



**National
Trust**

██████████@nationaltrust.org.uk
20th April 2023

Online submission: Planning Inspectorate

Your Ref: EN010109

Our Ref: 20033322

Dear Sir/Madam

Application by Equinor for an Order Granting Development Consent for the Sheringham and Dudgeon Extension Project (EN010109)

Procedural Deadline 3 Submission: Updates from the National Trust

This written update is made on behalf of The National Trust for Places of Historic Interest or Natural Beauty (“the Trust”). It updates the National Trust’s position on matters of interest to us, which were set out in our Written Representation [REP1-134](#).

Onshore Archaeology

As set out in our Statement of Common Ground with Equinor, the National Trust is satisfied that archaeological trial trenching is not required to inform the assessment of impacts pre-application and that evaluation will be completed post consent.

The Applicant has advised that it will consult with the Archaeological Advisor to Norfolk County Council and the National Trust’s Archaeologist at the post-consent stage to agree the details of the archaeological strategy across land under the ownership of the National Trust.

The National Trust notes that the Outline Written Scheme of Investigation (Onshore) (Revision B) [REP1-029] has been updated to include the National Trust as a named consultee for works affecting Trust owned land and that a suitable and appropriate methodology for the archaeological work on the Sheringham Estate will be secured through the discharge of the relevant DCO requirement.

The National Trust does not have any outstanding concerns relating to onshore archaeology.

Impact on Sandwich terns at Blakeney Point

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As set out in our Written Representation, the National Trust does not consider that the compensation proposals put forward by the Applicant for the Farne Islands represent additionality to our existing management proposals and those set out in the draft NNR management plan for the Farne Islands, a copy of which was submitted to the Planning Inspectorate at Deadline 2.

The National Trust submitted a Written Response in lieu of attendance for Issue Specific Hearing 5 (Offshore Matters). The Trust has listened to the recording of the hearing and wishes to make the following comments.

On the issue of the Energy Security Bill, we note that the Planning Inspector asked the Applicant whether the Farne Islands Management Plan would become a Government document. The Applicant indicated that it would be. We note that Natural England has not advised whether or not this would be the case. In their submission in lieu of attendance to ISH5 ([AS-041](#)) dated 23rd March 2023, their response to question 5i is N/A (although we acknowledge that this question is directed at the Applicant). PINS should seek clarity on this issue from Natural England.

At the ISH5, the Applicant interpreted Natural England's written response to mean that if the Farnes were ruled out, that habitat creation at Loch Ryan alone would deliver adequate compensation. However, Natural England's written submission in lieu of attendance states at 5iv "Natural England advocates development of compensation packages comprising multiple measures to provide resilience should an individual measure fail or underperform. If habitat creation at Loch Ryan was the sole measure brought forward this would inevitably raise the level of risk regarding whether sufficient compensation would be provided, also noting that the Loch Ryan scheme is at present some way from being secured".

At ISH5, the Applicant maintained that the proposed 400 nest boxes plus 400 shelters plus cameras demonstrated additionality, despite Natural England, the National Trust and the RSPB not agreeing this would be the case. It is not clear to the National Trust where the Applicant proposes to place so many nest boxes and shelters. The Habitats Regulations Derogation: Provision of Evidence Appendix 2 - Sandwich Tern Compensation Document [APP-069](#) states "This work will be carried out at Farne Islands SPA, within the area preferred by Sandwich terns for nesting. Detailed site selection to confirm the exact location/s would be undertaken in consultation with National Trust taking into account local constraints and other ecological and practical considerations". Available and suitable space for interventions on the Farne Islands is limited, as most of the area is keenly contested by breeding seabirds. The Sandwich tern nesting area is also very fragile due to puffin burrows. Therefore, the significant number of nest boxes and shelters proposed may not be physically possible in the space available.

The National Trust has had no further correspondence or discussions about Sandwich tern compensation measures with Equinor since ISH5.

The National Trust remains of the view that without a satisfactory derogation case and alternative compensation measures which are also considered acceptable by Natural England, the proposal would give rise to an adverse effect on the integrity of the Sandwich tern feature of the North Norfolk Coast SPA.

Landscape, Visual & Ecological Impacts

Weybourne Woods was declared inalienable in order to protect views from Sheringham Park and prevent inappropriate development. Construction impacts on Weybourne Woods and the AONB have been identified as moderate significance and adverse impact in the submitted Landscape and Visual Impact Assessment (Examination Document Ref: APP-112). Furthermore, it is proposed to remove an area of forestry at the HDD launch and reception pit.

In our Relevant Representation the National Trust indicated that it is not clear from the application documents what landscape, arboricultural and ecological mitigation and enhancements are proposed.

Since submitting our Relevant Representation, the National Trust has met with the Applicant to discuss this issue. It is understood that replacement trees will not be proposed along the cable route or in the location of the reception pit. It is understood that at this stage only baseline habitat surveys have been undertaken. The Applicant has advised the Trust that pre-construction surveys would be carried out and these would inform the proposed landscape, arboricultural and ecological mitigation and enhancements.

The National Trust has reviewed the Outline Landscape Management Plan (APP-303), the Outline Ecological Management Plan (APP-304) and the 'The Applicant's Comments to Relevant Representations' (REP1-033). The Trust acknowledges that the outline management plans provide a framework from which to agree the detailed plans post consent through the discharge of the relevant DCO requirement. The Trust acknowledges and is pleased that the Outline Landscape Management Plan (Revision B) and the Outline Ecological Management Plan (Revision B) have been updated to include the National Trust as a named consultee for works effecting Trust owned land.

The National Trust does not have any outstanding concerns relating to landscape, visual and ecological impacts.

Acquisition of Land and Rights over inalienable land at Weybourne Woods

The Trust has been working with Equinor to agree terms for access that will cause minimal impact and disruption, with a view to securing a signed Option Agreement and Deed of Easement for the requisite cables and access over and under Trust land. Whilst the majority of terms have now been agreed, there is still disagreement over the need for the easement to be in perpetuity, and we await suitable reasoning to be presented by the developer. Therefore, the Trust's concerns about this application as expressed here remain partially unaddressed.

Yours faithfully

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