

The National Trust (the Trust) has set out its interest in this proposal and position on renewable energy in our Relevant Representation (RR). To avoid repetition, this submission should be read alongside the RR (RR-241).

We maintain our position that we do not support proposals which would give rise to an Adverse Effect on the Integrity (AEol) of the qualifying features of a European site without satisfactory compensation. Appropriate compensation must be secured, in accordance with the Habitats Regulations Assessment.

The conclusion of the Applicant's Report to Inform Appropriate Assessment (RIAA) (Document Reference: 7.1, Part 4) (APP-178) shows that an Adverse Effect on Integrity (AEol) of Lesser Black Backed Gulls (LBBG) from Alde-Ore Estuary Special Protection Area (AOE SPA) cannot be ruled out as a result of collision risk of North Falls in combination with other offshore wind farms. Accordingly, the Applicant is preparing compensation proposals for LBBG, as set out in the Habitats Regulations Assessment Appendix 2 Lesser Black-backed Gull Compensation Document (Ref:7.2.2, dated February 2025) (REP1-017) and the Habitats Regulations Assessment Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (Ref:7.2.2.1, dated February 2025) (REP1-020).

The National Trust defer the matters of quantification of effect, and scale of compensation required for LBBG to Natural England and the RSPB, given their ornithological expertise. However, since the submission of our Relevant Representation, the National Trust has continued to have positive discussions with the applicant about delivering compensation for LBBG on land that we own at Lantern Marshes on Orford Ness. These discussions are ongoing, and we will update the Examining Authority at a future deadline.

The National Trust notes that the land at Lantern Marshes is not included in the Order Limits for the DCO application, and therefore the Applicant would pursue an agreement outside of the DCO process. We have no objection to proceeding in this way.

Since submitting our Relevant Representation, we have also become aware that North Falls are progressing a 'without prejudice' compensation proposal for Auks (Guillemots and Razorbills from the Flamborough and Filey Coast Special Protection Area (FFC SPA) and that the list of potential compensation sites includes National Trust owned land in the southwest of England.

These sites are set out in the Habitats Regulations Assessment Annex 5A Outline Guillemot and Razorbill Implementation and Monitoring Plan (Document Ref: 7.2.5.1, dated February 2025) (REP1-029). The sites owned by the National Trust are:

- Cow and Calf
- Gull Rock (Falmouth)
- Highveer Point
- North Cliffs 1
- Rillage Point to Ramsay Beach
- St Agnes Head to Newdowns Head
- Wringapeak

As with Lantern Marshes, these sites are not included in the Order Limits for the DCO application.

The Trust has had initial discussions with the Applicant about these sites, including their suitability. However, we have not seen any baseline survey work, including breeding and disturbance surveys. Any decline in species at these sites has not been quantified. Furthermore, we consider that some sites are not suitable for the delivery of compensation measures due to the steep cliffs and being inaccessible.

The proposed compensation measures set out in the abovementioned document focus on recreational disturbance. However, there is currently no evidence to demonstrate that recreational disturbance is a key factor in the decline of Guillemots and Razorbills in this area. There may be other factors at play, such as food availability, predation and extreme weather events. Therefore, we are not convinced at this stage that the suggested measures to reduce recreational disturbance are appropriate or adequate to address the problem.

We will update our position on the above matters as the examination progresses, at appropriate deadlines.