



Interested Party ID: 20025904

The Sizewell C Project

EN010012

NNB Generation Co (SZC) Ltd

SUMMARY OF WRITTEN REPRESENTATION:

Sizewell C Company's claims for Biodiversity Net Gain

Rachel Fulcher, BA(Hons), MPhil

Coordinator

s.coastalfoe@yahoo.co.uk

Sizewell C Co's claims for net gain in biodiversity units has increased consistently over recent years, from 10% to 19%. This paper, along with Dominic Woodfield's expert report and answer to ExA's question (Bio.1.33) at Deadline 2, sets out why, in our view, such claims are completely unrealistic and why the tool used, namely Defra's Metric 2.0, is flawed.

An essential component of the Metric is to 'limit damage to nature in the first place and help it thrive' by following the Mitigation Hierarchy, whereby Avoidance is the first step. Yet Sizewell C Co have done nothing in their plans to avoid driving an access road across Suffolk Coast & Heaths Area of Outstanding Natural Beauty and across Sizewell Marshes SSSI, nor to avoid felling two complete woodlands, nor to avoid building on highly valued County Wildlife Sites, nor on the habitats of protected wildlife such as reptiles. Rather, the Metric seems to have been used to justify so much devastation.

We are expected to trust that Sizewell C Co will carry out the mitigation plans as proposed and that new habitat creations will be carefully monitored and managed in the long-term. So far, the company has not demonstrated to us that they will do this satisfactorily. Rather, our photographs, taken last summer, show the poor condition of Kenton Hills, St James' Covert and Aldhurst Farm, all of which became badly overgrown (see Appendices of main Written Representation). Yet these are some of the habitats for which high-value units are claimed.

Although an Environmental Trust Fund has been promised to pay for the ongoing maintenance, we wonder how the money can be found, bearing in mind the very serious financial situation in which EDF finds itself.

Statistically, habitat creations have a very low success rate, at only between 26 - 46%, especially those led by developers as opposed to conservationists. Those proposed by the Applicant, therefore, are more likely to fail than succeed. This gives us little confidence that they will thrive as expected and offer the biodiversity net gain as claimed.

Sizewell C Co has had to resort to including the reptile translocation sites in their calculations for gains, yet Natural England has made it clear to us that such gains should be 'additional' to any compensation sites. This is supported by CIRIA et al's 'Good Practice Principles'. If units for these sites are subtracted, claims for the Main Development Site would fall into biodiversity losses.

The new roads would all cause chronic damage to the environment, not just in terms of the inevitable roadkill, but because of fragmentation, barrier effect, noise and pollution. Peer-

reviewed research confirms a loss of wildlife populations of up to 30% either side of any road with moderate use. It is incomprehensible that BNG should be claimed for the two bypasses and roundabout. The remaining arc of the bypasses between the old and new roads is too small for thriving wildlife populations. Fauna are unable to disperse and find mates, resulting in in-breeding, weakening of the colony and eventual collapse. No such effects are taken into account in the company's calculations.

The loss of so much woodland is particularly regrettable. While new planting is promised, saplings are likely to suffer from drought due to climate change. It is anticipated that many will not survive. To claim in the Metric that these will be in 'good' condition is completely unrealistic.

We conclude that Sizewell C Co's claims for 19% net gain is seriously misleading and that overall losses are more than likely.

Rachel Fulcher
31 May 2021.