



The Planning Act 2008

*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 Local Impact Report

Deadline 1: Monday 20 February 2023

Application: EN010109

East Suffolk Council: 20032925

East Suffolk Council (ESC) notes the Examining Authority's procedural decision in reference to Local Impact Reports (LIRs) being requested from host and neighbouring, lower and upper tier Local Authorities, in line with s60 and s56A of the Planning Act 2008, to be submitted by Monday 20 February 2023, which is Deadline 1 in the draft Examination timetable set out in the Rule 6 and 8 letters. The following table therefore provides a summary of the potential impacts relating to kittiwake compensation which reflects the points raised within our Relevant Representation (RR-030).

Local Impact Report Summary	
Topic	East Suffolk Council (ESC's) Justification
ESC's Strategic Position on kittiwake compensation measures / issues associated with kittiwake nesting sites	<p>ESC supports gull conservation measures where these are appropriately sited with terrestrial planning considerations having been given sufficient weight in site selection. We will however oppose any such proposal in proximity to heavily populated, sensitive, or urban areas (such as within the Town of Lowestoft for example) in order to minimise any human interaction with nesting kittiwakes and to avoid further exacerbating the existing issues associated with nesting sites such as noise, smell and mess.</p> <p>The introduction of additional nesting capacity at existing sites in the Town will effectively burden the Council and the owners of the buildings on which the birds nest, with significant and ongoing cleaning and maintenance requirements which is something we will not be able to sustain. The Environmental Protection team already receive complaints each year due to nesting gulls in the town and such complaints cost time and money to investigate and rectify. Adding additional nesting capacity in the central urban areas of Lowestoft is not supported by ESC as this would only add to the natural growth of the existing kittiwake population in an area already experiencing human bird conflict.</p> <p>ESC's strategic position seeks to avoid proliferation of artificial nesting structures within our District, particularly around sensitive areas. Experience indicates that compensation proposals for kittiwake artificial nesting aims to be located in proximity to existing colonies of kittiwakes and this results in hot spots within the East Suffolk District where different developers seek to explore similar requirements in similar locations, exacerbating existing issues.</p> <p>To clarify ESC's preferences on kittiwake compensation measures in numerical order:</p> <p>1 – compensation provided elsewhere out of district avoiding existing conflicts and local sensitivities;</p>

	<p>2 – if provision is sought within ESC, Applicants will be required to coordinate provision reducing local impacts associated with human / bird conflicts (i.e. relating to noise, smell, mess, hygiene concerns and visual appearance at nest sites);</p> <p>3 – only once preference 1 and 2 have been fully exhausted will a new bespoke project alone solution be considered, however this will require planning input for site selection and constraint mapping from the initial stages with no guarantees of local planning authority support should such provision be deemed to exacerbate existing issues.</p>
<p>Coordination requirement</p>	<p>ESC is concerned that DCO compensation requirements to address impacts on seabirds, particularly kittiwakes, are not being considered strategically, both geographically and across different projects. This is of particular concern given the expected quantity of projects coming forward in our coastal areas over the next decade to meet the Government’s ambitions. The uncoordinated approach to the delivery of artificial nests in this region could lead to a significant oversupply which will never be filled by increases in colony sizes. Requirements for these structures have previously been imposed on developers in the latter stages of the development consent process with no tangible benefits being offered at that time to the local coastal communities set to host them.</p> <p>Any proposal for artificial nesting within East Suffolk will therefore 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 by the Council. Other developers with similar compensation requirements have been steered away from within the Town of Lowestoft due to the existing issues associated with human/bird conflict at nesting sites.</p> <p>ESC has recently had to engage at a post-consent stage with several other offshore wind promoters who have received DCOs for their projects but are seeking kittiwake compensation in East Suffolk. Having not been engaged on this matter for other projects during the examinations, this has proven to be very challenging and puts significant additional pressure on council resources.</p> <p>East Suffolk Council is keen to work with project promoters in finding an acceptable solution to kittiwake compensation, however we will continue to raise significant concerns regarding the siting of additional artificial nesting in urban settings. We will work with project promoters who are willing to explore coordination with other promoters at suitable locations away from these areas or appropriately located in the nearshore environment where potential terrestrial planning constraints (including seascape visual impacts) are found to be more manageable in the</p>

	right location. Developer costs should not restrict opportunities for coordination and ESC will be taking a consistent approach with all project promoters seeking such compensation requirements within our District.
--	--