



National Infrastructure Planning Temple
Quay House
2 The Square
Bristol
BS1 6PN

The Wildlife Trusts Interested Party Reference 20050046

14 November 2024

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

Rule 9 and Rule 17 response

The Wildlife Trusts apologises for the delayed response to the Rule 9 and Rule 17 letter. We welcome the opportunity to respond and raise concerns we have regarding the lack of detail in the planning application for Dogger Bank South Offshore Wind Farms, particularly relating to compensation for auks.

1. The Wildlife Trusts engagement in auk compensation

- 1.1. The Wildlife Trusts contacted the applicant on 3rd July 2024 after we became aware that the applicant had been approaching a number of individual Wildlife Trusts, including Ulster and the Isles of Scilly Wildlife Trust, on the potential to develop project level predator eradication measures as a compensation for impacts to auks.
- 1.2. We raised concerns with the applicant regarding the lack of coordination on the development of compensation for auks, particularly since such a large amount of resource and effort has taken over the past 2 years to develop a more strategic approach to the development and delivery of compensation via the Collaboration on Offshore Wind Strategic Compensation (COWSC).
- 1.3. The Wildlife Trusts held the first meeting with the applicant to discuss auk compensation on the 22nd July 2024. The Wildlife Trusts made it clear at this meeting that our preference was for auk compensation to be delivered as a strategic compensation measure.

1.4. The Wildlife Trusts have continued to engage with the applicant and provided updates on the progression of the development of a strategic predator eradication programme on the Isles of Scilly.

2. The Wildlife Trusts position on auk compensation and the Isles of Scilly

2.1. The Wildlife Trusts and the Isles of Scilly Wildlife Trust have been working together to develop a long-term predator eradication programme on the Isles of Scilly which will benefit multiple bird species creating resilient populations into the future. With the Isles of Scilly Wildlife Trust, we are in the process of gaining funding to develop predator eradication operational and maintenance plan alongside a programme of community engagement. Within the next year, we hope to have a fully costed predator eradication programme developed which can sit on the strategic compensation library for offshore wind.

2.2. After careful consideration, The Wildlife Trusts and Isles of Scilly Wildlife Trust have decided that we can only take predator eradication forward on the islands as a strategic compensation measure, to be funded by the Marine Recovery Fund. We are happy to work with industry to explore what an interim approach could look like in lieu of the Marine Recovery Fund being established, but we cannot take individual payments from developers to deliver the programme on the Isles of Scilly. Being associated with rigid planning conditions associated with individual projects could put the delivery of a long-term conservation measure at risk. The programme on the Isles of Scilly must be developed within timescales which are appropriate for the measure.

2.3. Associated with this, the Isles of Scilly Wildlife Trust cannot provide permission to individual developers to undertake surveys on the island in relation to individual project proposals for predator eradication. We are happy to discuss evidence needs which fit within the wider programme of predator eradication on the islands and how developers can support this via a strategic approach.

3. Final remarks

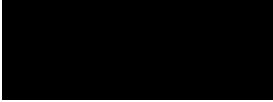
3.1. The Wildlife Trusts outlined in our Relevant Representation concerns regarding the lack of detail within the application for Dogger Bank South, particularly in relation to compensation for auks.

3.2. The Wildlife Trusts have engaged in many offshore wind planning applications for many years, particularly in relation to compensation for impacts to protected habitats and species. It is our experience that the delay seen in offshore wind applications over the past 5 years has been due to incomplete applications and a lack of environmental measures to manage impacts. The Wildlife Trusts are dedicating a large amount of resource outside of individual projects to develop strategic compensation solutions such as predator eradication on the Isles of Scilly, which would provide compensation for multiple projects. However, without an operational Marine Recovery Fund, developers and delivery bodies such as The Wildlife Trusts lack a mechanism to deliver effective compensation measures.

3.3. We are continuing to meet with Defra and the Offshore Wind Industry Council to progress the development predator eradication on the Isles of Scilly as a strategic compensation measure. We are happy to keep the applicant and Examiner updated

as this progresses to allow Dogger Bank South and any other offshore wind farms to financially contribute via the Marine Recovery Fund or an interim solution towards the delivery of strategic compensation programme on the Isles of Scilly. We would welcome a conversation through examination on the possibility of securing a strategic compensation measure as a DCO condition.

Your sincerely



Joan Edwards
Director, Policy and Public Affairs