



National
Trust

██████████@nationaltrust.org.uk
20th June 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)

Issue Specific Hearing 7 – Written submission in lieu of attendance

Agenda item 9: The extent, suitability and security of Habitats Regulation Assessment compensation for offshore ornithology.

Thank you for the invitation from the Examining Authority (ExA) to speak at Issue Specific Hearing 7. We note that the National Trust are listed as an Interested Party that the ExA would like to hear from at the Hearing. Unfortunately, we are unable to attend the hearing, however, we have reviewed the agenda and would like to offer our comments in writing on the agenda items we consider to be of relevance to the National Trust. We are of course happy to address any further points in writing as part of the subsequent issue of the Examiner's Written Questions and/or at Deadline 7 and 8.

9. i. Update from Applicant on the compensation measure at Blakeney and expected progress before the close of the examination.

This is a matter for the Applicant.

9. ii. Position from Natural England and National Trust on suitability and effectiveness of the proposed compensation measure.

Predator impact on Sandwich Terns at Blakeney Point is an ongoing issue. It is challenging and complicated, as highlighted in the Applicants response to the Examining Authority's Third Written Questions (REP5-049, Q3.14.1.6). Normal site management measures have not successfully identified or resolved the problem.

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The National Trust is supportive of the Applicant's approach so far to an outcome focussed research project concerning predation at Blakeney Point. We understand that the Applicant is preparing a draft framework for compensation, and we will continue an open dialogue with the Applicant and other stakeholders on this matter. However, at the present time the framework is not advanced enough to enable the Trust to comment on suitability and effectiveness. The National Trust will provide further responses and update our position at Deadlines 7 & 8.

The Trust understands that the proposal would be secondary compensation (primary compensation would be at Loch Ryan). In order to be effective, it must be ensured that the primary compensation is appropriate and deliverable. Also, that any secondary compensation at Blakeney Point is secured by a Requirement and/or legal agreement as appropriate.

9. iii. Views from Natural England and National Trust on the risks (if any) of the compensatory measure.

At the present time there is insufficient information available to enable the Trust to comment on the risks of the compensatory measure. The National Trust will provide further responses and update our position at Deadlines 7 & 8.

9. iv. Final thoughts on whether the Applicant's overall proposed package of compensatory measures is suitable and robust, and meets the requirements of the HRA process.

This is a matter for Natural England and we defer to their advice.

I trust this information is helpful to the Examining Authority.

Yours faithfully

Nina Crabb

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