



**Comments on the Outline Surface Water Drainage Strategy  
for the  
Royal Society for the Protection of Birds**

**Submitted for Deadline 2**

**11 November 2021**

**Planning Act 2008 (as amended)**

**In the matter of:**

**Application by Alternative Use Boston Projects Limited for an  
Order Granting Development Consent for the  
Boston Alternative Energy Facility**

**Planning Inspectorate Ref: EN010095**

**Registration Identification Ref: 20028367**

- 1.1 We welcome the submission of the additional information on surface water drainage by the Applicant.
- 1.2 We have an interest in surface water as we abstract up to 500,000m<sup>3</sup> per annum from the local drainage network before water is discharged to The Haven via the Wyberton Marsh pumping station (Figure 1). We undertake this activity under Abstraction Licence (4/30/12/\*S/0295) and through agreement with the Black Sluice Internal Drainage Board
- 1.3 The Application, therefore, has the potential to affect the species and habitats for which we manage the reserves. We provide a brief summary of the reserves and their interest features below.

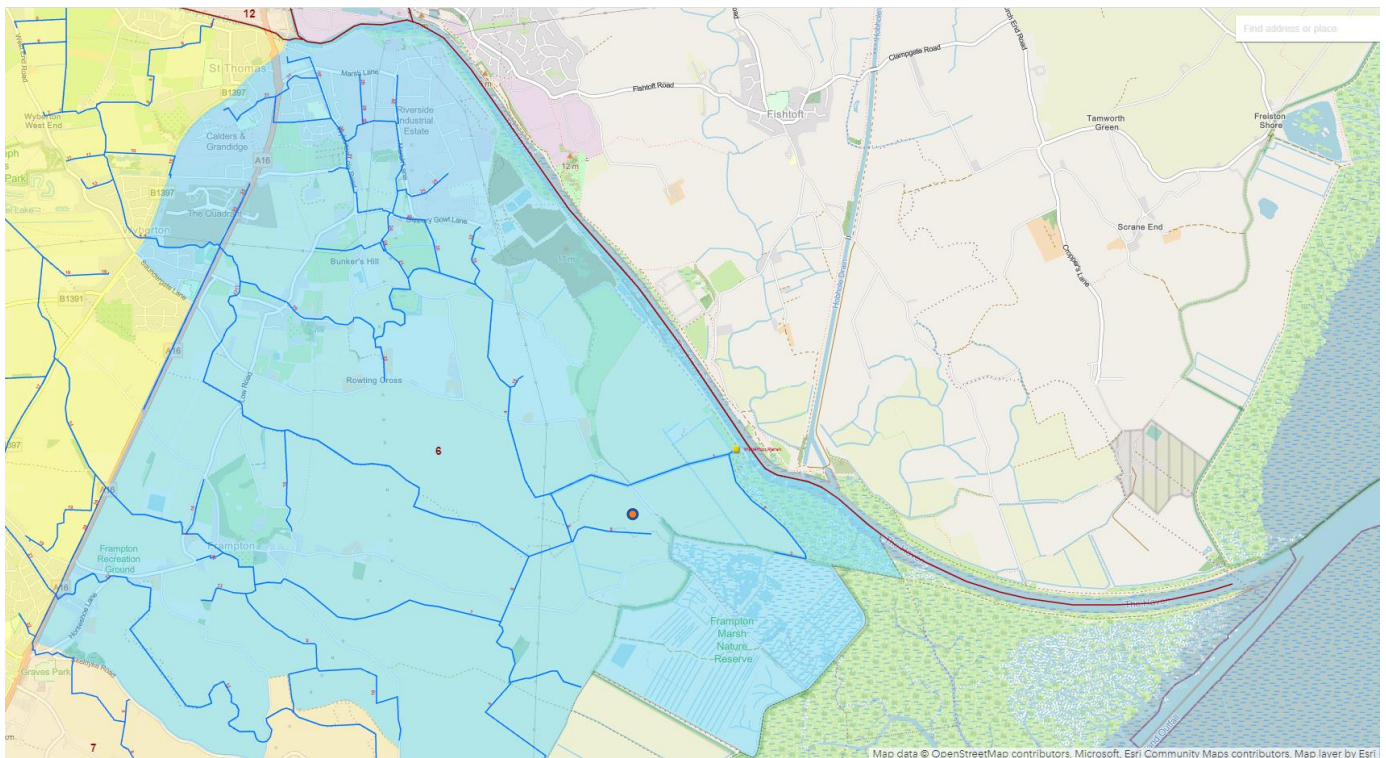


Figure 1: This map shows the drainage network within the Black Sluice Internal Drainage Board (IDB) catchment. Any water discharged from the Application site will enter the drainage network and flow south through the drainage network. The water is automatically pumped into The Haven from Wyberton Marsh (yellow marker). Water is pumped from the drainage network and into Frampton Marsh at the orange marker. Taken from <https://www.blacksluiceidb.gov.uk/about/map-of-district/>

- 1.4 Having read the outline surface water drainage strategy, we have a number of concerns that we request clarity from the Applicant. These are outlined in Table 1 below.
- 1.5 The concerns we have identified are also relevant to understanding the full scale of impact that could arise from the facility during construction and operation on The Wash SPA/Ramsar. The drainage network connects discharges from the application site to The Haven and there is therefore potential for any pollution events or reduction in water quality to affect prey availability and habitat quality of The Haven. This could affect qualifying features of The Wash SPA/Ramsar. The Habitats Regulations Assessment must therefore consider the impact of surface water drainage. It is not clear that this has been factored into the HRA currently undertaken by the Applicant. The HRA will need to be updated to account for any such indirect impacts to ensure all elements of the proposed application have been assessed.

Table 1: The RSPBs initial comments on the Outline Surface Water Drainage Strategy

Ref	Para	Page	RSPB Comment	Recommendation
1	3.1.2	10	The discharge rate is much higher than we understood would be released from the site. At 2.1m <sup>3</sup> /minute this equates to 18,396m <sup>3</sup> a year. That's quite a lot of additional, potentially polluted water, entering the drainage network. It would be good to know what the percentage is in relation to the total volume pumped out. I'm assuming this is about 1,500,000m <sup>3</sup> , which would make it just over 1% extra.	<p>Provide clarity on the additional amount of water that would be discharged compared to the currently pumped total water volume from the drainage network.</p> <p>Ensure this has been assessed within the HRA.</p>
2	3.2.3	10	Does this mean 49% of surface water is lost into the ground? That seems a lot. If this is polluted and by-passes intended filter/capture points and enters the drainage network anyway then this is a concern. We also assuming this represents an additional 18,000m <sup>3</sup> . The full ecological consequences of this infiltration needs to be assessed.	<p>Clarify the volume of water that is planned to be disposed off through infiltration. There also needs to be a monitoring plan available to assess water quality and address issues from contaminants entering the drainage network.</p> <p>Ensure this has been assessed within the HRA.</p>
2	4.1.1	11	Whilst there is no direct discharge into the Haven, it does indirectly once water is discharged to the adjacent drainage network. The drainage network is operated via the IDB and water is automatically pumped into the Haven. This needs to be clarified in the drainage strategy.	Clarify that discharge to The Haven does occur via the drainage network and Wyberton Marsh pumping station.

Ref	Para	Page	RSPB Comment	Recommendation
4	4.3.1	15	From this we infer that the extended or new ditches have an open connection to the IDB drainage network. This would mean that they don't play much of a role in filtering pollutants. This is aside from the concrete car parks, chemical and fuel areas, which do have oil interceptors and storage tanks. Is it possible to have a pollution incident away from these areas that would by-pass these controls and enter the drainage network in an unregulated fashion? If so, we are not convinced that enough measures are being proposed to ensure contaminants will be managed effectively to avoid entering the adjacent drainage network. This will need to be confirmed with the Environment Agency, Natural England and the Black Sluice IDB.	More detail of impacts and consideration of oil separators throughout the site and the need to hydrologically isolate the site and/or create impermeable pools/reservoirs.
5	4.4.5	17	Whilst it is anticipated that there will be sedimentation in the ditches that will trap contaminants there are no measures outlined regarding maintenance. A clear strategy for de-silting that removes the contaminated sediment will be required.	Provision of a maintenance plan for the drainage network to address siltation and contaminated waste.
6	5.1.7	18	Design is to a critical storm of 1 in 100 (also referenced elsewhere). Is this sufficient given the flood defence banks are I believe a minimum of 1 in 200 year of protection?	Discuss with the Environment Agency the need to increase the design parameters to account for a 1 in 200-year event.
7	Not included		The RSPB wants to be informed of any emergencies that could lead to an unregulated discharge into the drainage network as part of the emergency plan, so we can take measures to reduce the risk to our site ecology (i.e. stop abstracting for a while). We therefore request forming part of the stakeholder contacts.	The RSPB to be listed as a contact for any incident plan.
8	Not included		Monitoring of contamination levels from water entering the IDB network. This should be standard practice to inform the success of the design of the discharge operation and, if specified pollutants exceed certain levels, then this will trigger a response to contain contaminants and poor-quality water. We have not seen any information regarding water quality monitoring. Where data are available, we request access to these to ensure that we avoid pumping poor-quality water onto RSPB Frampton Marsh.	A draft water quality monitoring plan to be provided to demonstrate that appropriate data will be recorded to avoid deterioration in water quality within the drainage network.  Monitoring data to be shared with the RSPB and other bodies.

