

Hannigan, Georgiana

From: Richard Le Sueur [REDACTED]
Sent: 05 November 2025 18:19
To: Outer Dowsing Offshore Wind
Cc: consultations@naturalengland.org.uk
Subject: Re: EN010130/project-updates - ODOW, proposed mitigation now seriously delayed, maybe to be refused, at Plémont, Jersey

Categories: EO

Dear Case Team

I write again in connection with the Predator Eradication in Jersey (Plémont Seabird Sanctuary) as Compensation for Guillemot and Razorbill, which appears as item 10 on page 3, and item 13 and 14 on page 4 of the Secretary of State (SoS) information request letter of 21 October 2025 to Natural England and others.

The planning permit needed to create this so-called sanctuary, although approved by the Minister for the Environment in Jersey in draft back on 8 May 2025, needed an agreed Planning Obligation Agreement (POA) to turn it into a valid permit. A POA was agreed and the permit eventually validated and issued on 23 October 2025, this being the decision date.

However in accordance with Article 19(8) of the Planning and Building (Jersey) Law 2002, planning permits in Jersey do not come into effect for 28 days immediately after the decision date if representations have been made. In this case many representations were made, both for and against the Predator Exclusion Fence.

Then under Article 108 a third party is permitted to appeal, under certain circumstances and with payment of a fee, as set out under Article 112. If such an appeal is accepted as valid within 28 days then the permit is stayed until such time as a hearing takes place with a Planning Inspector making a recommendation to the Minister for the Environment to make a new decision. The new decision can be to allow the appeal and quash the permit, or can be vary the decision, or can be to let the permit stand.

This process from validation of a third party appeal to the Minister's decision I note from the gov.je website is expected to take 16 weeks, however we have known it take 36 weeks.

I have to inform you that a third party appeal has been made today against the granting of this permit. It has been accepted by the States of Jersey Judicial Greffe who oversee this procedure, and is only awaiting the banking of a cheque to turn it into a valid appeal.

I will let you know as soon as I hear the appeal has been validated and the permit is stayed (for four to nine months). This alone puts the programme for compensation out of kilter with what has been proposed by the applicant. Furthermore I believe the appeal has an excellent chance of success, which would take the compensation at Plémont, Jersey, out of the equation completely.

While writing, some further comments on the appearance of Plémont on pages 3 and 4:

Item 10. *'predator control likely to be effective at Plémont'??* This statement has been disproved by my late submission paper sent in 09/06/2025. I note Natural England (NE) take up many of the same issues - against which ODOW via their Jersey partners have just resent earlier non-peer reviewed speculative jottings.

Item 13. NE *'are invited to specifically comment on whether the Applicant's commitment of extending the extent of predator control measures to the 14ha of public land and National Trust Jersey land to the south and west of the fenced area is satisfactory to resolve their concerns surrounding the scale of the measure, and the ability for the measure to avoid predator reinvasion.'*

Please pass on my observations to NE and the SoS - there has been no publicity regarding the possibility of trapping on public land and publicly accessible open NTJ land adjacent. I very much doubt this would be acceptable to the public, and in any case would only lead to a minimal and temporary reduction in rat and ferret numbers. In any case I don't believe it is within the powers of the applicant to offer this 'commitment' and suspect this is just wishful thinking.

Item 14. NE *'are requested to provide any commentary on the "Plémont Seabird Sanctuary Biodiversity Research 2017-2024"'*

My observations are:

This is not a peer-reviewed paper.

Permission was not obtained from many of the landowners where trapping took place.

Brown rats have been resident in Jersey for over three hundred years and are hardly non-native.

The drop in numbers of breeding seabirds appears greatest between the wars, with minimal numbers breeding since the 1960s.

No correlation has been shown to link predators with this decline.

Note: the study area was for a fence three times the length of the present scheme, have the proposed benefits been scaled back accordingly?

Precedent eradication success stories are not accepted as relevant.

In Lundy the rats had nothing much else to eat - at Plémont they have a large potato dump nearby.

Rats are seen on the beaches and around the base of the cliffs, and given the 12 metre rise and fall in tide (far greater than in the precedent locations)

it will be easy for them to invade via the ends of the fence

The ferrets feast on the rats and rabbits - there is no need for them to chase a puffin down a cliff face.

There are no observations of ferrets or rats adjacent to seabirds, nor is there any DNA analysis of droppings.

For many of the reasons given above I do not consider this a valid research document and cannot see how it can assuage any of NE concerns raised.

I am copying this email to Natural England and would be happy to speak with them in connection with any of the above.

I'll keep you informed of the progress and validation of the third party appeal here in Jersey but 'fear' that with the long delay and potential (I think probable) refusal of the fence that the entire Plémont Jersey compensation must be discounted.

If you have any queries please do not hesitate to contact this office.

Regards

Richard Le Sueur
M.A. Dip.Arch(Cantab.) RIBA ARB

Richard Le Sueur Architects Ltd

Architects for award winning El Tico, St Ouen's Bay
Jersey Architecture Commission Design Awards 1999 - 2024, People's Choice Award 2015
Civic Trust Award, Royal Academy Summer Show Architecture Prize 2011
Stop Press! - 2024 Jersey Architecture Commission Design Award Winner for Airlie, St Brelade

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On 1 Sep 2025, at 16:06, Outer Dowsing Offshore Wind
<OuterDowsingOffshoreWind@planninginspectorate.gov.uk> wrote:

Hi Richard

Thanks for your email.

'Department' refers to the department for energy security and net zero, which is the relevant secretary of state.

Your comments were accepted by the secretary of state and will be published on our website.

Kind regards

Outer Dowsing Case Team
National Infrastructure
The Planning Inspectorate
outerdowsingoffshorewind@planninginspectorate.gov.uk
0303 444 5000

From: Richard Le Sueur [REDACTED]
Sent: 30 August 2025 11:14
To: Outer Dowsing Offshore Wind <OuterDowsingOffshoreWind@planninginspectorate.gov.uk>
Subject: Re: EN010130/project-updates - Outer Dowsing Offshore Wind, a simple question

Hi again

Apologies for seeking further clarity - just not sure what you mean by 'department'. Is this the Secretary of State? Or the Planning Inspectorate?

If my late comment has been accepted by the SoS as a post-examination submission, does this now mean that it will be published alongside further consultation responses asked for by the SoS by 9th September, sometime after 9th September?

Regards

Richard Le Sueur

M.A. Dip.Arch(Cantab.) RIBA ARB

Richard Le Sueur Architects Ltd

*Architects for award winning El Tico, St Ouen's Bay
Jersey Architecture Commission Design Awards 1999 - 2024, People's Choice Award 2015
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On 29 Aug 2025, at 12:03, Outer Dowsing Offshore Wind
<OuterDowsingOffshoreWind@planninginspectorate.gov.uk> wrote:

Good afternoon Richard

Thank you for your email and apologies for the delay in responding.

We can confirm that the Secretary of State has accepted your comments as a post-examination submission.

If you choose to make further submissions these will again be sent directly to the department. Any submission made as part of a consultation held by the Secretary of state will be published once the consultation closes. Non-Interested party submissions connected to a consultation are passed to the department to decide whether they wish to use their discretion to accept them. If accepted they will be published alongside the consultation responses received from the department.

Kind regards

Outer Dowsing Case Team

National Infrastructure

The Planning Inspectorate

outerdowsingoffshorewind@planninginspectorate.gov.uk

0303 444 5000

From: Richard Le Sueur [REDACTED]
Sent: 21 August 2025 12:17
To: Outer Dowsing Offshore Wind <OuterDowsingOffshoreWind@planninginspectorate.gov.uk>
Subject: Re: EN010130/project-updates - Outer Dowsing Offshore Wind, a simple question

Hi Georgie

not a registered interested party

That's fine, that's what I thought.

So, the Planning Inspectorate has forwarded my comments to the Secretary of State (many thanks for this). Does this mean that the Secretary of State has already had to make a decision whether to accept this submission? How can I tell if the Secretary of State has made a decision either way?

Or is it just sitting there and the discretion only applies if I make a further submission?

Many thanks

Regards

Richard Le Sueur
M.A. Dip.Arch(Cantab.) RIBA ARB

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On 21 Aug 2025, at 09:41, Outer Dowsing Offshore Wind
<OuterDowsingOffshoreWind@planninginspectorate.gov.uk> wrote:

Dear Richard,

Thank you for your email.

If you have signed up to receive project updates on the project webpage you will receive an email if a project update is posted on the webpage. If you have not already signed up you can sign up using the following link: [Get updates | Outer Dowsing Offshore Wind \(Generating Station\)](#)

I can confirm you are not a registered interested party. Following the project being accepted for examination members of the public were able to register to have their say on the application by submitting a relevant representation. This process is known as registering to be an interested party. Only members of the public who register to have their say during the pre-examination stage, and therefore become an interested party, have a right to be involved in the examination of the application. As you are not a registered interested party it is at the discretion of the Secretary of State as to whether to accept any submission that you make.

Kind regards,

Georgie

Georgiana Hannigan
NSIP Officer- National
Infrastructure (Energy)
Planning Inspectorate
T 0303 444
5000 | **Direct**
line [REDACTED]

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From: Richard Le Sueur [REDACTED]
Sent: 20 August 2025 13:49
To: Outer Dowsing Offshore Wind <OuterDowsingOffshoreWind@planninginspectorate.gov.uk>
Subject: Re: EN010130/project-updates - Outer Dowsing Offshore Wind, a simple question

Hi Georgie

Many thanks again.

I note your comment that registered interested parties may be invited to comment on certain matters during the current stage. As nothing further has appeared on the project information page since 12th August, I presume this has not happened.

From your earlier email I note with surprise and pleasure that my late submission was still sent to the Planning Inspectorate and was then submitted to the Secretary of State alongside the Examining Authorities recommendation report.

My question is: am I a 'registered interested party'?

Regards

Richard Le Sueur
M.A. Dip.Arch(Cantab.) RIBA ARB

Richard Le Sueur Architects Ltd
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]

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On 20 Aug 2025, at 13:23, Outer Dowsing Offshore Wind
<OuterDowsingOffshoreWind@planninginspectorate.gov.uk> wrote:

Dear Mr Le Sueur,

Thank you for your email.

The Outer Dowsing Offshore Wind project is now in the decision stage. Members of the public are not involved at this stage and the Planning Inspectorate does not expect to receive any comments or further information. If it does receive any submissions the Planning Inspectorate's case team will send them to the Secretary of State.

The Secretary of State may invite interested parties to comment on certain matters during this stage. If this happens information about how they can have their say will be sent to all registered interested parties and published on the project information page: [Outer Dowsing Offshore Wind \(Generating Station\) - Project information](#)

As this stage of the process is managed by the department, the Planning Inspectorate cannot advise on whether there will be an opportunity for parties to respond to any consultation responses that may be received.

Further information regarding the stages of the NSIP process can be found in the published advice page: [Nationally Significant Infrastructure Projects: The stages of the NSIP process and how you can have your say - GOV.UK](#)

Kind regards,

Georgie

Georgiana Hannigan
NSIP Officer- National
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From: Richard Le Sueur [REDACTED]
Sent: 13 August 2025 13:00
To: Outer Dowsing Offshore Wind <OuterDowsingOffshoreWind@planninginspectorate.gov.uk>
Subject: Re: EN010130/project-updates - Outer Dowsing Offshore Wind, a simple question

Hi Georgie

Thank you very much for your most helpful reply.

I have now been notified that the Secretary State has asked for responses for Information from the Applicant and others by September 9th, and will post these online asap after September 10th.

Will there be any opportunity for the public or other parties to respond further after the 10th, given that I have called out the Applicant for using misleading and inaccurate information in the current

application? I am concerned that given the short timescale available for the applicant to respond, further factual nonsense will be submitted in relation to the Plémont Seabird Sanctuary (paragraphs 19 to 23 refer).

If you have any queries please do not hesitate to contact this office.

Regards

Richard Le Sueur
M.A. Dip.Arch(Cantab.) RIBA ARB

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On 25 Jul 2025, at 12:50, Outer Dowsing Offshore Wind
<OuterDowsingOffshoreWind@planninginspectorate.gov.uk> wrote:

Dear Mr Le Sueur,

Thank you for your email.

The update that was received on the 10th July 2025 was to alert those registered to receive updates for the project that the recommendation stage for the Outer Dowsing Project had been completed. The recommendation stage is where The Examining Authority writes its recommendation report. This must be completed and sent to the relevant Secretary of State within 3 months of the end of examination stage.

We have now entered the decision stage. This stage is where the relevant Secretary of State then reviews the report and makes the final decision. They have 3 months to make a decision.

The recommendation report is not made available until the decision has been made by the Secretary of State.

Version 11 of the draft development consent order is the final version that the applicant submitted at the final examination deadline. This does not mean that this is the final version of the development consent order as the Examining Authority in their recommendation report will have provided recommendations to the Secretary of State for potential amendments. It is for the Secretary of State to decide what will be included in the final development consent order.

All the information that was provided to the Examining Authority to assist them in making their recommendation is available on the project website. You may find it useful to check the Examination Library: [EN010130-000660-Outer Dowsing Examination Library.pdf](#)

I can confirm that the submission that you made to the Planning Inspectorate was submitted to the Secretary of State alongside the Examining Authorities recommendation report.

The Planning Inspectorate has produced a number of advice notes regarding the development consent order process. They can be viewed online: [Detailed information](#)

You may find it useful to read the following advice note: [Process guide - The process for Nationally Significant Infrastructure Projects \(NSIPs\)](#)

I hope the above information is helpful.

Kind regards,

Georgie

Georgiana Hannigan
NSIP Officer- National Infrastructure (Energy)
Planning Inspectorate
T 0303 444 5000
www.gov.uk/pins

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From: Richard Le Sueur [REDACTED]
Sent: 23 July 2025 15:47
To: NI Enquiries <NIEnquiries@planninginspectorate.gov.uk>
Subject: EN010130/project-updates - Outer Dowsing Offshore Wind, a simple question

You don't often get email from [REDACTED]

Hi NIEnquiries

A simple question I hope.

I have registered and have been following the above **Outer Dowsing Offshore Wind project** application.

I was informed 10th July that:

The Examining Authority's recommendation has been sent to the Secretary of State

What is the recommendation?? Why isn't this available?

Is the Draft DCO v11 as submitted 11th April 2025 the 'final' version of an agreement that has gone off for approval?

Please can you explain the process to me?

Bizarrely Jersey (we are outside of the UK) is involved in a draft of this application and I need to know if the Jersey aspect of the mitigation has been accepted by the EA and has gone on to the SoS as an essential part of the works?

Regards

Richard Le Sueur
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