



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Boston Alternative Energy Facility

Appendix C2 to Natural England's Deadline 2 Submission

**Natural England's Comments on 9.15: Addendum to Chapter 17 and Appendix 17.1 -
Benthic, Ecology, Fish and Habitats [REP1-028]**

For:

The construction and operation of Boston Alternative Energy Facility (AEF) that would generate approximately 102 MW of renewable energy and is located immediately south of Boston town, Lincolnshire.

Planning Inspectorate Reference: EN010095

11th November 2021

Appendix C2 Natural England's Comments on Addendum to Chapter 17 and Appendix 17.1 – Benthic Ecology, Fish and Habitats [REP1-028]

Introduction

This document provides Natural England's response in relation to the following documents:

- 9.15: Addendum to Chapter 17 and Appendix 17.1 - Benthic Ecology, Fish and Habitats [REP1-028]

Summary

The focus of our review was on whether our concerns had been addressed by the Applicant. Unfortunately, most of our concerns remain outstanding. Therefore, Natural England advises that our previous advice presented in our Relevant/Written Representation [RR-021] remains unchanged. Therefore, the advice provided below should be read alongside our RR/WR [RR-021].

Detailed Comments

1. Paragraph 1.1.5 states "*The updated impact assessment relating to habitat loss of saltmarsh demonstrates no change to the impact magnitude, and therefore no change to the impact significances as reported within the original application documents.*" Natural England advises that further clarification on:
 - a) this relates to the development site i.e., where the wharf is positioned?; And
 - b) if loss of saltmarsh been ruled out at the proposed Habitat Mitigation Area or elsewhere along the channel from wave erosion caused boat wash?
2. Paragraph 1.1.6 states "*offsets for habitat loss... will be reported in an updated Outline Landscape and Ecological Mitigation Strategy (OLEMS)*". Natural England advises that until this document is received, we are unable provide further nature conservation advice in relation to habitat loss.
3. Table 2.1 – Natural England remains unsure as to why ship wash and impacts on saltmarsh have been raised in Section 4.2?
4. Paragraph 4.2.2 states "*The impact significance is reduced to minor adverse with the proposed mitigation and net gain measures in place.*" However, the details of the proposed

mitigation and net gain measures in relation to saltmarsh loss has yet to be presented. The focus of mitigation measures to date have been on saltmarsh as supporting habitat for bird resource rather than as a priority habitat in its own right.

5. Paragraph 4.2.3 states the *“condition assessment has been taken from monitoring reports undertaken for the Environment Agency where the saltmarshes in this area were repeatedly described as in poor condition (Holden, 2017)”* Natural England advises that there are no recent project specific surveys presented as part of this Application. However, Natural England went out on site on 7th September 2021 and, although there was limited access, our observations identified that the saltmarsh wasn't dissimilar to the saltmarsh found throughout the designated saltmarsh within The Wash and North Norfolk Coast SAC. NE continue to disagree with classification of poor saltmarsh quality (acknowledged by the Applicant in Section 4.2.3 of REP1-028). Natural England doesn't support the condition assessment undertaken by the EA in 2017.
6. Paragraph 4.2.3 - As noted above, until the OLEMs is submitted into examination we are unable provide further nature conservation advice in relation to habitat loss. Also, it is not clear that the Applicant is going to reassess their condition of saltmarsh following NE advice.
7. Paragraph 4.2.4 states *“The amount of saltmarsh in Lincolnshire is estimated at around 4,223 ha (page 102, Boorman, 2003) and the proposed wharf will result in the loss of 1ha of saltmarsh. This results in a loss of 0.02% of the saltmarsh from the Lincolnshire coast”*. Natural England queries why the EA layers were not used to calculate saltmarsh area? Also, the reference to the % of loss from all the saltmarsh on the Lincolnshire Coast is not appropriate; saltmarsh is a priority habitat under NERC, avoiding the loss of this habitat should be a priority.
8. Paragraph 4.3.6 - Natural England welcomes that the habitat mitigation area has been considered. Please see Appendix D2 at Deadline 2 for further comments on Air Quality matters.
9. Paragraphs 4.3.7 to 4.3.16 – comments on these sections have been included in Appendix D2 at Deadline 2.