trust land without necessary consideration and due diligence taking place.

Yours sincerely



Mrs Natasha Rowland MRTPI
Planning Adviser (North)

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