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Sent: 03 October 2021 12:38
To: SizewellC <sizewellc@planninginspectorate.gov.uk>
Cc: 'Alison Downes, Stop Sizewell C' [REDACTED]@stopsizewellc.org>; 'Dominic Woodfield' <[REDACTED]@bioscanuk.com>; Tom Langton <[REDACTED]@langtonuk.co.uk>; 'John Rea price' [REDACTED]@btinternet.com>
Subject: Biodiversity Net Gain

Dear Sizewell C Team,

Following the meeting with SZC Co representatives from AECOM and Arcadis on Tuesday 21st September, further analysis and efforts are on-going to assess the additional information provided by the applicant regarding their BNG Metric 2 assessment.

The attached paper gives some initial analysis based on that information which will be further refined, as indicated in the attached, in the coming days before Deadline 10.

Unfortunately, I will be unavailable until 14th October, the last day of the examination, so would ask that you accept this submission for consideration as I will be mainly unavailable from today.

A Statement of Common Ground has been entered into with the applicant which will potentially require one further round of review of some minor changes and I hope I will be able to achieve that during my time away. They will then submit that as appropriate for your review.

A transcript is available against the Teams video recording and could be posted as well if you feel it would be helpful. Minutes created from the meeting by the applicant is also available from Arcadis but did miss some vital conversation points about Metric 3. If you feel this would be helpful, Dominic Woodfield and Tom Langton have access to all three files.

Kind regards,

Cllr. Paul Collins
Theberton and Eastbridge Parish Council
Co-secretary Minsmere Levels Stakeholders Group
Chair, Stop Sizewell C

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**Additional Biodiversity Net Gain Representation on behalf of
Paul Collins, Theberton and Eastbridge Parish Council and Stop Sizewell C
(Assisted by Dominic Woodfield – Bioscan and Tom Langton)**

This submission follows discussion with the applicant on the Statement of Common Ground that has been entered into between Paul Collins and SZC Co. and in due course will be submitted by the applicant.

It details further investigations and assessments that have been undertaken by Paul Collins, Dominic Woodfield (Bioscan) and Tom Langton, both of whom assisted me at the BNG SoCG meeting with SZC Co.

This document follows up on Deadline 6 ([REP6-075](#)) and Deadline 7 ([REP7-241](#)) submissions and the exchange of assessments and supporting documents made available following the Teams meeting held on 21st September 2021 as well as new assessments made with that supporting material. It should be noted that Messrs. Woodfield and Langton are still investigating a number of matters to do with the veracity of the applicant's BNG claims, and (by extension) the veracity of the EIA claims and will be making their own submissions on these matters in due course and in any event prior to or at Deadline 10.

Review of BNG Claims

The following analysis is based on comparisons between [REP1-004](#), [REP6-075](#) and an assessment in BNG Metric 3 based on the actual figures and assessments taken from the original BNG Metric 2 spreadsheet used by the applicant to report to the ExA in [REP1-004](#).

A summary of the main site calculation results can be found in the summary chapter of [REP1-004](#) at an image 8.1.1.

One of the significant differences between Metric 2 and Metric 3 calculations is that you can enter values for delayed habitat creation and improvement into the Metric 3 spreadsheet and see the impact on the headline BNG figures within the assessment. This will allow the comparison of my assessment in [REP6-075](#) with the Metric 3 assessment, although there are differences in methodology and scope as I look at Associated Development sites and make comparisons across the full development and operating lifetime of SZC.

It should be noted that Metric 3 is the assessment tool going forward for Natural England and the one that will be part of the new Environment Bill which will undoubtedly be in force at the start of the SZC build, should the application be successful and approved by the Secretary of State. It is the Metric to be used for decision making for new projects (post-July 2021) although NE guidance does allow projects that have worked to Metric 2 to continue to use that system subject to the discretion of the decision maker. In any event, there is no argument that Metric 3 is an improvement on Metric 2 and the most up to date system of quantitatively assessing BNG.

In the user guide for Metric 3 Natural England state:

It has been shaped by the knowledge and experience gained across a variety of different sectors since the offset pilots and the launch, in 2019, of a beta test version, biodiversity metric 2.0 (Crosher et al., 2019)

Biodiversity is under threat, globally and at home. Habitats are being damaged or disappearing and species are declining. This is not just bad news for nature but also for our own health and well-being and that of future generations. Biodiversity and healthy habitats are vital for a well-functioning planet, but their value is often not taken into account in decision-making.

This metric has been designed for application to UK terrestrial and intertidal habitats. It can be applied at a range of scales from developments of a few houses or land management changes in individual fields to strategic allocations or entire land holdings.

and

Biodiversity metric 3.0 supports and reinforces the application of the mitigation hierarchy which is an important principle of ecological good practice. Applying the mitigation hierarchy

means aiming to retain habitats in situ and avoiding or minimising habitat damage so far as possible, before looking to enhance or recreate habitats.

I also understand that in both Metric 2 and Metric 3 the practice of applying the off-site gains solely to the on-site losses through the process of trading is accepted, although as an overall assessment it seems illogical to me that effectively you are reducing the off-site gains to zero and allowing the on-site to rise above zero, even though when taken as individual areas they have 128% increase and 26% reduction in BNG respectively.

It should be noted that the exchange of metric 2 spreadsheets following the meeting on 21st September was restricted to the Main Development Site only. The associated development sites were not included in that exchange. Further requests also had to be made to the applicant to obtain the area breakdowns for their input figures.

What follows below is a review of the assessments made in [REP1-004](#) with the outputs from the Metric 3 assessment.

Table 1 – The Applicant’s Biodiversity Net Gain Metric 2 outputs

On-site baseline	<i>Habitat units</i>	1244.45
	<i>Hedgerow units</i>	117.26
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	918.51
	<i>Hedgerow units</i>	117.96
	<i>River units</i>	0.00
Off-site baseline	<i>Habitat units</i>	429.99
	<i>Hedgerow units</i>	18.99
	<i>River units</i>	0.00
Off-site post-intervention (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	980.27
	<i>Hedgerow units</i>	18.46
	<i>River units</i>	0.00
Total net unit change (including all on-site & off-site habitat retention/creation)	<i>Habitat units</i>	224.33
	<i>Hedgerow units</i>	0.18
	<i>River units</i>	0.00
Total net % change (including all on-site & off-site habitat creation + retained habitats)	<i>Habitat units</i>	18.03%
	<i>Hedgerow units</i>	0.16%
	<i>River units</i>	0.00%

We should note that the above has no accounting for the 12-year delay in restoring the MDS on-site areas and so is a simple before and after, completely ignoring the intermediate damage for 12 years

Table 2 - Biodiversity Net Gain Metric 3 (12 years delay assessed)

On-site baseline	<i>Habitat units</i>	1244.75
	<i>Hedgerow units</i>	119.74
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	735.46
	<i>Hedgerow units</i>	162.08
	<i>River units</i>	0.00
On-site net % change (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	-40.91%
	<i>Hedgerow units</i>	35.36%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	429.96
	<i>Hedgerow units</i>	24.98
	<i>River units</i>	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	982.17
	<i>Hedgerow units</i>	24.93
	<i>River units</i>	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	42.93
	<i>Hedgerow units</i>	42.29
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	3.45%
	<i>Hedgerow units</i>	35.32%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary	

The impact of the 12-year delay in restoration of the MDS on-site area is clear and reduces the overall BNG to 3.45% compared to 18.03% in the submitted Metric 2 calculation and there is a warning about trading rules violation where some of the positive BNG areas are not of the same type as the areas lost and so this would need to be investigated further and potentially further compensation secured.

There are also some differences in the on-site post intervention scores compared to the original Metric 2 calculation that need to be investigated further.

What is apparent is that the values evidenced in this Metric 3 assessment are substantially lower than the values that I assessed in [REP6-075](#) and all things being equal, it would suggest that similar reductions might also be found in the other associated development sites. The fact is that the Park and Rides and Freight Management Facility have not been assessed at all and given the long periods that these sites will be significantly reduced in terms of biodiversity unit assessment, it all adds up to a significantly worse picture than the applicant is claiming in its application.

During two of the Issue Specific Hearings related to the submissions [REP6-075](#) and [REP7-241](#) the applicant has said that they “do not recognise the headline figures for biodiversity loss” for the MDS on-site area of 26% and for the shingle and dune habitats at 96%. During the meeting on 21st September, the belief is that implementation of the LEMP will be able to change these negative assessments into positives.

The applicant also confirmed, that although Arcadis has “looked at” the Metric 3 analysis, the applicant is sticking with the inferior Metric 2 analysis.

Both Metric 2 and Metric 3 recognise the difficulties in establishing these new or improved habitats and as a result assess them realistically. This is one reason why the Metric 2 (or Metric 3) trading ‘rules’ are not satisfied: a matter that the applicant has refused to engage with despite the ‘red flag’ automated warnings given by the calculator.

Whilst we would all encourage the applicant to exceed the expectations of these assessments, there is also a significant chance that the implementation of the LEMP will not have the expected effectiveness or even fail in some areas.

Indeed, given the fallback that is already agreed for fen meadow creation, which recognises the potential for failure, even though the applicant will attempt to create nine times more fen meadow than is lost, there is equal potential for underperformance in restoration of the MDS on-site area and in reaching the goals in the off-site areas.

Whatever the reality is 15-20 years down the line, the applicant needs to respect the assessment through Metric 2 and the criticisms and assessments of the impact of the times when all these sites will not be contributing to biodiversity.

The fact is, Metric 3 is part of an on-going improvement of the BNG tool and it will be this tool associated with the Environment Bill as well as the tool in force during the possible construction of Sizewell C, **I would therefore suggest that a full Metric 3 analysis be requested to properly inform the ExA.** After all, the applicant has all the base data, and it isn't a difficult exercise to produce the Metric 3 assessment from those inputs alongside more precise implementation delays etc. that Metric 3 can assess.

Next Steps

Having received the applicants Metric 2 spreadsheet, Dominic Woodfield from Bioscan was able to quickly produce an initial Metric 3 equivalent that resulted in the table shown above. This still needs some additional checking and there may be some adjustments needed to my blunt 12-year delay application for Table 2.

The best organisation to achieve that would be the applicant through Arcadis as they have all the information and detailed maps of the assessed areas (albeit these still have not been provided).

Now that we have been given some additional breakdown of the MDS areas associated with the Metric 2 assessment, Dominic Woodfield and Tom Langton have completed a site walk and assessment of a sample number of the areas to provide an independent view of the condition scores used within the Metric 2 assessment.

It is our intention that these will be fed into the Metric 3 spreadsheet and the results provided to the ExA before or at Deadline 10. I would encourage the ExA to review this additional information as it will be independent and provide an independent second view of the BNG assessment from the applicant and as it will be provided within Metric 3 will reflect better the overall impact of the project on what is a very sensitive environment.

Unfortunately, I will not be available between the 4th October and 14th October due to holidays. As a result, I will probably be unable to contribute further detail so I would ask that you take it as read that the efforts and submissions of my two collaborators have my full support and approval.

Details for the three ADS can be found at [REP5-090](#) section 4.1.1 (SLR), [REP5-091](#) section 4.1.1 (TVB) and [REP5-092](#) (Yoxford Roundabout) section 4.2.1. No evaluations are made of the two park and ride sites or freight management centre, so these are assumed to be restored to the same state as they were before the development began and thus make no significant contribution, positive or negative, to BNG. However, they do contribute to overall biodiversity loss for the time they are in operation and prior to restoration.