



**Response to Examining Authorities queries on the  
Unaccompanied Site Investigation  
for the  
Royal Society for the Protection of Birds**

**Submitted for Deadline 3**

**6 December 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. Introduction

- 1.1 At Deadline B (PDB-007) the RSPB suggested that it may be of benefit for the Examining Authority to visit the Tabs Head survey area at the mouth of The Haven. The following information is provided in response to the Rule 17 request for additional information.

## 2. Suggested parking location

- 2.1 The closest parking is located at the Cut End car park, Cut End Road, Fishtoft. TF380391 (Figure 1).
- 2.2 Post codes are misleading and therefore best not relied upon. Coming from Boston in Fishtoft village turn right onto Gaysfield Road (note brown tourism sign on the junction to 'Cut End Road'). Continue straight on, this road becomes Cut End Road. Drive to the end (2.3 miles/3.7km). This is shown on Figure 2. Do not leave anything valuable in the car!
- 2.3 Figure 2 shows the footpath from the Cut End car park to the hide. From the car park, walk up onto the adjacent bank of The Haven and then east (left) along the bank/Haven towards The Wash to the hide (about one mile (1.7km), or 20-minutes walk).

## 3. Location of suggested viewpoints and walking routes to these locations

- 3.1 We have identified key points of interest on Figure 2. We provide some explanation of these viewpoints below:
  - **VP1** – This overlooks the grass fields owned by HMP North Sea Camp. This area supports dark-bellied brent geese and has been proposed as a possible location for compensation by the applicant, as set out in the 'Without Prejudice' derogation case document on compensation measures (REP2-013).
  - **VP2** – View across the mouth of The Haven as it enters The Wash. This area includes the existing rock structures that have been discussed with respect to roosting birds and the adjacent areas of habitat.
  - **VP3** – View from the Cut End bird hide. This hide was used by the Applicant's surveyor to conduct the survey on waterbird disturbance at the mouth of The Haven. The bird hide is a two-story brick building at the mouth of the River (the only building in the area). The top floor is locked and can only be accessed by members of Lincolnshire Bird Club. The bottom storey is freely accessible.

## 4. The location of '... where compensation options may be proposed by the Applicant, ...'. Additionally the Applicant may wish to submit details of these

- 4.1 We have no confirmed locations for the delivery of compensation measures. However, the Applicant has identified that the fields around HMP North Sea Camp are currently being discussed (see VP1 above).

## 5. Elaboration on ‘... an explanation of local context...’

- 5.1 With respect to our comment about understanding the “local context”, this is in relation to the need to appreciate that the numbers of waterbirds present and observable will be dependent on the tidal state and the time of day.
- 5.2 The Haven Mouth is an incredibly dynamic area for birds, varying with factors that include season, time of day, state of tide, wind direction and strength, temperature, disturbance, food availability etc. Usage by birds is therefore very variable, but the Haven mouth represents a unique physical configuration, including the only confluence of two rivers (the Witham and Welland) into the Wash. It also acts as a 'hub' location for many species which pass through, rest or feed there depending on the circumstances. It is disproportionately important for its size and a very important location within The Wash SPA, Ramsar site and SSSI, as well as The Wash & North Norfolk Coast SAC, and it lies between two RSPB Nature Reserves (RSPB Freiston Shore and RSPB Frampton Marsh) with a high degree of bird interchange between these sites. We will provide more detail on this point in our Deadline 4 submissions.

## 6. Elaboration on ‘... of other pressures already acting on The Haven...’

- 6.1 With respect to “other pressures”, the banks of The Haven are used for a range of recreational activities such as walking (with and without dogs) and cycling. There may be additional activity taking place that can cause disturbance. For example, observations by our reserve staff have noted that recreational angling can cause some disturbance, with jet skis and hovercraft using the area infrequently and these can also cause disturbance. Disturbance can also occur from low flying aircraft. However, none of this activity has, as far as we are aware, been assessed and quantified. Such activities will vary according to factors such as, but not limited to, the season, time of day, state of tide, weather (rain, temperature etc) and possibly other factors. We consider it is important to assess any such potentially disturbing activities in-combination with vessel movements along the navigation channel to ensure appropriate conclusions are made in the HRA. We will continue to provide more details on this point at future submissions where it would be helpful to the Examination.

## 7. Location of ‘.. the hide that was used by the surveyor..’

- 7.1 The location of the Cut End hide is provided on Figure 1. Details on the hide are provided in paragraph 3.1 above.

## 8. Details of ‘... the view that could be seen during the surveys..’

- 8.1 Our experience is that the area around the Cut End hide can have waterbirds using it throughout the tidal cycle, and only on the higher spring tides will all the mudflat area be covered by water. Importantly, it is also a chance to understand that the view from the Cut End hide also limits the ability of a single surveyor to document any disturbance effects as vessels move up The Haven. The hide does not have a 360° view. The hide faces ENE out toward The Wash, with side windows facing NW and SE. The view is approximately 200° meaning any vessels that are west of the mouth of the Haven cannot easily be seen from within the hide and therefore any disturbance farther west along the Haven will not be able to be detected from the hide. Scottish Natural Heritage (now NatureScot)

produced a guidance note for survey methods for onshore wind farms<sup>1</sup> that includes vantage point surveys (p.16), which provides helpful information on this point (emphasis added):

#### **“3.8.4 Vantage Point Watch Selection**

*When selecting VPs, the aim should be to cover all of the flight activity survey area such that no point is greater than 2 km from a VP. Any exceptions should be agreed with SNH.*

*It is very important that VPs are chosen to achieve maximum visibility with the minimum number of points. As detection of flight activity will decrease with distance, VPs should be located as close to the survey area as possible. It is important to minimise the observer’s effect on bird behaviour. For this reason VPs are best located outside the survey area where possible. In order to minimise disturbance, VPs should not be located near to sensitive sites for target species, i.e. nest, roost or lek sites. Observers should try to position themselves inconspicuously so as to minimise their effects on bird movements. Care also needs to be taken not to locate observation points in locations that may lie directly between the site and a roost or nest site of a key target species, as this can seriously influence the behaviour of birds to be surveyed*

*Where VPs are located within the survey area, they should not be used simultaneously with other VP locations which overlook them as the presence of an observer either sitting at or moving to/from the VP will probably affect bird behaviour.*

***We recommend scanning an arc of up to 180° from each VP. Larger arcs cannot be scanned efficiently. With proposals for up to three turbines it may be possible to observe the entire survey area from a single VP. In most cases, however, two or more VPs will be required. For example an upland site in Scotland measuring around 10km<sup>2</sup> typically requires three or four VPs.***

***The number of observers required to undertake watches will vary depending on the levels of target bird activity. If activity is predicted to be high and involves several target species, judgement should be exercised as to whether more than one observer may be required, in order that all activity of target species can be recorded.”***

- 8.2 We will provide more detail as appropriate in future submissions on the survey limitations. An appreciation of the hide and its views may be helpful in future discussions on the surveys.

## **9. Submission of a marked up plan of this area would be of great assistance.”**

- 9.1 Figures 1 and 2 provide marked routes to access the Cut End car park and the Cut End bird hide. Suggested viewpoints have been identified.
- 9.2 We hope this note provides sufficient detail at this time to aid the Unaccompanied Site Inspection and addresses the queries raised.

---

<sup>1</sup> Scottish Natural Heritage (2014) Guidance: Recommended bird survey methods to inform impact assessment of onshore wind farms. See: [h](#) [REDACTED]

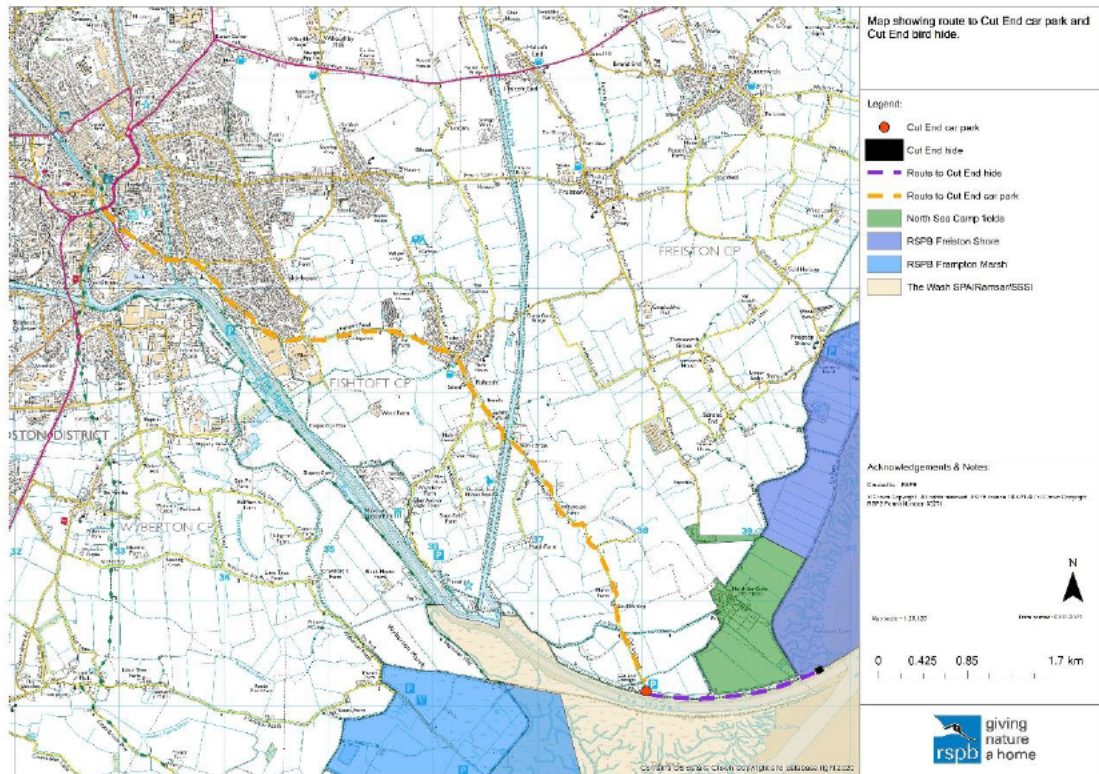


Figure 1: Routes for accessing the Cut End car park and the Cut End bird hide.

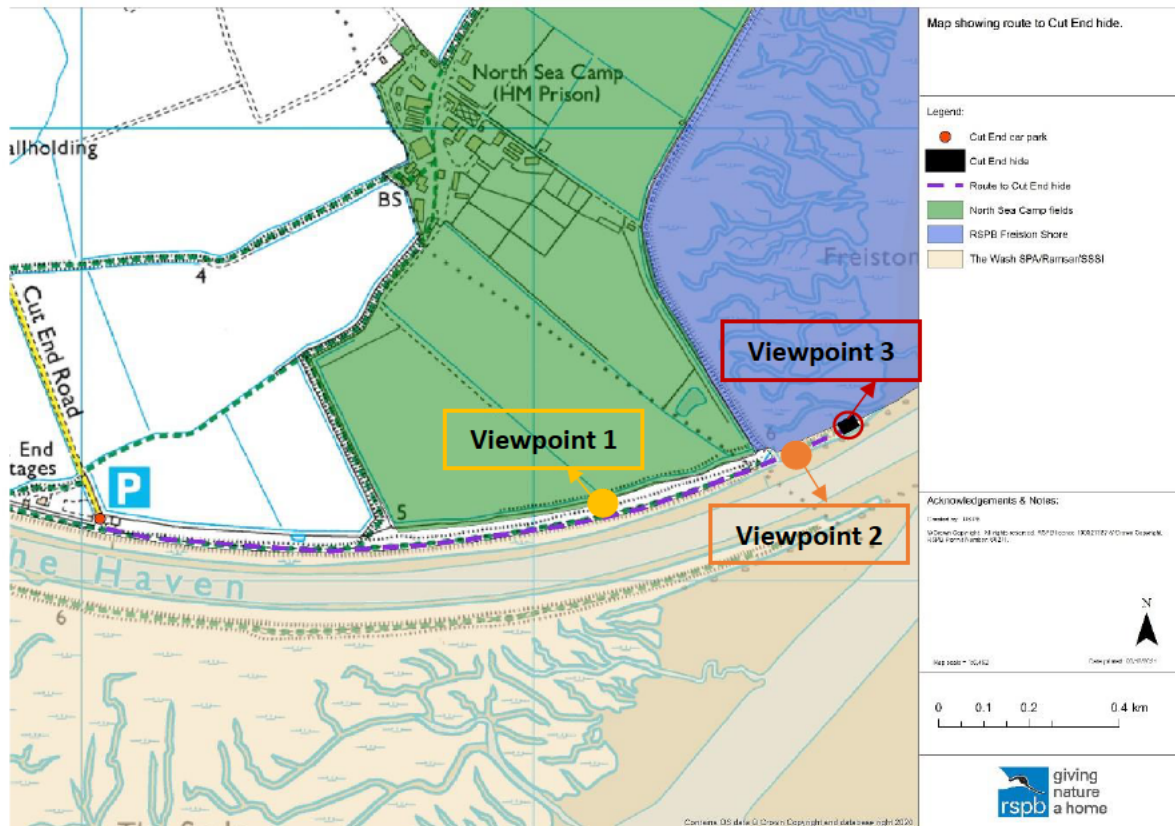


Figure 2: Walking route from the Cut End car park to the Cut End bird hide. It is c.1.7km long. Any waterbird interest along the route will be dependent on the state of tide. More birds will be present as the tide is rising or falling around high tide. However, other factors may affect numbers on any given day.