



The Planning Inspectorate  
National Infrastructure Planning  
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Application Reference: EN010109  
ESC Reference: 20032925  
Date: 16 February 2023  
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Dear Sirs,

Re: Application by Equinor New Energy Limited for an Order Granting Development Consent for the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project – East Suffolk Council’s Deadline 1 Written Representation submission (Monday 20 February 2023) including Local Impact Report (Annex A), Oral Summary of Case at Issue Specific Hearing 1 (Annex B) and responses to Examining Authority’s Written Questions 1 / WQ1 (Annex C).

East Suffolk Council (ESC) notes the Examining Authority’s (ExA) procedural decision in reference to Written Representations being requested from Interested Parties, other persons and statutory parties, in line with Rule 10 of The Infrastructure Planning (Examination Procedure) Rules (EPR) 2010. Written Representations are to be submitted by Monday 20 February 2023 (Deadline 1) as defined in the final Examination Timetable set out in Annex A of the Rule 8 letter (27 January 2023).

This letter provides ESC’s Written Representation for consideration at Deadline 1. It also provides ESC’s Local Impact Report (Annex A), Oral Summary of Case at Issue Specific Hearing 1 (Annex B), and ESC’s response to the Examining Authority’s Written Questions 1 / WQ1 (Annex C).

To avoid unnecessary repetition, ESC’s strategic position on kittiwake compensation together with a detailed description of the associated issues and concerns relating to human/bird conflicts within our District remains as set out in our Relevant Representation (RR-030) and as summarised in our oral statement made at Issue Specific Hearing 1 (ISH1) held on 18 January 2023. Our strategic position has also been elaborated upon within our Local Impact Report contained within Annex A and our responses to the Written Questions contained within Annex C to this letter.

Both Equinor and ESC have agreed not to prepare a Statement of Common Ground (SoCG) at this stage of the Examination, noting that this would be less helpful to the ExA at this early stage of discussions on kittiwake compensation measures as nothing has yet been conclusively decided.

At ISH1, the Applicant set out their preferred options for kittiwake compensation through providing additional nesting capacity at Gateshead, stating that this would meet their anticipated compensation requirements. It is therefore understood that the proposed artificial nesting capacity initially proposed within Lowestoft has been shelved considering ESC’s strategic position and the issues and concerns raised, specifically, our objection to the proposal within the Town of Lowestoft and our preference to see

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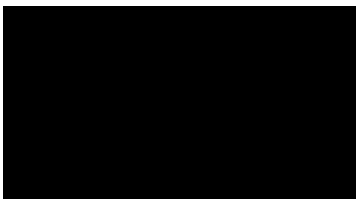
compensation for offshore wind development being delivered more strategically or collaboratively.

We acknowledge that delivery of the Applicant's alternative project-led proposal for kittiwake nest site improvements at Gateshead is progressing positively and alone is considered sufficient to fully meet the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project's compensation requirements for kittiwake. This approach is supported by ESC given the concerns already expressed regarding the existing human/bird conflict within the Town of Lowestoft and surrounding areas.

However, as stated in our oral representation at IHS1, ESC would be extremely disappointed if the Lowestoft proposal were to be brought back on to the table in the latter stages of the examination should the Applicant's preferred Gateshead proposal not be realised for any unforeseen reasons. We await confirmation from the Applicant in support of the position expressed in their oral representation at ISH1, providing ESC and the Examining Authority with confidence and clarity on this matter for the remainder of the Examination.

ESC supports kittiwake compensation measures where these are appropriately located with a balance of planning considerations having been given sufficient weight in site selection. We will however oppose any additional capacity for nesting within populated, sensitive, or urban areas (such as within the Town of Lowestoft for example) in order to minimise human interaction with nesting kittiwakes and to avoid further exacerbating the existing issues associated with nesting sites such as noise, smell and the accumulation of bird mess. Any proposal for artificial nesting capacity within East Suffolk would be required to demonstrate that every opportunity for coordination with other projects has been fully explored before any new (or enhanced capacity at existing sites) will be considered or supported.

Yours faithfully



Philip Ridley BSc(Hons) MRTPI | Head of Planning and Coastal Management  
East Suffolk Council