

**This letter is sent by email only**

Jo Dowling,  
Lead Member of the Examining Authority,  
Dogger Bank South Offshore Wind Farm,  
National Infrastructure Planning,  
Temple Quay House,  
2 The Square,  
Bristol. BS1 6PN.



29 October 2024

Dear Jo Dowling,

**Application for an order granting consent for the Dogger Bank South Offshore Wind Farms  
Rule 9 and Rule 17 letter dated 22 October 2024**

**RSPB Registration ID: 20050122**

I am writing further to your letter dated 22 October 2024 requesting the views of the Applicant and Interested Parties on when sufficient information on the outstanding matters highlighted in the letter would be available, such that the ExA could re-open the Preliminary Meeting, redraft the Examination timetable and commence the examination. In considering our response, we have also reviewed the transcript of the Preliminary Meeting and the Applicant's letter dated 14 October 2024 (AS-006).

We understand from your letter that you are seeking views in relation to the proposed updates from the Applicant on offshore ornithology and HRA compensation proposals and how these should be reflected in a revised timetable. This is to enable the ExA's recommendations to the Secretary of State to be fully informed.

Continued/...

---

**RSPB Headquarters**

RSPB The Lodge  
Potton Road  
Sandy  
SG19 2DL

**Tel:** 01767 680 551

**f** @TheRSPB

**✉** @natures\_voice

**©** @rspb

**rspb.org.uk**



The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

**Patron:** His Majesty The King **President:** Dr Amir Khan **Chief Executive:** Beccy Speight

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654.  
Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

Having considered the Applicant's letter dated 14 October 2024 (AS-006) and the concerns set out in our Relevant Representation, we have concluded that in order to assist the ExA, we will need to understand in more detail the scope of what updated information will be provided by the Applicant and when the necessary information will be available viz:

- **Impact predictions:** Revisions to the offshore ornithology aspects of the Environmental Statement (ES) and the Report to Inform Appropriate Assessment (RIAA) in relation to:
  - o The extent to which they will address Natural England and RSPB concerns;
  - o How significant the updates will be in terms of better understanding the scale of impacts using the different parameters preferred by the Applicant, Natural England and the RSPB;
- **HRA compensation measures:** when will more developed compensation proposals in respect of seabirds be submitted. In line with our Relevant Representation, the RSPB remains of the view that substantively more information is required to assess the Applicant's proposed compensation measures to consider whether they each have a reasonable guarantee of success. Key issues remaining to be addressed include, but are not limited to:
  - o Generic issues:
    - Agreeing the nature/magnitude of impacts (and resulting compensation requirements) using the different parameters referred to above. This will help the ExA understand the range of compensation options to be considered (see Impact predictions above);
    - Site selection for each measure (see specifics below);
    - Based on experience, it would be helpful to set out draft success criteria for each proposed measure for review during the examination.
  - o Kittiwake measures:
    - Confirmation of the project-led site(s) selected;
    - Explanation of the risks associated with the supply chain and logistics for construction of an offshore ANS and implications for meeting implementation commitments ahead of first turbine operation e.g. securing specialist vessel access. Description of how these risks will be managed to avoid implementation delays;
    - Clarification from the Applicant and/or The Crown Estate on the interaction between the post-consent Crown Estate strategic process with any post-consent project level process. This is in relation to final site selection under the Crown Estate led Kittiwake Strategic Implementation and Monitoring Plan. For example, how will the risks identified under the previous bullet point be managed for non-project led oANS sites.
  - o Guillemot and Razorbill:
    - Confirmation of the Applicant's current reduced short list of potential predator eradication locations;
    - Confirmation of whether the evidence needs identified in the RSPB's relevant representation will be presented to the examination. These centre on establishing the ecological need for, and benefit of, any proposed eradication to the impacted seabirds – here Guillemot and Razorbill i.e. predation of Guillemot/Razorbill at each short-listed location, evidence predation is detrimental to those species at that location, evidence that eradication can be successfully implemented and sustained, and the availability and scale of suitable nesting habitat for Guillemot and Razorbill. Where this evidence will not be available, what evidence will be presented and a description of its limitations and risks to successful implementation of measures to benefit Guillemot and Razorbill;

- The Applicant has indicated it plans to report on site visits already undertaken and to undertake feasibility studies over the winter 2024/25. In respect of the feasibility studies, among other things, we understand the Applicant will be seeking evidence on seabird predation, which is relevant to the issues described above. It would be helpful if the Applicant can confirm whether these feasibility studies will cover all locations on its reduced short-list. The timing of the availability of the information collected in these feasibility studies to the examination appears important in respect of the ExA's request;
- In relation to the proposed feasibility studies, it would be helpful to have confirmation what level of detailed, site specific eradication planning work will be presented to the examination and when.

Given the need for further clarification from the Applicant on the above matters, we are currently unable to advise on the implications for the examination timetable. However, we note that substantive information remains to be submitted, in particular with regards the proposed Guillemot and Razorbill compensation measures.

Yours sincerely,

Andrew Dodd  
Head of Casework