

ISH2 – ALC errors and inconsistencies

14 Jan 2025

In our November WR submission REP2- 024 we advised that there were a considerable number of errors and inconsistencies (23% of observation points) contained within the submitted ALC data table.

In response APP/9.28 EN010142-000890 the applicant has commented that *'The Applicant is confident in the reliability of the data within the ALC assessment. Natural England retain a number of ALC specialists. The ALC assessment including the data presented in the ES has been reviewed by Natural England. Natural England have not raised any concerns regarding the errors and inconsistencies of the ALC assessment provided by the Applicant. The Applicant has prepared a Statement of Common Ground with Natural England which sets out these discussions: Statement of Common Ground with Natural England [[EN010142/APP/9.18(Rev01)].'*

Having reviewed their response and the referenced SOCG I can confirm that there is no reference in any of these submissions that Natural England have reviewed the contents of the ALC data table. Therefore I ask Natural England 'Have they actually reviewed the submitted ALC data table' and are they comfortable in their position that a report containing 23% errors and inconsistencies is acceptable?

In the absence of Natural England at the Issue Specific Hearings can I request that the ExA seeks these assurances from NE.