

Deadline10 - Final Summary of Objections of Theberton & Eastbridge Parish Council, Minsmere Levels Stakeholders Group, Stop Sizewell C and Paul Collins

Summary of Concerns and Objections

As a group of organisations and individuals, we are not, in principle, opposed to nuclear power. However, we have been brought to oppose Sizewell C as a result of years of insufficient information, unsatisfactory community engagement, obfuscation and hidden agendas (such as with the route of the SLR, and the reasons for destroying Coronation Wood) from the Applicant, and multiple cumulative impacts on our community and environment.

Based on the evidence presented by the Applicant in writing, to Examiners' questions, through Statements of Common Ground and verbally through the Issue Specific Hearings, we remain deeply concerned that the development of the Sizewell C twin reactor project exceeds the ability of the local and Suffolk wide terrestrial and marine environment to assimilate the development project and operational platform.

At this time the plans put forward threaten the long-term safety, environmental and commercial integrity of the area, its surroundings and present a negative legacy for nearby communities and businesses once development work has been completed.

The Applicant has been unable to specify a stable and clearly defined envelope for either the development or the operational parameters/plans that are essential for such a large, potentially damaging, and complex project. As a result, we believe that the current request for Development Consent Order approval should be refused.

Specifically

Transport

We continue to be concerned with the Early Years plans for use of the B1122 and the, so far, unclear impacts or otherwise of using the Sizewell Link Road (SLR) as a haul road to transfer somewhere in the region of 140,000 tonnes of backfill material from both the Two Villages Bypass and SLR ([REP5-284](#)) to the Main Development Site (MDS).

There are questions about when this can start, given the requirement to bridge the East Suffolk Line, its practicality and impact management for the final half mile between the

southern end of the SLR and MDS entrance, and how haul traffic will join the existing B1122.

We note the ExA's question (TT.3.1 [PD-049](#)) on this in the latest request for information and are still concerned regarding potential impacts on the HDV limits agreed by EDF.

We continue to be concerned about the fact, based on the Hinkley Point C (HPC) experience, that for the first two years of site development the Applicant expects at least one Abnormal Indivisible Load per day to traverse the B1122 ([REP2-054](#)) from the A12 to the MDS, and is not clear whether the development of the SLR will add to that total.

We are only too aware that HGV limits at HPC had to be increased and that the only impact was to EDF's finances as a monetary sanction was imposed but the impacted communities would have seen no real benefit from such a sanction. The same will be true for communities along the B1122.

Coastal Impacts

In the initial DCO application, the Applicant attempted to keep any consideration of the design of coastal defences out of the examination on the basis that

- The Office for Nuclear Regulation (ONR) would have a final say on the defence of the reactor platform and design of the hard and soft coastal defence.
- The Coastal Processes Monitoring and Mitigation Plan (CPMMP) would manage any impacts from the design and implementation of the defences

On the basis that the ONR are not experts on the behaviour and specifics of East Anglian coastal change, impacts associated with climate change, storm surges and Sizewell Dunwich Bank changes, we are pleased that the ExA has ensured that these plans, that are key to impacts across the coast locally, have been brought before the Examination for scrutiny.

It is with significant concern that we have seen four changes to design of the HCDF, SCDF and BLF during such a short time and questions remain about the precise location, relative to the natural coastal embayment across Sizewell, and depth of the HCDF toe, especially at the southern end close to the interface with the existing Sizewell B defences.

So far, the impact of the final shutdown of SZB on the shoreline across SZA, SZB, SZC and the CPMMP does not seem to have been considered in modelling for the SCDF which is the only protection afforded the HCDF ([REP8-280](#)).

Further questions and differences regarding geomorphology and impact on the coast remain with Mr. Nick Scarr ([REP9-040](#), [REP8-328](#), [REP8-248](#), [REP8-249](#) and others) and Mr. Bill Parker ([REP8-198](#), [REP8-199](#), [REP7-175](#) and others) where the Applicant and Cefas ([REP7-060](#)) seem to be questioning years of established geomorphological understanding of the East Anglian coast and of their own observational reports.

We are aware of the submissions, from both IPs, that will be submitted at Deadline10 and endorse their views.

We are also aware of the SoCG that will be submitted between the Applicant and Mr. Nick Scarr and endorse his views of lack of progress with the Applicant.

Environmental Impact

We have considerable concern regarding the negative impact on the AONB, Heritage Coast and designated sites at Minsmere, Sizewell and Dunwich both during development and operation.

We are aware of the submissions of Paul Collins ([REP6-075](#) and [REP9-044](#)) regarding Biodiversity Net Gain (BNG) and his SoCG discussions with the Applicant supported by Dominic Woodfield of Bioscan and Tom Langton.

The damage that will be inflicted on this highly interconnected and environmentally sensitive area is not just regrettable but is beyond acceptable given the recognition that we are not only in a climate crisis but also a Biodiversity crisis, something that is recognised in the upcoming Environment Bill.

The Applicant's claims of 19% Biodiversity Net Gain ([REP1-004](#)) are indefensible and do not account for massive losses of biodiversity during the development phase of the MDS and all the Associated Development sites including Park & Rides and the Freight Management facility.

We understand that the assessment of the Applicant's BNG metric 2 calculations submitted by Mr. Collins, when compared with BNG metric 3 calculations, are shown to be comparable, thus reinforcing that submission ([REP9-044](#)). Further submissions by Mr. Woodfield of Bioscan at Deadline10 reinforce the view that the Applicant's claims are erroneous and constitute exaggeration and by proclaiming them publicly an attempt at greenwash. We fully support Mr. Woodfield's submission and Mr. Collins' previous submissions on this subject.

The Applicant's statements in hearings that "they don't recognise" their own BNG assessments is a result of a reliance on actions through the LEMP negating poor BNG assessments in their calculations.

It is now apparent from metric 3 calculations that as far as the MDS is concerned, the assessment of 25% loss in Biodiversity is probably a significant underestimate with the true loss being closer to 40%.

The Applicant in relying upon above average performance for habitat creation and improvement against the LEMP plans is unrealistic as an overall strategy. There is an equal likelihood of failure of achieving LEMP objectives in both areas where BNG assessments are negative, due to the difficulty of establishing or improving habitats, as well as with less challenging habitats.

Whilst it is not required for the Applicant to have submitted a BNG assessment for an NSIP, it is also true that where any designated site is being developed upon (Sizewell Marsh SSSI), NE guidance says that BNG should not be claimed as such sites cannot be assessed via metric 2 or metric 3.

However, as a BNG assessment has been made and claimed we feel that there should be a modicum of agreement between what the EIA and BNG assessments and what the LEMP seeks to achieve.

Such a balance is achieved when considering the compensation efforts for Fen Meadow and M22 habitats with an NE-imposed 9-fold multiplier and fail-safe compensation package should the required quota not be achieved.

The fact that much of the development site is not assessed with such rigour does not mean that such insecurities of success are not present there as well.

Community Impacts

From the viewpoint of Theberton and Eastbridge Parish Council, we are pleased that our concerns over the closure of all of the north/south connections lanes south of the existing B1122 have been acknowledged and that Pretty Road from Theberton to Saxmundham has been left open with a connecting bridge across the SLR but remain concerned that this is the only direct connection that will be left open.

There remain several issues for which remedies have not been identified:

- B1122 mitigation through Theberton for the Early Years has still not been finalised in terms of a pedestrian crossing and whether a 20mph speed limit can be introduced from the proposed village gateway entry signs on the B1122.
- We have still not seen any improvement in the Property Price Support Scheme to bring it in line with the sort of scheme operating at Hinkley Point. There are further concerns that the scheme was removed from the Deed of Obligation at an early stage with East Suffolk Council's consent but without any consultation with the villages likely to be affected. Cllr. Graham Bickers is pursuing this issue separately and with our full support ([REP5-202](#), [REP5-203](#), [REP5 204](#), [REP5-205](#), [REP5-206](#) and [REP5-207](#)).
- There remain concerns on Noise and Pollution impacts in the Early Years as Theberton village residents will experience significantly increased traffic flow on the B1222 and contributions from SLR construction and unspecified haul road traffic on the developing SLR. These are assessed but not in combination.
- Noise and dust impacts in Eastbridge, as well as rat running through Minsmere, on what are single track roads without any speed limit, continue to be minimised by the Applicant as issues that will not be due to their own workforce even when the causation will probably be due to increased traffic due to the Applicant's development.
- Given the experience with light pollution at HPC, we are clear in our understanding that the night skies in Eastbridge ([REP7-292](#)) and the Minsmere valley will be severely compromised by the development for 10 to 12 years and are also concerned for the effects on wildlife in the area, quite apart from the environmental issues raised earlier in the summary, as this is not captured in either BNG metric 2 or metric 3 assessments.
- We remain appalled that the Applicant has determinedly resisted all your strong recommendations to provide visualisations (LI.2.1 [PD-035](#)) of the construction phase. Local communities have a right to know what is coming, and it seems clear that the Applicant's refusal to comply is directly related to a fear of stoking opposition, as opposed to being a considerate neighbour ([REP5-286](#)).
- We remain unconvinced with accommodation plans for the workers campus and caravan site, given the significant expansion of maximum workforce revealed after the size of these two sites had been fixed ([REP5-285](#)). We are already getting feedback about significant increases in rental values in Leiston, a problem that will only increase should SZC be approved. We are also unconvinced that East Suffolk Council's contentedness with the existing arrangements supplemented by various funds to increase bed space availability by increasing the number of Houses of Multiple Occupancy and other such efforts as spare room letting. We do not believe these mitigation's will be successful, despite the Applicant's confidence in comparisons with HPC and Bridgewater when

Bridgewater population is approximately nine times that in Leiston and thus has much greater capacity to absorb large influxes of temporary workers.

Water Requirements

It is astonishing that this issue is unresolved considering that East Anglia and Suffolk in particular is well known for being a significantly water stressed county. Indeed, as the operator of SZB, EDF and the Applicant must have been fully aware of the potential issues in supplying potable water at the volumes required for both development and operation.

This is particularly frustrating since IPs and consultees have been asking questions about water supply throughout the past 10 years and have been receiving “don’t worry” reassurances but with no specific plans.

Now that the issue has come home to roost, it seems that apart from a very late application for a desalination plant for development, all that is offered for operation is a dogged insistence that Northumbrian Water (NW) will have to ensure provision for commissioning and operation in 10-12 years’ time, despite the fact that the means are unidentified.

We fail to understand how the project could be allowed to proceed given that the source, cost, sustainability and environmental and community impacts of securing such a water supply are all unknown. Will we, as residents, be forced to accept a detrimental proposal, at any price, because “water must be found”?

It is equally galling that the entire issue of potable water provision, including potentially providing additional water main connection with associated pumping facilities purely for SZC, is not part of the DCO application and examination.

The Applicant seems to think that provision by NW is a right and that all costs for such provision will have to be rolled into the overall cost base for NW and, in part, passed on to its consumers.

This is an issue that should have been resolved during pre-application consultations and fully elaborated within the DCO application.

Unfortunately, this is a recurring theme within this project whether it be coastal defence or various strands of transport plans.

Finance

We consider it an outrage that the Applicant has refused to either update or share information during the examination about the cost of the project. It is abundantly clear that these costs will have risen given the multiple changes to the Applicant's proposals, including the need for a water desalination plant during construction, and the increase in the cost of building materials. It is also certain that Sizewell C will only go ahead if it receives taxpayers' money and a construction "tax" on energy bills via a RAB model to incentivise investors. The latter is likely to be highly controversial, therefore the cost of Sizewell C is a matter of major public interest. ([REP7-226](#), [REP2-449c](#), [REP2-449i](#), [REP2-449l](#), [REP2-449q](#) and [REP2-449t](#))

Conclusion

Whilst we are dismayed at the government's recently stated support for nuclear energy, this cannot be at any price. The Applicant may be correct in stating that Sizewell C is the only large-scale project close to construction, but this does not mean it is the right project, or that the multiple negative impacts that would result are justifiable.

We note with interest the French President's announcement today of support for the less impactful Small Modular Reactors which he described as "safer" and a way to "reduce waste". If nuclear is to be included in the future energy mix, surely new technologies rather than the enormous and damaging Sizewell C are the way to go. We urge you to recommend that the project be refused consent.

~~I apologise for the lack of examination library references in the above, but working from my iPhone in Spain has reduced my ability to add these at this time. I intend to resubmit this with references on 14th October, being my first day back at home and I hope you will be willing to accept a replacement submission at that time.~~

Cllr. Paul Collins
Theberton and Eastbridge Parish Council
And on behalf of
Minsmere Levels Stakeholders Group
Stop Sizewell C



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1 INTRODUCTION

1.1 Status of the SOCG

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for development consent under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project. This version, version 02, dated 24 August 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Mr Paul Collins, referred to as 'the parties'.

1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project') in relation to Biodiversity Net Gain (BNG). This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.2 The aim of this SoCG is, therefore, to inform the Examining Authority and provide a clear position on the state and extent of discussions and agreement between the parties on matters relating to the Biodiversity Net Gain assessment of the proposed Sizewell C Project.

1.2.3 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website.

1.3 Structure of this Statement of Common Ground

1.3.1 **Chapter 2** provides a schedule which detail the position on relevant matters between the parties, including any matters where discussions are ongoing. This is underpinned by Appendix A, which provides a summary of engagement undertaken to establish this SoCG.

2 POSITION OF THE PARTIES

2.1.1 **Table 2.1** provides an overview of the position of the parties and any further actions planned.

Table 2.1: Position of Parties

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
1	Transparency	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>The applicant states that the table shows an 18.03% increase in biodiversity. Try as I may, the only result I can get from this table is an increase of 13.4%.</p> <p>As the biodiversity difference claimed by the Applicant is for a 19% increase REP1-004, one can only assume that the overall figure must be less also.</p> <p>It's not actually possible to reference the locations to which the claims and assessments are related in that biodiversity net gain document. There are no maps of the various sites that are cross referenced into the tables for prior and post development assessments.</p> <p>A lack of complete location information provided by the applicant. Attempts have been made to reproduce the spreadsheet based on the information given in the above submission but simply cannot be successfully recreated.</p> <p>The original work by Arcadis has not been submitted, presumably where more detailed maps and relationships to physical settings within the development site have been elaborated. We request that this report along with the accompanying metric 2 assessment be provided as soon as possible to verify locations and the appropriate use of quality metrics which can very quickly turn an increase into a decrease of biodiversity units or vice versa.</p> <p>Post 21st September TEAMS meeting</p> <p>The metric 2 spreadsheet has been shared as well as some additional breakdown of the aggregated areas assessed for the MDS, both off-site and on-site areas.</p> <p>However, no map has been provided as initially requested so there are still some issues with accurate assessments being related to the metric 2 spreadsheet inputs and subsequent details sheets.</p> <p>From the meeting, it is clear that when I raise the issue of 26.2% loss in biodiversity in the MDS on-site area between pre-development assessments and post development assessment, the phrase "we don't recognise those figures" refers to the fact that despite their metric 2 assessments giving those figures they refer back to the LEMP as a means and justification that</p>	<p>SZC Co. has agreed to share the metric via email.</p> <p>It has not been possible to share the metric through the PDF based examination library.</p> <p>The targets set are aspirational, but achievable. The Landscape and Ecology Management Plan documentation details how these targets will be achieved.</p> <p>The targets will be tested and reviewed throughout the design and implementation period.</p>	<p>Paul Collins position: Not agreed.</p> <p>Whilst there has been a positive, if late, sharing of information, the basic premise of the 19% and it's underpinings is not accepted.</p> <p>The refusal by the applicant to recognise the details of their own BNG assessments on the basis that the LEMP will ensure successes not recognised by metric 2 will occur is unrealistic. It is unfortunate that spreadsheets cannot be shared through the examination library something that perhaps PINS should address.</p>

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
		<p>will ensure that the applicant will improve their implementation post development and the result will be better than the BNG metric might suggest.</p> <p>This comes back to a general tension between wanting to use the 19% Biodiversity Net Gain result as proof that their plan and management post development will be positive.</p> <p>The applicant is happy to laud the positives but unwilling to accept that within that assessment, there are also negative contributions.</p> <p>It is not logical or scientifically valid to accept all the positives and then to claim the negatives will not appear because the LEMP will ensure the applicant will do better in those areas.</p> <p>It is just as likely that in those areas and other more positively assessed areas, that the applicant will fail to meet the "target" assessments as habitat creation and improvement is not an exact or easy science.</p> <p>The applicant needs to accept this uncertainty and accept that metric 2, which undoubtedly has its faults - otherwise we would not be looking at metric 3 to be associated with the new Environment Bill - is still a tool that gives a reasonable assessment of impact and the difficulties of creating and improving habitats and the time that it might take to achieve such ends.</p> <p>As for as the 18.03% versus 13.4% for the MDS, it is now apparent that for metric 2 all the positive BNG associated with the off-site areas has been compared to the MDS on-site values only.</p> <p>Effectively this says that the off-site areas are not improved at all as all their BNG is applied only against the on-site area, where there is actually a 26.2% deficit.</p> <p>In fact what the metric 2 assessments says in detail is that in the off-site areas there is a 128% increase in biodiversity units compared to baseline and on-site a 26.2% decrease in biodiversity units compared to baseline. Because the on-site area is much larger, viewed as a single on-site plus off-site unit, the value is 13.4%.</p> <p>This is a criticism I would have of the way the metric 2 deals with interpretation of this overall assessment.</p>		

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
2	Assessment of Associated Development sites	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>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 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.</p> <p>Post 21st September TEAMS meeting</p> <p>My position stands. No calculations are given for these sites and optimistic statements from the applicant without any impact assessments are not acceptable. This item was not discussed in the meeting.</p>	<p>BNG calculations were carried out for sites with a permanent land use change. The sites with a temporary land use change will be returned to their baseline states. This is likely an underestimate of the level of biodiversity enhancements due to improved hedges and field margins.</p>	<p>Paul Collins position: Not agreed.</p>
3	Condition Assessment	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>Whilst the BNG calculations try to account for some of the difficulties in establishing the various habitat types, it is likely that the estimates will fall short of accounting for all the issues inherent in the different soil types and water regimes that are present on site</p> <p>Post 21st September TEAMS meeting</p> <p>Following provision of the additional information and the spreadsheet, Dominic Woodfield (Bioscan) and Tom Langton are in the process of assessing the MDS on-site and off-site areas and will provide an assessment prior to Deadline 10.</p> <p>Conversations regarding particular areas, such as the non-native conifer plantation on Goose Hill as being in the lowest category of condition, putting it into the same category as a dense commercial forestry plantation with no understory and just a bed of pine-needles, raises concern that some unrealistic assessments have been made. Until the walk through assessment is completed, this criticism stands and the results of that assessments will be made available to the ExA prior to Deadline 10.</p>	<p>SZC Co. strongly confirms that there is no artificial suppression, inflation or bias in the BNG work.</p>	<p>Paul Collins position: Not agreed</p> <p>Further assessments will be made available by Dominic Woodfield of Bioscan once a walking assessment of the MDS on-site and off-site areas has been made.</p>
4	Main Development Site Score	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>After the project is complete this Main Site area is subject to a permanent 26.2% loss of biodiversity which can only be considered as catastrophic for the long term integrity of this unique habitat as this is effectively the connectivity corridor of</p>	<p>SZC Co. have followed the guidance and used the metric for the calculations, in line with how Natural England calculates biodiversity.</p> <p>The presented 18% figure is a net value, this does include the biodiversity improvements to be made to the wider Estate. In the</p>	<p>Paul Collins position: Not agreed.</p>

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
		<p>the AONB and these interlinked habitats. Supports RSPB statements on BNG.</p> <p>Post 21st September TEAMS meeting</p> <p>I refer back to the points I made in item 1 above. The interpretation of the 18% figure will mean that the off-site areas have no BNG, i.e.0%, as the 128% gain associated with the off-site areas are all referred across to the on-site area.</p> <p>Whilst it is true that there will be no ecological barriers between the on-site and off-site areas at the end of the project, the fact is that all the positive BNG improvements have occurred in the off-site fields and the main development site has a 26% BNG reduction. That is what the individual elements of the metric 2 results say, no matter how Natural England guidelines interpret the overall results.</p> <p>Scientifically and statistically, the NE overall assessment guideline makes no sense.</p>	<p>long-term there will be no ecological barriers or differentiation between the land within the Order Limits and the wider Estate. SZC Co. have followed the guidance and used the metric for the calculations, in line with how Natural England calculates biodiversity.</p>	
5	BNG assessment not reflective of other assessments	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>The Applicant's claims of BNG are spurious, arithmetically wrong and wilfully ignore the overall impact on biodiversity.</p> <p>Post 21st September TEAMS meeting</p> <p>The criticism above has nothing to do with the CIEEM impact assessment. It is focussed solely on the interpretation and assessment of BNG.</p> <p>Having said that, whilst the two assessments would not expect to end up in exactly the same position, you would expect there to be some correlation between the two.</p> <p>But back to the criticism here, the overall impact on biodiversity is not properly assessed as the intervening 12 years on the main site, when biodiversity will be close to zero, is simply not assessed at all.</p> <p>It is true that the metric 2 assessment does not take this delayed implementation of the post development habitat restoration and creation into account.</p> <p>For the applicant to ignore this loss into it's interpretation and overall assessment of BNG is simply a dereliction of responsibility to create a balanced assessment by hiding behind guidance on metric 2 which never anticipated the situation that the SZC development entails.</p>	<p>SZC Co. have followed Natural England evaluation for the BNG assessment and the CIEEM impact assessment. BNG is not an impact assessment tool.</p>	<p>Paul Collins position: Not agreed.</p>

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
6	Existing habitat creation	<p>Deadline 6 (REP6-075) and Deadline 7 (REP7-241) submissions</p> <p>It's also the case that much of the already created habitat is of low quality, and evidence of appropriate management is not there. Some of the things that are being done, particularly on Aldhurst Farm, are not really being done to create the sort of lowland heath habitat or acid grassland that they're wanting, it's just turning into low quality, grassland and nothing else. And in fact, recent topping of the entire area, because it was full of ragwort won't have done anything good. In fact, it probably will have destroyed some of the heather brashings and other plant life that actually was being put on there.</p> <p>The assumption being that the retained habitats will be vastly improved in the future.</p> <p>Post 21st September TEAMS meeting</p> <p>Insufficient nutrient depletion strategies have been applied to a number of the fields that have been taken out of arable production and put into programmes to create acid grassland and lowland heath habitat. Whilst these may be successful in the longer term, the impact of not following good practise in these efforts will be missing the target dates for habitat quality, reflected in the BNG assessments and thus further challenge what is already a questionable assessment and claim for BNG.</p>	<p>Habitats which are already established have existing management plans and will be further managed to increase quality and distinctiveness e.g. heather establishment which creates more heathland habitat.</p> <p>Much of the habitats created already are in the transitional period, where they're being turned from an arable field into a semi natural habitat. The process to reach target conditions is ongoing.</p>	Paul Collins position: Not agreed.
7	CWS Vegetated Shingle and Dune Habitat	<p>Deadline 7 (REP7-241) submissions</p> <p>When you start looking at the profile of the soft coastal defence, which starts at 6.4 metres high and then then grades down to the mean high water springs tidemark, it's going to be a very different environment than that which is currently in place. Currently, this is where a lot of this vegetated shingle habitat is. If you also then start to look at the applicant's biodiversity net gain for the two areas of shingle habitat and also the dune habitat. There's a 94% loss in their biodiversity measurement between what is exists now and what will be there 20 years after the new habitat is put in place.</p> <p>Post 21st September TEAMS meeting</p> <p>This item was raised at the same time as the biodiversity loss for the MDS on-site area. Comments made in sections 1 and 4 above apply equally here.</p>		Paul Collins position: Not agreed.

Ref.	Matter	Mr P. Collins's position	SZC Co.'s Position	Position of the Parties
8	Metric 2 and Metric 3 assessments	<p>Post 21st September TEAMS meeting</p> <p>It was stressed on two occasions that a BNG Metric 2 assessment is not required for National Strategic Infrastructure Projects. I pointed out that having submitted such an assessment, it is only right that we assess the validity and veracity of the assessment, especially as it is being used in communications material regarding the development.</p> <p>I think it is also the case that where a developer develops on designated habitat, that no Biodiversity Net Gain can be claimed as the designated habitat cannot be assessed under Metric 2. The fact that over 10 hectares of SSSI habitat will be lost in the development, would also indicate that these claims, whilst being helpful in terms of assessing the project, are in fact outside of the guidance for BNG assessment claims.</p> <p>Discussions during the meeting confirmed that Arcadis have looked at metric 3 assessment although it was stated on behalf of the applicant that they would not be using metric 3 and that originally RSPB/SWT had been of the same opinion. However it was also noted that RSPB/SWT's position seemed to have changed at Deadline 7.</p> <p>Metric 3 can deal with the delayed implementation of habitat restoration and creation, so would it not make more sense to show the impact of the delay through Metric 3 which has grown out of the Metric 2 assessment?</p>		Paul Collins Position: TBD once SZC's position is known.

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, as are summarised in **Table A.1**.

Table A.1: SOCG meetings held between the parties

Date	Details of the Meeting
Tuesday 21st September 2021	Teams meeting held to discuss the Biodiversity Net Gain Assessment submitted to examination [REP1-004].



APPENDIX B: ENGAGEMENT TO DATE ON BNG

Response to RSBP on BNG [[REP5-120](#)]: located on e-page 1288

Audio file

New Recording 3.m4a

Transcript

The initial part of the transcript as people joined the meeting has been removed but is available if required.

00:05:01 AL (AECOM) for the Applicant

The meeting is obviously on biodiversity net gain or do introductions very soon. Just gonna say a little bit about ground rules. Really we are gonna come, not focused, but entirely covered by the person that games today. We don't want to drift onto into other areas.

00:05:17 AL (AECOM) for the Applicant

That's not the purpose of the meeting. The purpose of the meeting is because we're directed by the examining authority to hold this meeting to try and come up with a statement. The common ground not might be more of a statement on common ground.

00:05:30 AL (AECOM) for the Applicant

Let's see if we can agree on some things and present that to the examining authority. And obviously that's the that's the ambition for today.

00:05:38 AL (AECOM) for the Applicant

To see what we can agree and document those things we don't agree and put that note in front of an examination.

00:05:47 AL (AECOM) for the Applicant

Introductions, obviously. Alan Lewis technically for ecology on Sizewell C uh, my work for ACON, but I'm embedded within the Sizewell C team and from our side Martina would you like to take everybody through the Arcadia team?

00:06:05 MG (Arcadis) for the Applicant

Sure, I'm they've been for the last couple of years the project. Director of the Ecology services on site well and on the BNG and. Liam you want to introduce yourself.

00:06:19 LP (Arcadis) for the Applicant

Stan had come, uh, you know, a lot of involvement in the PNG and through my work with sides well and had a lot of experience.

00:06:30 LP (Arcadis) for the Applicant

With other products as well.

00:06:34 E (Arcadis) for the Applicant

Hi, I'm Emily. I'm a graduate. Psychologists are killers and I've been doing a lot of work on files well this year and I'm going.

00:06:41 E (Arcadis) for the Applicant

To be taking.

00:06:42 E (Arcadis) for the Applicant

The Minutes for today.

00:06:44 MG (Arcadis) for the Applicant

And there is a transcription as well. We should point out, and, uh, so that will be helpful. I guess Emily.

00:06:52 LP (Arcadis) for the Applicant

See how well it works.

00:06:54 Paul Collins

Well, if it's if it's if it's anything like the one that they use on the on on the hearings, it could be hilarious at times. That's all I'll say.

00:07:04 Paul Collins

Well, it's OK, but.

00:07:09 Paul Collins

At least at least you get something you can go back and look at and then then go and listen to what was actually said.

00:07:16 AL (AECOM) for the Applicant

Exactly exactly, but it.

00:07:17 AL (AECOM) for the Applicant

Gives you the gist of what was said. Also wanted both go through from from your side.

00:07:22 Paul Collins

Yeah, OK, so Paul Collins. I'm well, I'm I'm the chair of stop signs we'll see, but I'm a counsellor for Fenton Eastbridge Parish council and their lead.

00:07:32 Paul Collins

Uh, person on on the Sizewell and energy projects in general, so we have a few others that we have to.

00:07:39 Paul Collins

Deal with and also. I'm a Co secretary for Minsmere level Stakeholder group, which looks after the coastal areas and hinterland in the bins near Valley, along with people like minzer like the RSPB and others so.

00:07:55 Paul Collins

And perhaps dominate you introduce yourself.

00:07:58 DW for Bioscan

Hi, yes DW, director of Bioscan, UK ecological consultants.

00:08:03 DW for Bioscan

Uhm, pulled into this by friends of the Earth Suffolk coastal primarily to look at the biodiversity net gain matter because I have long experience of the system and its application. If there's.

00:08:18 DW for Bioscan

In the background noise, I apologise, my son tested positive for COVID yesterday were all stuck at home and it's obviously rattling through the school.

00:08:27 DW for Bioscan

So yeah, I will. I will use the mute button when I.

00:08:30 MG (Arcadis) for the Applicant

Need to well, I hope he's not too bad.

00:08:33 MG (Arcadis) for the Applicant

Not sure bro.

00:08:33 DW for Bioscan

He's got thank you for asking, but he's got absolutely no.

00:08:37 DW for Bioscan

Symptoms at all.

00:08:40 MG (Arcadis) for the Applicant

Have you have you confined him to his room though?

00:08:42 MG (Arcadis) for the Applicant

So you don't.

00:08:42 MG (Arcadis) for the Applicant

Get it or what? What are you doing?

00:08:43 DW for Bioscan

Well, we're just we're.

00:08:44 DW for Bioscan

Just keeping all the doors open, hence me being in the garden. And it's yeah it's a it's. It's a bit of a tricky when he's 10 years old.

00:08:52 DW for Bioscan

So trying to get that.

00:08:54 DW for Bioscan

Not really.

00:08:57 DW for Bioscan

Thank you very much.

00:09:01 TL

Hello I'm Tom Langton. I live locally in Broomfield which is within the Six Mile danger or destruction zone? I'm not quite sure to call up UM ecologist and I lived here 30 years so I know the area very well. It's my patch. I've been giving advice to Suffolk Coastal Friends of the Earth, but also independently making my own submissions. As you may be aware particularly concerned about the quality of outputs from and mitigation and I got heavily embroiled in the destruction of Coronation Woods. Some of you may be aware of that but generally I mean reptile and amphibian specialists back to India.

00:09:52 TL

Uh, or or?

00:09:54 TL

Whatever it was, uhm, back into foul early 2000s about natterjack toad and the potential for heath and restoration. Uh, so I've got a long legacy, in terms of taking interest in the site. Also, the pleasure of being banned from the land at EDF in relation to wanting to do invertebrates and amphibian reptile surveys. That's me.

00:10:27 AL (AECOM) for the Applicant

Thanks, Tom. What we've done. We obviously haven't got a formal agenda, Paul, but what we did yesterday and Liam thank you for and thank you for your email yesterday which provided those links to all your reps and what Liam did yesterday was work his way through.

00:10:42 AL (AECOM) for the Applicant

The BNG matters raised in those reps and we were just gonna work through those Liam. I think that's probably the best way and obviously that will stimulate discussion as we move through. So, do you wanna start off with the first issue, Liam, you picked up.

00:10:55 LP (Arcadis) for the Applicant

I wonder if someone else wouldn't mind sharing this screen so I can have this open and I can have my notes open, that sort of thing, but I'm trying to share everything at once that location.

00:11:04 AL (AECOM) for the Applicant

Yeah, what's wrong?

00:11:05 AL (AECOM) for the Applicant

Far have you gotten one of your team so many agenda or something?

00:11:09 LP (Arcadis) for the Applicant

People don't get ever.

00:11:11 E (Arcadis) for the Applicant

Yes, I do one second.

00:11:13 AL (AECOM) for the Applicant

Only shows her screen, then that'll at least have to be something to talk to.

00:11:17 E (Arcadis) for the Applicant

Alright, can you see that so this pairing?

00:11:21 Paul Collins

Bigger would be good.

00:11:24

Hey man.

00:11:43 E (Arcadis) for the Applicant

Everyone see the the this legenda live in Scotland.

00:11:49 MG (Arcadis) for the Applicant

Yes, thanks Emily.

00:11:50

Is there anything?

00:11:51 TL

Yeah, you can just enlarge it just fine.

00:11:57 MG (Arcadis) for the Applicant

A tip for anyone going forward on the meeting if they want to zoom in in something you can.

00:12:01 MG (Arcadis) for the Applicant

Actually do that.

00:12:02 MG (Arcadis) for the Applicant

You've got control.

00:12:02 MG (Arcadis) for the Applicant

Over zoom on your mouse if you have a little wheel on your mouse that works, you can zoom in and out as well. Just if we are looking at any details or anything.

00:12:12 AL (AECOM) for the Applicant

OK thanks. Well apologies Martin if I skipped.

00:12:14 AL (AECOM) for the Applicant

Over the the the the.

00:12:16 AL (AECOM) for the Applicant

The the the piece on the.

00:12:17 AL (AECOM) for the Applicant

Uhm, culture of caring is is that an Arcadis? UM introduction in terms of your default and meeting agenda or meeting structure?

00:12:25 Paul Collins

I can't seem to do anything with it.

00:12:28 MG (Arcadis) for the Applicant

I don't. I think it probably is.

00:12:30

I mean.

00:12:32 E (Arcadis) for the Applicant

Yeah I did.

00:12:33 E (Arcadis) for the Applicant

The reminder basically just a reminder of.

00:12:37 E (Arcadis) for the Applicant

You know the umbrella values and how we work together.

00:12:40 E (Arcadis) for the Applicant

So obviously like leadership.

00:12:42 E (Arcadis) for the Applicant

And stuff like that and then working together so we can get the best positive outcome. Uhm.

00:12:47 E (Arcadis) for the Applicant

That would basically just.

00:12:48 E (Arcadis) for the Applicant

A little little reminder.

00:12:49 E (Arcadis) for the Applicant

Just why I put that there.

00:12:50 MG (Arcadis) for the Applicant

That's a lovely thought. And and it's.

00:12:52 AL (AECOM) for the Applicant

A it's a lovely thought that and I think the examining authority are keen for us to work together to at least define where we.

00:13:00 AL (AECOM) for the Applicant

Agree and define where we disagree and that will help the examining authority. So I think that's right, even though.

00:13:06 AL (AECOM) for the Applicant

I'm probably not a team as in as in the sense of the team, but in terms of working towards something the examining authority wants.

00:13:13 AL (AECOM) for the Applicant

I think that is a central point.

00:13:15 DW for Bioscan

We're effectively required to under the enquiries Procedure Regulations so.

00:13:19 AL (AECOM) for the Applicant

It's actually exactly right.

00:13:21 AL (AECOM) for the Applicant

We were duty bound.

00:13:22 AL (AECOM) for the Applicant

To to do that, or for the panel.

00:13:26 AL (AECOM) for the Applicant

So you know.

00:13:29 AL (AECOM) for the Applicant

Sorry all, I was gonna say so I I presume in in relation to the submissions there on the Ice Age 7 summary, you've got that open in front of you.

00:13:37 AL (AECOM) for the Applicant

And we can work through that, and then we'll come onto the the other later bullet points under the submissions, yeah?

00:13:43 LP (Arcadis) for the Applicant

Yes, I've just put a link in the in the chapters meeting so family you would mind opening that first one up and work through that one. Then just take them one at a time.

00:14:05 DW for Bioscan

Can I just ask you a question about the agenda just before it disappears off the screen?

00:14:11

Yeah, cool.

00:14:14 DW for Bioscan

Yes, is there scope within this meeting presumably makes sense from the examining authorities perspective. Is there scope within this meeting to discuss the issues that I raised?

00:14:24 DW for Bioscan

Uh, in my various submissions as well as the issues that call is raised, I think there's there's a clear synergy between the two, but to the extent that anything I've raised is not already covered in full submissions, it probably be useful to take this opportunity to discuss some of those as well.

00:14:39

Yeah, I.

00:14:41 AL (AECOM) for the Applicant

I think that's.

00:14:41 AL (AECOM) for the Applicant

The That's that's fine. Well, in terms of explaining it in the narrative to examine authority.

00:14:48 AL (AECOM) for the Applicant

Water, think how?

00:14:49 AL (AECOM) for the Applicant

We present that.

00:14:49 AL (AECOM) for the Applicant

'cause also this is.

00:14:50 AL (AECOM) for the Applicant

A supposed to be second to common grounds between ourselves and and Mr. Collins.

00:14:54 AL (AECOM) for the Applicant

But you know, we can obviously clearly point out where there are you know additions to that or or, or indeed congruence between the two two points.

00:15:03 AL (AECOM) for the Applicant

I think I think that's fine, I don't.

00:15:05 AL (AECOM) for the Applicant

Have a problem with that particular.

00:15:07 Paul Collins

Good thank you OK.

00:15:12 LP (Arcadis) for the Applicant

So I suppose talking through these, if it's great and a pointed at a time. So the first point. I'm not going to read everything out for everyone, obviously.

00:15:22 DW for Bioscan

Sorry it's been there.

00:15:23 LP (Arcadis) for the Applicant

On the screen.

00:15:25 LP (Arcadis) for the Applicant

And yeah, so where we've got points around, you know, uhm.

00:15:30 LP (Arcadis) for the Applicant

You know designated sites and that sort of.

00:15:32 LP (Arcadis) for the Applicant

Thing this point comes up a few times that you know those have been assessed appropriately in the designated section.

00:15:40 LP (Arcadis) for the Applicant

So, think about the county wildlife sites and you know and any potential impacts there, etc. You know, we've been clear about the approach we've taken within the metric around those and is a starting point at a high level.

00:15:54 LP (Arcadis) for the Applicant

You know?

00:15:55 LP (Arcadis) for the Applicant

Where we followed the guidance for the metric, we've done so, but where the dedicated impact assessments have taken place. That is, Tom is taking place in the dedicated section of the S et cetera, so it's that delineates nothing that's important to note as starting point in that first Section a.

00:16:19 LP (Arcadis) for the Applicant

The next bullet point around. I want to talk about in terms of overall compliance. Uhm, not possible to reference locations, et cetera. So, anything here referencing back to the calculations carried out by Bioscan, and further, what we've done within the report itself, so, you know the text in the reports outlines how areas have been assessed, how approaches being taken to strategic significance, that sort of thing. The baseline, the post certain scenarios presented in the figures, and then take them back to the Bioscan report that you know came out with a very similar result. You know it. An exercise has been undertaken to, you know, carry out a validation or checking exercise, or what you want to call it, and you know very similar outcome has been had so I think you know there is evidence there that it is possible to look at what we've done and make sense of this, as it were at the very least.

00:17:28 DW for Bioscan

I have to take issue with that Liam. What I presented in my last latest submission was the best attempt at trying to replicate what you've done. The fact that it came out with a relatively similar end result is not in any degree of validation, it isn't.

00:17:45 DW for Bioscan

It is effectively in the absence of you guys providing the calculations in a transparent manner. It is the best we've been able to do from your submitted material. If we got it quite close, that's possibly

a point that can be made, but it's not, it's in no way a validation exercise. It is a substitution for actually being able to work off your figures because we are not able to do that because there is continued to be this refusal to release those figures. I think that just needs to be on the record if this is going to be something that's going to be handed up to the examining authority.

00:18:22 Paul Collins

Yes, and I think I think it is clear as well, that you know we cannot relate the table to the maps. There is no way of relating these two together despite maps being published in the submissions by the applicant EDF. There's no way of actually relating the two.

00:18:47 DW for Bioscan

We just why don't we just cut to the chase here. Why don't you provide those calculations and then we can all work off the same spreadsheet.

00:18:54 AL (AECOM) for the Applicant

We're happy to do that, but we I think in coming up with the figure that you managed to do. In coming up to 17%, it proves that it was what everything that we've been saying today. It is feasible. You've got the baseline position defined, you've got the future end state and it's just a matter of resource, you know to digitise polygons, to come up with an assessment total. You've achieved 17% on the MDS.

00:19:27 DW for Bioscan

OK.

00:19:28 AL (AECOM) for the Applicant

So you just proved our point effectively Dominic

00:19:32 DW for Bioscan

No. (A) We've not been able to exactly replicate the figure.

00:19:39 AL (AECOM) for the Applicant

The pretty similar in.

00:19:41 DW for Bioscan

(B) We've had to undertake a significant manpower resource. We've had to reply. We are a specialist ecological consultancy with a significant knowledge of biodiversity net gain. If we cannot exactly replicate your figure using your input parameters. What hope is there for any interested parties who doesn't have that level of expertise to actually understand what you've done?

And this is this is the crux of the matter. You're saying that you are now prepared to release these calculations. I first asked for them in July 2020.

00:20:17 DW for Bioscan

And now if you are now saying that you're prepared to release those calculations so that the examining authority can be clearly sighted on where the differences are between us rather than having to work off your version and another version that we had to try and cobble together in the absence of you providing the calculation. The problem there is that there is no transparency there.

You're going to end up working to multiple versions and everyone is going to get massively confused, not least the examining authority.

00:20:48 AL (AECOM) for the Applicant

If you share your version with us, we'll share our version with you. The difference is between 17% and did it 19% on MDS.

00:20:59 Paul Collins

No no.

00:20:59 DW for Bioscan

I think you are completely misconstruing the exercise that we have done. What we've done is a starting point using your input parameters, but you seem to think that because we've achieved the figure, that's quite close to yours, that is the right figure. What we've attempted to do is the first stage of the process of validation and independent verification is to actually try and reproduce your metric so that we can then start checking whether the input and output parameters are correct. So, you're talking about something that is the beginning of the process being the same as something that is at the end of the process. It is completely wrong.

00:21:36 Paul Collins

Can I just take can a minute? Can I just take this back to what is the whole point of the national Strategic Infrastructure Project evaluation and that is that the applicant is supposed to provide the information which actually underpins their application in all manner. This has not been done. You can't do it from a report taken from a report without showing exactly how you got there, and I don't really understand why when there are many other reports from other third parties which you have published in full in your application. You haven't done it for biodiversity net gain.

And the fact that you are the fact that you're about to come back to it now, which is OK, is very good, but it's very, very late in this process. So you're putting us into a position where we even have to look at your numbers and your calculations and figure out what it is and if there are any issues with that.

00:22:47 DW for Bioscan

I could just make it one thing absolutely abundantly clear, given that there is a recording of the transcript here, that the figure that we have achieved is the closest figure we've been able to achieve to where you guys got to. It does not account for any independent evaluation whether your inputs and your outputs are correct. What we have simply done is try to get to the starting position of that process. The easiest way to get to the starting position of an independent validation process is for you guys to give us your figures. You've refuse to do that, so we've attempted to reconstruct what you did to get to your figures.

You don't seem to understand the difference between us achieving an output by trying to recreate your metric that's quite close to your result and us challenging the inputs and output parameters. We've simply not. I mean, if you're going to go back to the examining authority and you're going to say that Bioscans reconstructed metric is in some way a validation of what we've done then that is completely wrong, and I want that on record right now.

That is the start of the process. All we've done by that exercise is demonstrated it is not actually possible, as you've claimed repeatedly, to actually independently reconstruct the metrics. Even a

well experienced environmental consultancy practise putting lots of people onto the job has not been able to exactly replicate your figure, and there are clear differences in that metric. So we can't even get to the starting position of an independent validation exercise without you guys providing your full calculation.

If you're now saying Alan that you're prepared to do that, then that is extremely welcome. You say that we haven't yet provided ours. I did actually provide the spreadsheet to the examining authority. I see that what they've actually put up on their document server is a PDF of it.

00:24:38 AL (AECOM) for the Applicant

I think you hit the nail on the head there Dominic. You cannot share models transparently through a PDF based examination library.

00:24:47 DW for Bioscan

So, I'm not, but Alan I've not asked for that. Back in June 2020, I asked for the Excel spreadsheet, so that we could understand what was done. If you're if you're now saying that that kind of media and formatting issues in relation to the presentation of examination documents is an excuse not to provide your calculations.

00:25:06 AL (AECOM) for the Applicant

It's not excuse, it's a reality.

00:25:09 DW for Bioscan

We looked at the justification for not providing the calculations, then that they don't work very well in PDF, and that you're not prepared to provide Excel spreadsheets.

00:25:17 AL (AECOM) for the Applicant

No, it's the reason why there's lots of modelling that we've done in lots of areas whether it be coastal processing, whether it be fisheries modelling, you cannot interrogate it via the mechanism of the examination library. It is not feasible.

00:25:34 DW for Bioscan

You can provide experts with those calculations in in order to allow people to come to an informed view as to whether those calculations are valid.

00:25:44 AL (AECOM) for the Applicant

We just agreed that we will share them with you.

00:25:47 DW for Bioscan

Well, that's progress.

00:25:49 Paul Collins

I'd like to see the report and also the original report and the spreadsheet is what we would really like to be able to see here.

00:25:58 Paul Collins

I mean, there are all sorts of formats placed in the examination library. I'm not sure whether Excel spreadsheets are.

00:26:05 AL (AECOM) for the Applicant

Most of them don't work.

00:26:07 Paul Collins

PowerPoint's seem to work fairly well and stuff like that so anyway.

00:26:24 DW for Bioscan

I mean, we've got some progress there, so with what three or four weeks to go to the end of the examination, we are now finally going to get the calculations that were asked for in June. First, after in June 2020 that's progress. And just to be clear what we want to do with those calculations is once we've got your full calculation, we can then understand very, very late in the day, but going out and checking a field by field, if necessary, through individual inputs and check their veracity in terms of whether the condition assessments are accurate. Whether the habitat classifications are accurate.

We haven't been able to start that process because we simply haven't had that information and, as Paul has articulated very well, one of the problems that is that you've aggregated all of your inputs for certain habitat types, such as arable of certain condition and 30 something field units aggregated into one line on the spreadsheet, which means that you can't do a field by field assessments. So that is the process that we would like to go through. An independent validation and verification process and that is one of the reasons why, well it is the main reason why, we wanted to have sight of the calculations. You simply cannot do it on the basis of your biodiversity net gain report.

00:27:44 MG (Arcadis) for the Applicant

May I ask a question? This is a very open, just you know of interest question. As it's not a requirement, the Net Gain, and it is an enhancement that's voluntarily submitted by the client. I'm just wondering in the what the sort of end outcome is of the checking of the veracity and once you have done that, what is it that you would like to see? Is there some is there a target or a number that you would like to see demonstrated.

00:28:16 Paul Collins

I think we're not after a target or a number, we're after an open discussion. You've provided this information on behalf of the applicant, it's gone to the Planning Inspectorate who understand what the legal situation is, as far as whether you need to do this or not, but you provided it. So it has to be open, it has to be understandable and it has to represent exactly what the situation is.

We're not saying we need this to be 15% or 10% or 3% or minus 8%. We don't know.

What we want it to be is a bet is a true reflection, if you're going to give this sort of information, don't give us numbers which are not truly representative of what is actually going to happen. Not only at the beginning where we are now and at the end where we end up in 12 years time or so, because nobody knows exactly how long this is going to be. We need to see what the overall impact is and at the moment just claiming 19% or 18% or whatever it is. 19% net gain simply doesn't really reflect the situation that we're in here, and that's the other part of it which is in my other paper.

00:29:45 MG (Arcadis) for the Applicant

You think it doesn't reflect. So you feel it's an overestimation. I'm just trying to get to that outcome.

00:29:50 Paul Collins

Yes.

00:29:52 DW for Bioscan

We might be able to independently verify whether that is a fair assumption to reach. The bottom line Martina is it is non mandatory, but obviously if your biodiversity net gain condition assessments and classifications are wrong then that is a matter that goes to the heart of whether your non BNG assessments are right or wrong and obviously that goes to the core of the EIA process and the core of the decision making process.

So the biodiversity net gain element is intertwined with the accuracy of the ecological assessment more generally. If we find major problems, you've elected to quantify certain habitats as a certain condition, and you've elected to say that in 12 years time, 15 years time they will be a different condition. We want to check the veracity of those claims.

We want to check whether the baseline assessment is correct in the first instance, but we also want to check whether they are realistic assumptions to make about where that habitat will be in 15, 20, 25 years.

Because we very much suspect, and this is all set out in my latest submission, and we very much suspect that there has been artificial suppression of the baseline value of some of these habitats and artificial inflation of where they're going to be in 20 to 25 years time.

00:31:16 MG (Arcadis) for the Applicant

Exactly, there certainly hasn't been. I have to say very strongly that there has been no artificial anything on our part.

00:31:25 DW for Bioscan

If we're provided with figures, we can go round and independent representation.

00:31:29 MG (Arcadis) for the Applicant

People would do, but we certainly haven't approached this with any bias at all, and you know that I just want to be clear about that.

00:31:38 DW for Bioscan

Well, there's part it's just bias and then there's also base error and training.

00:31:45 MG (Arcadis) for the Applicant

Yes, they are two different things and I'm assuming you guys have read the LEMP as well, which is obviously important to actually what we what we're doing. But I think we can move on from maybe that point now, but thank you, that that's helpful.

00:32:01 DW for Bioscan

Thank you.

00:32:06 LP (Arcadis) for the Applicant

Down through there, I think we've covered that point. Sorry, I'm just going down checking, we've covered bits that was going past.

00:32:24 Paul Collins

Just going back to that issue about the claim for the main site being 18.03% and the fact that you've taken your biodiversity net gain and only compared it to the main site as opposed to the main and the off-site. It was pointed it was pointed out by the RSPB and I also pointed it out in my not in this document in the previous document.

00:32:51 LP (Arcadis) for the Applicant

I mean the approach that we followed with these calculations as per the PM 2.0 guidance. That's how the metric calculates it, and that's what we've done.

00:33:02 Paul Collins

Seems to be a difference of opinion there.

00:33:05 AL (AECOM) for the Applicant

So what was your point there Paul? I was trying to get to the bottom of what you meant there.

00:33:08 Paul Collins

So the main site is split into on-site and off-site and the main site which is the main development site and some of the fields that surround it.

00:33:18 AL (AECOM) for the Applicant

The order limits and the EDF Estate.

00:33:21 Paul Collins

Yeah, so you've taken the overall biodiversity net gain from both of those, but only compared it to the main site. So you've not compared it to the total area of the site and the total biodiversity starting point.

00:33:37 AL (AECOM) for the Applicant

I don't understand the point, the whole thing. Liam can you clarify?

00:33:41 LP (Arcadis) for the Applicant

I mean so the point as I understand it that Paul is making that when you're working out the percentage change what your numerator and what's your denominator effectively? And my response was that you know the numbers that we have returned there as you know as calculated and presented by the metric and it will be a point for, I suppose, Natural England. You know, you know. Consultation responds where appropriate that you feel that, doesn't you know, that you disagree with that approach.

00:34:12 Paul Collins

It's not only me that doesn't agree with it. It's the RSPB and others. They actually say it should be over the whole site. You can't take the best of, you can't take what the off site is giving you and then

compare it only to the main site when the off side has some level of contribution already. So, you're basically taking the plus without the minus and it means it means about a 4% difference, 5% difference, which will make a big difference on your 19% as well.

00:34:44 LP (Arcadis) for the Applicant

As I said, we followed the guidance. Since we carried out calculations using the metric, and that's how the metric calculates it, the metric is always a, you know it is a tool. It is a proxy for biodiversity value and that is how Natural England have decided to calculate biodiversity net gain to calculate to account for onsite and offsite elements and we think on that note.

00:35:07 MG (Arcadis) for the Applicant

And also it is a moving feast. It should be pointed out, shouldn't it? It's still a very moving feast and I imagine that, throughout the lifecycle of the project recalculations and re-evaluations will be made.

00:35:32 LP (Arcadis) for the Applicant

And so, I think here then the point is around the ongoing habitat creation where that is and the targets that have been set. For you know what we're aiming towards in the long term, and I think the key document there were a lot more details providers in the LEMP documents around you know where we are and how we're going to get to where we're going to get to.

00:35:59 DW for Bioscan

I'm fine, I'm very interested in that point actually, because one of the points I raised in my deadline 7 submission was what is going to substantively change between management of the Sizewell Estate at the moment and management of the Sizewell Estate in the future, because at the moment, what your metric figures are saying is this value is that management of the Sizewell Estate to date has not been very good. And that it is going to be a step change to some kind of spectacular new management into the future, because otherwise I don't know how you're going to get from a kind of a generally fairly poor level of condition, so you are generally fairly good level.

00:36:43 AL (AECOM) for the Applicant

But we don't accept the generally poor level condition I mean. There is an Estate wide management plan which is being submitted at Deadline 8 on Friday, which effectively captures the delivery of all the existing management plans that sit underneath that Estate wide, so there's no ambiguity within the order limits we've got the oLEMP which I think Martina has already referred to, which secures things like the restoration of the temporary construction area north of Kenton Hills in the long term, but the Estate wide management plan is in an Estate wide.

00:37:23 DW for Bioscan

So, what's going to improve? What's going to improve?

00:37:31 AL (AECOM) for the Applicant

What which means actually, I mean. The habitat we're already establishing on Studio Field, will, you know, will be further managed to enhance them for, for example, you know Heather establishment, et cetera. So, we've got Heather plots happening this autumn to extend the cover of heathland in Studio Field complex.

00:37:51 DW for Bioscan

So are there going to be new management bodies brought in to secure this kind of step change? Because I'm not sure you're getting the point. The point at the moment is that the way that the net gain figures have been constructed is that the existing estate is in relatively poor condition and that in the future it will be in relatively good condition. Now, the corollary to that, of course, is that means that existing management of the estate has not been very successful, but that it's going to massively improve in the future. I'm just interested in how that's going to happen.

00:38:22 AL (AECOM) for the Applicant

I don't think I accept the premise I I don't know Liam. Would you like to say a little bit about the starting point and the end point that you've assumed in the assessment? Obviously at the moment, and certainly in relation to some of the fields where at it you know we're in an intermediate stage compared to the original baseline which arable fields? So, do you want to say a little bit about the assumptions that you've made? You know, moving between a baseline position and as observed in the field position in some cases, and future condition.

00:38:54 LP (Arcadis) for the Applicant

I think that's the key point around that a lot of these areas where improvements are being made are in that transition period of, you know they're going from, you know, A to B that you know if it's starting as an arable field, and in some cases it is and moving towards, the more you know semi natural habitat that that change process.

00:39:10 DW for Bioscan

I'm sorry, can I just be clear I'm not talking about new habitat creation quite so much as improved management of retained habitats. The assumption being that their existing poor condition is going to be hugely improved in the future, and I'm just interested in the mechanism for that, given that they are already under a management regime.

00:39:32 AL (AECOM) for the Applicant

Which retains can you see this example of what retained habitats are?

00:39:35 DW for Bioscan

Like some of the woodland areas, for example.

00:39:38 AL (AECOM) for the Applicant

Right, what have we assumed in relation to the metric? What have we assumed in relation to existing woodland Liam? We should talk this one through.

00:39:46 LP (Arcadis) for the Applicant

I think going, for example, you know the large area of plantation coniferous woodland that has you know, assessed through the condition assessment sheets et cetera. You know? For example, for example, the woodland areas don't score very well, that the guidance is that you know these plantation woodlands and coniferous woodlands that are relatively young are.

00:40:10 DW for Bioscan

You've classed them as poor.

00:40:15 LP (Arcadis) for the Applicant

Yeah, so it's guided that there isn't, you know, a great deal to you know I don't think there's a great deal of wiggle room there at all, really. It's you know, it's the guidance is that those sort of habitats are poor condition and that's defined by the metric that those sort of plantation coniferous Woodlands are poor condition in general, and you know, we've looked at them and agree with the assessment of the metric. That yes, that does fit there, or you know, a fair reflection.

00:40:41 DW for Bioscan

OK, well let's let's.

00:40:43 DW for Bioscan

Let's take this from an ecological common sense perspective. If other coniferous Woodlands, which is a category under the metric varies from poor to good. You've classed these plantations, which are generally fairly mature pine plantations with a fairly open structure, fairly broad rides, a decent understory and ground floor layer. You've class those as poor. So what room does that lead to class something like a dense Sitka Spruce plantation which has just got a carpet of needles under it. If those if those plantations at Sizewell are poor, what are they? Are they extremely poor or are they some new category that's even lower than that?

00:41:29 LP (Arcadis) for the Applicant

So, I think, to take it back to the point that the metric is a way of assessing biodiversity. It's not, you know, it's a proxy value for biodiversity and the metric guidance lays out a series of ways, methods of how habitat should be assessed, and we followed the guidance as it was at the time Vector 2.8 and the metric 2.0 has certain ways of assessing certain habitats of which woodland and grassland are a couple of examples where at the time the guidance lead you down a certain route for certain habitats and it lead us down a certain route for the plantation coniferous woodland that it assessed as poor relative to other habitats, and that is how the guidance is written and that's the guidance that we followed, and that's how we got to the assessment.

00:42:15 MG (Arcadis) for the Applicant

Is it worth sharing any of the condition assessment? Will that be helpful?

00:42:24 DW for Bioscan

What this sounds to me like almost using the guidance to retrieve a preordained conclusion as opposed to just you applying it.

00:42:37 AL (AECOM) for the Applicant

No, we refute that we followed the guidance.

00:42:41 DW for Bioscan

Well, at the end of the day there's ecological common sense isn't there, and if it overrides the guidance then you are allowed within assessment to handle override. You can override the concept which is exactly what you can do.

00:42:52 AL (AECOM) for the Applicant

Come on, you cannot override the guidance. You'll be the first. You'll be the first to criticise us if we override the guidance and came up with our own approach and you know we will clearly need to make that point more clearly in the joint Statement Common Ground.

00:43:06 DW for Bioscan

The guidance is there to be overridden, provided the appropriate justification is given. Given that that is part of how the metric system works, that's why it has that huge bar at the right hand end of all of the tables that allows you to put in your justification comments.

So, in a situation where these Woodlands, clearly, if there is a sliding scale of quality from something dreadful like a dense Sitka spruce plantation which allows almost nothing to grow underneath it, that is clearly going to fall at the bottom end. If you imagine because obviously that category doesn't include Caledonian pinewoods, so if you imagine the best possible quality of other coniferous woodland achievable, the plantations at Sizewell clearly cannot come at the absolute bottom end of that sliding scale, and that's where you put them.

00:43:55 MG (Arcadis) for the Applicant

Dominic, what were they in your assessment?

00:44:00 DW for Bioscan

You would have to say you'd probably put them somewhere in the middle.

00:44:03 MG (Arcadis) for the Applicant

But you have assessed them. Haven't you So what? What did you? Assess it.

00:44:07 DW for Bioscan

Well, I still haven't been to the site because of COVID and because of everything else, but I've seen pictures of the plantations. I also know that area pretty well.

00:44:14 AL (AECOM) for the Applicant

So you haven't been to the site.

00:44:16 Paul Collins

Excuse me, I've been to the site and I walk past them on a regular basis when we take people round and through that site and what Dominic is saying is completely correct. There is good understory growth there. They are well spaced. It's not like one of those plantations which would be at the poor end where nothing grows underneath apart from a carpet of pine needles.

00:44:41 DW for Bioscan

I say I've not been to the site, what I mean is I've not been into the site within the last 18 months. I've been around that area. I'm a lifelong birder. I know Minsmere very, very well indeed. So, I do know those plantations pretty well. I know their structure, I know their character, I know the type of thing we're talking about. I know it's not the same as a dense Sitka spruce plantation on some hillside. Where you've got nothing underneath, no lights, no ground flora. So, it's a point of simple common sense and it is not possible, I don't believe, if you're taking a fair and objective assessment to justify your allocation of those plantations, regardless of what the guidance says, whether it's supporting them in any way, it's not justifiable to put them into the lowest possible category.

What I'm now interested in also is it what you're going to do to them to turn them into one of the highest possible categories in 20 years, which is what you claim is going to happen.

00:45:33 Paul Collins

The other thing that is clear, is that actually, that central spine of the development site ends up as a very significantly less biodiverse area, even under those conditions that you're talking about than it is currently. The corridor between Sizewell across the AONB and between Sizewell Marshes and Minsmere is severely damaged. And that's based on your own biodiversity net gain numbers. It's like 75%.

00:46:09 AL (AECOM) for the Applicant

I don't think I recognise that Paul.

00:46:13 Paul Collins

Your figures say 26% reduced biodiversity net gain for the main site as a corridor between Sizewell Marsh and the SSSI and Minsmere. That's what your numbers say. It's not my numbers, those are the ones that you've reported.

00:46:27 AL (AECOM) for the Applicant

Don't recognise that.

00:46:30 Paul Collins

Why don't you recognise your own numbers? This is the second time we've had this. You don't recognise your own numbers for the shingle where it's a 95% or 96% reduction.

00:46:40 AL (AECOM) for the Applicant

We can get to that. We seem to, yeah, we can get to that.

00:46:45 Paul Collins

But you keep saying you don't recognise your own numbers? I don't recognise why you don't recognise your own numbers, I just take your spreadsheet and look at them.

00:46:57 AL (AECOM) for the Applicant

The headline commentary you're extrapolating from the numbers is something I don't recognise.

Just in relation to woodland we are, it is true, that we are felling an area of plantation on Goose Hill. You know, that is not in dispute but if you look at the OLEMP, we are creating new broad corridors from the retained Kenton Hills northwards, towards Ash Cottages to link up with Ash Woods and also back across, in part, across the Goose Hill, to link up to that retained border of the eastern edge of Goose Hill, which we are retaining during construction.

So it's not correct to say that there's a detriment in the long term, to fragmentation. We acknowledge the short-term challenges of fragmentation and that that you know that is reflected in in the environmental statement where appropriate. But in the long term you look at the OLEMP, if you look at the habitat proposals which are secured under DCO, there is no doubt there is greater connectivity and less fragmentation across that landscape in the future than there is at present. Now we acknowledge it will take time to get there, but that time you know is accounted for in the difficulties within the metric. So you know, there's no way of amending those scores.

Simply because you know woodland is. I mean, Liam you can explain why woodland doesn't. If you were to try and create biodiversity net gain positives, you wouldn't start creating woodland because there's got such huge discounts on it achieving these values. In future you wouldn't use woodland.

If you were trying to create BMG because you're penalised so heavily, I don't know Liam, if you want to say a little bit about Woodland briefly.

00:48:55 LP (Arcadis) for the Applicant

Sure thing, so yeah it does as Alan said it does recognise that it is difficult to do and that is part of, you know, you know the that it is recognising these are ambitious targets to try and you know leave something that is in a good state at the end state of this process and as Alan says you know it doesn't score particularly well if games were being played around BNG, it wouldn't be woodland that would be prioritised it would be other habitats. So, you know the BNG metric is designed to assess the landscape design, and that's what we've done following the guidance.

You know we've not made massive changes to try and just hit biodiversity net gain that you know the BNG doesn't take anything away from any other assessments around the connectivity points. Obviously connectivity is part of the metric, but again we followed the guidance on that point around, you know, Natural England's guidance at the time and yeah, the other one says you know the connectivity points been assessed elsewhere.

00:49:54 Paul Collins

So, you say on one hand, you're saying you agree with the biodiversity net gain calculations. On the other hand, you're saying it doesn't really reflect what it is you're doing so you want it both ways.

00:50:07 LP (Arcadis) for the Applicant

I think the point I'm trying to make is that you know the biodiversity net gain doesn't take away from any of the other assessments. Just because we're saying there's a change in biodiversity unit, we're we're not going to do this or that, we're not going to assess anything else. That's completely not the case. What I am saying is that there have been dedicated assessments to each of these topics where relevant and the biodiversity net gain sits outside that. It doesn't take anything away from the assessments, the other dedicated assessments.

00:50:29 DW for Bioscan

It's got to be consistent with them though, doesn't it?

00:50:31 AL (AECOM) for the Applicant

Of course it's consistent with them and you know and the team have assessed that assessed the landscape master plan and all the future proposals. Of course they're aligned with that, but the point I was making in relation to woodland, if this was driven entirely simply by trying to maximise BNG score, I wouldn't be planting great swathes of native woodland between Kenton Hills and Ash Cottages or back across Goose Hill when we removed the TCA it wouldn't be doing that. I'd be creating more grassland and heathland because it would score better on the BNG assessment basis.

But I don't live in that world, I've got to reconnect the landscape for bats, which is one of the reasons why we're doing all that enhancement, the North, South and East West connectivity. So, you know, this isn't driven entirely by trying to gain, you know, trying to assess, maximise the BMG score. That's never been the intention.

00:51:29 DW for Bioscan

No, I don't.

00:51:30 AL (AECOM) for the Applicant

I think. I don't.

00:51:30 Paul Collins

I don't think we're saying that, but I think what we're saying is, the assessment you make, the assessments you're making are reflecting that, and we're just reflecting what your assessments say.

00:51:44 DW for Bioscan

The point here Alan is that nobody is suggesting that you have driven the whole of the LEMP and the oLEMP and what have you and the habitat, creation schemes and the compensation schemes on the basis of going to get the maximum possible biodiversity net gain score. That would be an extraordinary approach.

You yourselves have said that it's ancillary because it's non mandatory, but it has to be consistent and obviously what we're interested in doing is if there are problems with the biodiversity net gain assessment, such as I think have been revealed in relation to the, when we talked about woodland, then they are problems that then must reflect on the subjective assessments.

That you've done within the normally EIA context. So if you undervalue, if you've undervalued habitats in the metric in the baseline state, then that undervaluing must be endemic to the EIA process generally.

00:52:39 AL (AECOM) for the Applicant

Well, of course we don't accept that.

00:52:41 MG (Arcadis) for the Applicant

He's gonna say. I mean it's being taken much later. In fact the impact assessment for receptors was in place much earlier. So, we actually started doing the biodiversity net gain for this much later in the day and as Liam and Alan have both said that was taking existing and or then tweaked and decisions that are already been made and looking at the numbers behind it. I don't know whether it's.

00:53:07 DW for Bioscan

The decision that these plantations were poor condition, poor examples of coniferous of non-native coniferous woodland was taken in the EIA process and also part of the BNG assessment. The BNG assessment followed up.

00:53:23 MG (Arcadis) for the Applicant

The BNG assessment, as Liam has said, sits outside because we're following condition assessment guidelines rather than signing impact assessment guidelines. So there are two different. There are two very different assessments.

00:53:33 DW for Bioscan

I'm not clear. Is there a discrepancy between the approach taken to valuation, in the evaluation of the retained habitats?

00:53:45 MG (Arcadis) for the Applicant

We've that we've followed the CIEEM evaluation for impact assessment, and we've followed the Natural England evaluation for BNG assessment and.

00:53:54 DW for Bioscan

You're happy that when BNG, your BNG assessment values something is in poor condition. It's a poor-quality example of a high percent poor condition. And that is entirely consistent with the approach that you've taken under the CIEEM guidelines, yeah?

00:54:07 MG (Arcadis) for the Applicant

No that's not what I've said completely the opposite, in that they're separate. They sit outside, they are separate to each other.

00:54:13 DW for Bioscan

If there's a discrepancy is to do with different processes rather than.

00:54:18 MG (Arcadis) for the Applicant

If there is a discrepancy is because. I mean BNG is not meant to be an impact assessment tool. And I think we need something actually.

00:54:25 AL (AECOM) for the Applicant

Exactly right Martina and the point about the environmental statement is if you actually read Chapter 14, I think it is volume 2 with the ecological chapter and it's a long read, about 450 pages I think, the area of Goose Hill just taking Goose Hill as an example I think that's assessed under the ambit of one of the County Wildlife Sites, so we're looking at the impacts on the county wildlife site in that in that location.

00:54:48 DW for Bioscan

Exactly, so I mean, that's a good point, Alan. So, it's designated as a County Wildlife Site in part for habitat reasons, and yet, in biodiversity net gain terms it scores this poor condition. Can you not see that there's an inconsistency?

00:55:06 LP (Arcadis) for the Applicant

The pass is biodiversity net gain assessment is obviously the strategic significance element and that part where you know this value associated with, you know, non statutory designated sites comes into it.

00:55:22 AL (AECOM) for the Applicant

We've got 7 minutes left of this meeting.

00:55:23 DW for Bioscan

I'm trying to understand the point your making. Is there any inconsistency or not between greatly teaching it or both.

00:55:27 MG (Arcadis) for the Applicant

I think we're not going to make any progress on this one, I think we should agree to maybe go and provide a detailed breakdown of the condition assessment as per the guidance. It's already in the

report, but we can give maybe more detail on that because, as Alan said, we don't have much time left so.

00:55:47 DW for Bioscan

That that's why you're providing the calculations. Then we can take an independent view. We can put all our comments in, yeah?

00:55:53 AL (AECOM) for the Applicant

Are there any points that you wanted to cover now face to face in the remaining 6 minutes rather than have a wider debate upon the alignment between BNG and the ES, which I don't think is the purpose of the meeting, or it might be from your perspective, but it isn't as directed by the Examining Authority.

00:56:11 DW for Bioscan

It's clearly relevant to decision making.

00:56:13 E (Arcadis) for the Applicant

Oh, this is quick point before the end of the meeting, it might be worth just quickly going over the actions from the meeting and sort of conclusions that we've had as well.

00:56:24 AL (AECOM) for the Applicant

Thanks Emily. I think that we will do that and are there any more technical points that you wanted to get out of this meeting? Or will we resort to

00:56:35 DW for Bioscan

From my perspective, Alan, if you're going to provide the calculations that that's a huge step forward and we can then take those away and we can independently verify them or otherwise, and then that can go into the mix in relation to the examination. The disappointing thing, of course, is that we are a matter of a few weeks away from the end of the examination unless it's extended and this should have been done almost 18 months ago.

00:57:02 AL (AECOM) for the Applicant

Well, of course we don't believe that, but anyway. Any particular technical points you want to go through now, Paul. This is your meeting after all.

00:57:16 Paul Collins

Just looking, I mean providing all that information is going to be useful. I'm still concerned that actually none of the assessments look at the project overall and I know you might say that that actually isn't really a part of what you're supposed to do. But there's no real accounting for 12 years when you basically have scorched earth on the main site, there's nothing there.

00:57:39 AL (AECOM) for the Applicant

Well, it's not in the metric.

00:57:41 Paul Collins

I know, it's not in [the metric] and I pointed out that you know, I understand. I understand where the biodiversity and the way it looks at the beginning and the end, but the fact of the matter is most projects don't take 12 years when all you have is basically nothing.

00:58:00 AL (AECOM) for the Applicant

It's a fair point, but we obviously used the metric and try to apply the guidance as best we can and that's what we've done.

00:58:08 Paul Collins

Just as a matter of interest, did you actually take a look at the biodiversity metric three at all?

00:58:15 AL (AECOM) for the Applicant

So, our position on biodiversity metric 3 is we're not going to use it.

Obviously the Arcadis team have looked at it.

We're not going to be using it. We're not going to be using it because Natural England says we shouldn't be using it. The RSPB said that deadline 6 that we shouldn't be using it. The RSPB / Suffolk Wildlife Trust I think they change their mind because at deadline 7 their representation says that we should be using it. So I'm not quite sure who was authoring the two different reps, but.

00:58:40 Paul Collins

Basically then actually Natural England say if you're asked to do it then you should do it. But also, I understand that it might have a different result to what the metric 2 you know, what it says. You know, it's ambiguous. But I was just interested to know whether you had actually bothered to look at it, which you obviously have.

00:59:00 DW for Bioscan

And of course, once we've once we've got your calculations, we can potentially run them through metric three and see what it does in any event.

00:59:07 AL (AECOM) for the Applicant

More than more than welcome to do that, if you think that's a worthwhile use of your time and the teams time.

OK, right and we've got two minutes left the so the actions are for us too, for Liam to send through, given that Paul, we've got Paul's email, Paul is the linchpin of the meeting here the reason for meeting, we'll submit the spreadsheet based tool, isn't it Liam, will submit that too. Paul, we'll expect the same back from you in relation to Bioscan working and move forward from there.

And we we're happy to use email going forward to exchange, points, critique, whatever if you want to try and understand why we've taken a particular position, then feel free to do so by email. Copy everybody in on the call.

01:00:10 Paul Collins

Well, I would say if you're going to provide the spreadsheet, if there's anything that you think that should accompany it, which will explain some of your position and the way it's been generated, I think that would be very helpful because rather than perpetuate this back and forth on email, it would be nice to have everything.

01:00:28 AL (AECOM) for the Applicant

Paul was just extending the offer to support as you see fit.

01:00:38 DW for Bioscan

I think it's crucial given the time that we've got left. I think it's crucial that we have that spreadsheet in pretty short order and I think given the purpose of this meeting is to try and find points of common ground. We've got one point of cartogram, which is that the calculations will be provided, and I think perhaps the most expeditious way of taking this forward in the remaining weeks is once we've got it, and once we've reviewed it, we could perhaps offer some statements for common ground and you can perhaps do the same, and we can try and cobble something together for the examining authority. That's going to be the most helpful to them.

01:01:12 TL

Can I just asked if the original Arcadis reports are too big, could you send them by WeTransfer?

01:01:21 LP (Arcadis) for the Applicant

WeTransfer is something that we've used.

01:01:23 TL

Yeah, that if they're too big to get into an email.

01:01:27 Paul Collins

Whatever is whatever you feel is appropriate, send them to us and we'll.

01:01:31 DW for Bioscan

And speed is the essence now, isn't it?

01:01:34 AL (AECOM) for the Applicant

Thank you very much, right? OK, thank you everybody. Paul, good luck. Are you appearing at the desal hearing next week?

01:01:44 Paul Collins

I'm not. It's not next week. It's on October the 5th and unfortunately the lateness of that whole thing Change 19 means I'm on holiday so.

01:02:00 AL (AECOM) for the Applicant

Early times I'm on holiday as well. So I won't be here.

01:02:02 Paul Collins

So, I'll have to have somebody else to deal with that. I think, I think Northumbrian water doing a fantastic job personally, but there you go.

01:02:17 AL (AECOM) for the Applicant

Or all the best, everybody have a good week and. Thank you.

01:02:21 Paul Collins

Alright, thank you very much for setting it up, really appreciate it.