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(Sizewell C Case Team)
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Our Ref: DW/2031/DL7-030921

Dear Sizewell C Case Team

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project (PINS ref: EN010012)

Deadline 7 submission by Dominic Woodfield (IP reference: 20025964)

I was unable to attend ISH10 due to annual leave commitments, but I have read the transcripts and noted the matters discussed. I have also noted the Deadline 5 and Deadline 6 submissions from the Applicant and reviewed these for any responses to the questions and issues directed at them via my oral and written submissions to ISH7 (as set out at [REP5-196](#)). To the extent that certain of these matters are raised again below, that is because the Applicant has declined to provide any answer or response to them.

As previously, my comments are focused on the Applicant's claim that the Project will deliver 'net gain' in biodiversity as that is the matter I was originally asked by FoE (Suffolk Coastal) to consider and contribute on. For the avoidance of doubt, I support the position of FoE (SC), the RSPB, SWT and others - a position consistent with formal guidance - that a claim of 'net gain' for the project cannot and should not be being made in a situation where losses of irreplaceable habitats will occur, and I share those parties' concerns about the Applicant's continued and persistent references to purported delivery of net gain in publicity material.

On the matter of the Applicant's proposed compensation for loss of irreplaceable SSSI habitats, I refer the ExA back to my written representations at Deadline 2 ([REP2-226](#) & [REP2-227](#)), and my oral and written representations at ISH7 and Deadline 6 ([REP5-196](#)) discussing how a simple calibration exercise reveals the Applicant's compensation proposals to be substantially short of adequate in quantitative terms, even before one gets onto matters of practicality and achievability of the stated ambitions to recreate equivalent-value M22 habitats on such land. I note that the Applicant has remained silent on the points I made in those submissions.

In relation to the biodiversity net gain (BNG) calculations for non-SSSI losses and gains, it would appear from the transcripts of ISH10 and the feedback I have received from that session from other Interested Parties, that the Applicant's position is that they do not intend to use the newer Metric 3.0 for BNG calculations. I understand the ExA (representing the consenting authority) also does not appear to be requiring that they use Metric 3.0 due to the existence of a Metric 2.0 calculation. I need say no more on this at this stage other than as this opportunity to require the Applicant to submit transparent calculations to the Examination has not been pursued, we default back to the

situation that has prevailed throughout the Examination – one where we still do not have the Applicant’s spreadsheet calculations before the Examination.

In lieu of the Applicant responding positively to the repeated requests for transparency and disclosure of its Metric 2.0 calculations, I enclose with this submission a spreadsheet of Metric 2.0 calculations for the Main Development Site (MDS) completed as best as permissible using the information in the Applicants’ information and BNG submissions (principally the BNG assessment version 2.0 - [REP1-004](#)).

The first thing the ExA will note is that it has not been possible to precisely replicate the Applicants output figure. This is for the reasons previously articulated in the written and oral submissions referenced above and as echoed by other Interested Parties. The exercise therefore confirms in the first instance that, despite the Applicant’s repeated claims (including orally again by Mr Lewis at ISH10¹), it is not in fact possible to reconstruct a working version of their metric calculations from the maps and other information they have submitted to the Application on this issue. The ExA is asked to note this point.

The ExA is also asked to note that to the extent that my submission of this spreadsheet may be perceived as introducing further competing and (on the face of it) complex evidence late in the Examination, this is a situation that could have been readily averted had a) the Applicant submitted a working version of their 2.0 Metric spreadsheet (either when first asked in July 2020 or in response to any of the many repeated requests since) and/or; b) had the ExA directed them to do so when I appealed for their intervention to make this happen.

The primary reason for submitting an independently populated version of the 2.0 Metric now is in order to better illustrate points that have been made previously by myself and others, but which have not been adequately responded to or addressed by the Applicant or otherwise resolved in the course of the Examination to date. Principally, it allows the widely held concerns about artificial suppression of baseline conditions on the MDS and artificial inflation of the success of future compensatory habitat creation to be illustrated by way of a few simple examples.

The attached Metric 2.0 calculation output, using the Applicant’s inputs, is 17.5% BNG (see ‘Headline Results’ tab). There are various reasons why, despite using apparently the same inputs, this headline figure may differ from the Applicant’s claimed 18.03% for the MDS, but the figure is close enough for illustrative purposes and the best that Bioscan were able to achieve with the information supplied by the Applicant (underlining why their spreadsheet is required for a proper understanding).

The Examining Authority is asked to spend five minutes with this spreadsheet noting the following:

- 1) The suppressed condition of **all** habitats in the baseline state (tab A-1, column H). No baseline habitat across the entire area of the MDS (other than vegetated shingle) is currently assessed to be in better than 'moderate' condition. What this implies about the extant and past management of the Sizewell Estate is discussed at the foot of this letter. For now, the ExA is invited to experiment with adjusting the drop-down menu inputs for 'condition' in column H and observe the effect on the 'Total net % change' figure in the 'Headline Results' tab of even slightly more generous assessments of the condition of the various extant habitats. It will be seen how even a few modest adjustments cause the overall % change figure ('Headline Results' tab) to dwindle rapidly towards nothing and then move into the negative.
- 2) The contrasting and liberal use of 'good' and 'fairly good' condition that is applied by the Applicants to future habitats in the Habitat Creation tab A-2. Again, the ExA is invited to experiment with slight adjustments to the

¹ Recording of ISH10 Session 1 at 1h12mins30. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-006820-Sizewell%20C%20ISH10%20S1.html>

drop-down menu inputs from column G of this sheet, observing the effect on the overall % change output figure of slightly more conservative predictions of what is likely to be achieved in the future (perhaps having in mind the debate over the degree of success of heathland and acid grassland at Aldhurst Farm for which I note FOE (SC) are submitting further information at Deadline 7). Once again it can be seen how the net gain figure dwindles rapidly towards nothing and then into the negative with such apparently minor adjustments.

If the ExA considers the effect of both of the above exercises cumulatively (adjustments to both tab A-1 to reflect higher baseline scores and adjustments to tab A-2 to reflect more realistic future habitat condition scores) the effect will be seen to be compounded. This is before one comes on to consider concerns about the time lag before some compensatory habitats even begin to be created, concerns that have been articulated by Mr Paul Collins. By reference to column O in tab A-2 (Habitat Creation), even if one agrees with all of the 'default' timescales listed in these cells, for some of these habitats the starting point will be many years after loss, meaning an exaggerated level of biodiversity deficit in the short to mid-term.

In short, it would only take very few corrections of 'condition' assessment errors to wipe out the Applicant's claimed net gain figure. And the justification for such corrections is clear: take 'other coniferous woodland' (Tab A-1 row 27) for example. This appears to relate to the County Wildlife Site at Goose Hill, an open-structured plantation woodland with broad species-rich rides important for a range of scarce species. While a 'poor' condition categorisation might apply to a dense Sitka spruce plantation with a carpet of needles on otherwise bare ground under densely spaced-trees that blot out the light, is it right to apply such a categorisation to Goose Hill? Is this c.45.5ha site really all in 'poor' condition? If one disagrees that it is, and adjusts the condition up to merely 'moderate' (itself a conservative assessment²), this single intervention (or correction) drops the headline output result immediately by over 7 percentage points to just over 10% - i.e. almost cutting the claimed net gain figure in half. Any further such corrections to the baseline will further denude the output figure towards 0% and into net loss.

The Examining Authority is asked to note how the above demonstrates the fragility in the Applicant's BNG claims and their vulnerability to challenge once the supporting calculations are subject to independent scrutiny and examination. The ExA is also asked to contemplate whether this is the reason behind the Applicant's continued and obdurate refusal to supply those calculations.

Finally, the Examining authority is also asked to note the real-world implications of the Applicant's broad-brush low scores for the existing (baseline) habitats on the MDS. The implication that much of the existing Estate is in poor or fairly poor condition is either false, or it must reflect very poorly on EDFE's stewardship of this landholding and/or that of those they have appointed to the task. If these habitats have experienced a sudden deterioration as a recent phenomenon, then the speed of such deterioration must reflect deliberate active neglect or something worse. If it is not a recent phenomenon, then the question as to how and why management efforts over time have left the Estate habitats in such 'poor' or 'fairly poor' condition must be asked. Moreover, if the condition assessments the Applicant has attributed to the Estate's habitats are accurate, and thus a true reflection of the current state of these habitats (after years of management), what is the Applicant suggesting will change in order to suddenly accelerate retained and future habitats into 'good' and 'fairly good' condition post-development? If estate managers have been unable to achieve this to date, what confidence can be had that the Applicant will be able to preside over a step change in habitat condition in the future. What financial or other measures are being brought to bear to enable increased effort on achieving success?

In the (rather more likely) alternative - that this is no more than evidence of artificial 'dumbing down' of the baseline scores and artificial inflation of the future scores in order to make the BNG output work - the ExA is asked to contemplate what this implies about the credibility of the Applicant's claims in respect of BNG for the other ancillary

² In fact, there are significant areas of rides and margins with some denser understorey in parts that are clearly in at least moderate and arguably good condition for this habitat type.

elements of the project (for example the Two Villages Bypass), as well as its SSSI protection and compensation claims, and the claims around marsh harrier compensation, delivery of suitable habitats for protected species mitigation and indeed the conclusions on ecology generally in the EIA and HRA. The ExA is asked to note that this is precisely why the applicant's conduct and lack of transparency over the BNG calculations and claims is a matter of import to the Examination more generally.

Best regards



Dominic Woodfield CEcol CEnv MCIEEM
Director

Enc: Metric 2.0 spreadsheet populated with Applicant's figures