

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email: DoggerBankSouth@planninginspectorate.gov.uk

Dyddiad/Date: 27 May 2025

Er sylw / For the attention of: Caroline Hopewell

Annwyl / Dear Caroline,

PROPOSED DOGGER BANK SOUTH OFFSHORE WIND FARMS

**CYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE
REFERECE: EN010125**

EIN CYFEIRNOD / OUR REFERENCE: AOS-25639

**RE: NATURAL RESOURCES WALES' RESPONSE TO THE EXAMINING AUTHORITY'S
SECOND WRITTEN QUESTIONS**

Please find below NRW's Response to the Examining Authority's second set of written questions (ExAQ2), published on 13 May 2025.

The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008.

Our comments are made without prejudice to any further comments or advice we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by RWE Renewables UK Dogger Bank South (West) Limited and

RWE Renewables UK Dogger Bank South (East) Limited ('the Applicant'), the Examining Body or other interested parties.

NRW is happy to engage with the Applicant throughout the examination process, and, should the application receive a Development Consent Order, post-consent, where necessary.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact [REDACTED]
should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,

[REDACTED]

[REDACTED]
Marine Services Manager
Natural Resources Wales

[CONTINUED]

Marine Ornithology

OR2.10 Survey results for Worms Head

The applicants:

- a) NE advises [REP4-125] that in addition to the additional surveys the applicants have committed to make during May/June 2025 at Worms Head, that consideration should also be made as to whether:
 - i) rats can access the identified areas of suitable guillemot and razorbill nesting habitat and are therefore having a negative impact on auk populations and
 - ii) prevention of re-incursions at this site is feasible given its connectivity with the mainland and high visitor use.

Could the applicants consider these points and submit the results into the examination along with the survey results?

- b) Could the applicants confirm whether NRW have been and are being consulted regarding auk compensation proposals at Worms Head?

NRW: The ExA would welcome your position on questions a) and b) above and any general points you wish to make on the applicants' proposals for auk compensation at Worms Head.

NRW's response to OR2.10

NRW provided advice to the Applicant on their proposals for Worms Head via email in April 2025. A number of concerns were raised by NRW to the Applicant at this time, which included:

- Before proceeding further, we recommend that the Applicant gives serious consideration to the feasibility of eradicating rats from a narrow peninsula attached to the mainland, and how to prevent them from returning. As rats can access intertidal areas and can swim long distances, we cannot identify any feasible means of preventing them from returning to Worms Head.
- The Worms Head is part of the Gower National Landscape/Area of Outstanding Natural Beauty (AONB), which requires careful consideration in terms of visual impacts to the landscape from the proposed works.
- The site is part of the Gower Coast: Rhossili to Porteynon SSSI, which is designated for guillemot and razorbill, in addition to other features such as plants and lower plants, marine habitats, invertebrates and geology and geomorphological features. We advise that SSSI consent/assent would need to be sought from NRW, working with the landowner.
- The Applicant would also need to consider potential health and safety implications regarding public access to the land.

Currently, the issues outlined above suggest that there may be considerable barriers to the use of this area for compensation. All of these would need to be addressed by the Applicant,

working with the landowner. NRW would be happy to discuss this further with the Applicant, however we note that previous engagement earlier in the year ceased due to issues raised by the landowner. We advise that the Examining Authority and/or the Applicant engages with the National Trust on this matter.