

This submission seeks to provide an update to the Examining Authority on the National Trust's position in respect of Lantern Marshes at Orford Ness, which is one of the Lesser Black Backed Gull (LBBG) compensation sites proposed by North Falls.

The Trust is aware that a 4ha LBBG compensation scheme on Lantern Marsh has been included within the 'Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan' (REP6-013), in accordance with advice from Natural England. The Examining Authority will be aware that the Trust's position has always been that we believe a larger area than the 4ha scheme proposed would be required to ensure the long-term success of the scheme, as set out in our response to the first round of Examiners Questions (REP2-051) and our draft Statement of Common Ground with North Falls (REP3-051). We do not consider that a site of 4 ha would be in the conservation interests of the site or species and would not align with our ambitions for the site.

As an organisation, the National Trust is currently transitioning into a new 10-year Strategy called 'People and Nature Thriving' and also reviewing its position on project-based compensation schemes. The Trust is committing a significant amount of resource to major infrastructure projects at pre application, examination, and post consent stage, using limited charitable funds. Given that provisions for a Marine Recovery Fund (MRF) are now advancing, it is felt that the organisation should be looking to focus on securing delivery partner status for MRF schemes, rather than enabling project-based proposals.

It is considered that the MRF has the potential to deliver better outcomes for nature which would align with our new strategy. We have responded to the MRF consultation and are supportive of its establishment, recognising that done well, the MRF has the potential to improve the delivery of compensation, focussing on areas where the greatest benefits will be felt and at an appropriate scale and pace. We would hope that this new compensation mechanism can be put in place swiftly to support the drive towards net zero and decarbonisation, while ensuring the natural environment is protected, and where possible enhanced.

We also note that North Falls are keeping the MRF option open and that if this measure is selected, it would wholly or partly replace a project led measure. It is unclear at what stage that decision would be made.

We acknowledge that the DCO process provides the opportunity to progress with compensation schemes post consent and subject to subsequent approval from the Secretary of State. We have engaged positively in discussions with North Falls for approximately a year now and consider that the compensation proposals are not at an advanced enough stage to provide comfort to the Trust that an appropriate scheme will be delivered at Lantern Marshes in order for us to be able to commit further resource. There is still a significant amount of work to be undertaken in terms of site selection, survey work, design, land agreements, future management etc.

We are grateful to North Falls for the opportunity to try and work together to deliver a meaningful seabird recovery scheme, but for the reasons set out above, the Trust has taken the decision to step back from project specific discussions about compensation proposals at Orford Ness. We have made North Falls aware of this. We understand that they are actively pursuing discussions with other landowners and have therefore suggested that they focus on pursuing the alternative options available to deliver compensation for Lesser Black Backed Gulls.

Should opportunities arise through the MRF, we would be happy to engage positively with the applicant and other developers as we are keen to support the development of renewable energy projects and can see there may be the potential to deliver benefits for nature.