



**National
Trust**

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20 May 2025

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

Dear Ms ██████████

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

Interested Party reference number: 20050110

This letter seeks to provide an update to the Examining Authority on the National Trust's position in respect to Worm's Head, which is one of the sites where the applicant would like to pursue compensation measures for Auks.

As confirmed at Hearing Session 5 on 10 April 2025, the applicant completed initial drone surveys at Worms Head in January this year and the outcomes of this were shared with the National Trust. This first stage confirmed the presence of rats on the headland and it also identified potentially suitable habitats for additional nest spaces on the headland.

Although we have continued to engage positively with the applicant since January and most recently discussed the next stage of survey work to be undertaken, we have continued to maintain our reservations about the challenges of securing compensation measures on a headland which has a causeway link and public access at low tide. (As advised in our letter to the Exa dated 29 October 2024).

The National Trust has remained open minded about opportunities for predator control and/or eradication measures but it has become increasingly clear that the physical measures are not

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Patron: His Majesty The King
Regional Advisory Group Chair: Janet Dugdale
Director of Region: Mike Innerdale

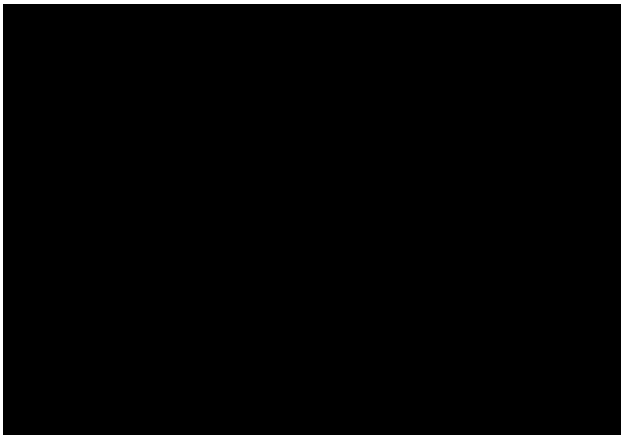
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Registered charity number 205846

going to be workable for the organisation. Barriers would present significant practical issues for public access across common land as well as create unacceptable visual impacts on the Gower National Landscape and impacts potentially for other species. Further, the challenges of maintaining fencing and biosecurity measures would require significant long term commitment.

The National Trust has therefore taken a strategic level decision that a site specific proposal at Worms Head will not be supported. We have advised RWE of this decision and felt it fair to do so now before they incur the costs of further survey work which would inevitably be abortive.

The National Trust considers that the best opportunity for compensation measures for adverse impacts on Auk species is presented by the Marine Recovery Fund (MRF) where strategic measures, which can support the delivery of ecologically feasible and deliverable proposals which would provide compensation for bird populations affected by marine development can be defined. We have responded to the MRF consultation and are supportive of its establishment, recognising that done well, the MRF has the potential to improve the delivery of compensation, focussing on areas where the greatest benefits will be felt and at an appropriate scale and pace. We would hope that this new compensation mechanism can be put in place swiftly to support the drive towards net zero and decarbonisation, while ensuring the natural environment is protected, and where possible enhanced. We consider this should be the preferred mechanism to deliver compensation where it can be agreed in consultation with the relevant seabird recovery groups.

Yours sincerely



Planning Adviser (North)

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