



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Boston Alternative Energy Facility

Appendix B6 to Natural England's Deadline 8 Submission

**Natural England's Comments on Change in Waterbird Behaviour Report [REP6-034]  
and Technical Note for Navigation Management and Ornithology [REP6-033]**

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

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15th March 2022

## **Natural England's Comments on Change in Waterbird Behaviour Report [REP6-034] and Technical Note for Navigation Management and Ornithology [REP6-033]**

### **Introduction**

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

- 9.71 Change in Waterbird Behaviour Report [REP6-034]
- 9.70 Technical Note for Navigation Management and Ornithology [REP6-033]

### **A: Natural England's Comments on Change in Waterbird Behaviour Report [REP6-034]**

#### **Summary**

Natural England advises that this is a useful piece of work to start to quantify responses to vessel presence and clearly demonstrates that that large cargo vessels cause disturbance responses. However, further survey data is required to provide necessary evidence to support the Application.

#### **Key points:**

- 1) Vessel Disturbance: This document supports Natural England's concerns that vessels entering the Haven displace birds from their roosts, and in some cases foraging grounds both in the Haven and at the Mouth of Haven.
- 2) Impacts of large vessels vs. small vessels: The document supports Natural England's concerns that large cargo vessels are more disturbing than smaller vessels such as pleasure craft; the pilot boats; and fishing boats. And therefore, vessel movements associated with the Application are likely to significantly increase the disturbance to Annex I birds.
- 3) Site network: There is clear documentation of birds swapping between Sites A and B at the development site. This further supports the requirement for any project-specific mitigation measures to provide a local network of sites.
- 4) Disturbance source: Natural England notes that the most significant source of disturbance is the presence of large vessels causing 99.88% of disturbance events at the Mouth of the Haven and 95% at the development site; wake disturbance is secondary.
- 5) Response Behaviour: Please could the Applicant clarify if all birds in attendance to boats were recorded or just those from which a response was noted.

- 6) Disturbance behaviour: Natural England notes that the response varies between species, and not always the same, but the predominant response to the presence of cargo vessels is to abandon roosts and relocate to more distant roost sites. With some birds pushed along the Haven for considerable distances with repeated flushes
- 7) Night time impacts: Natural England notes that only daytime surveys have been undertaken therefore the sensitivity at night is unquantified.
- 8) Disturbance Threshold distances: Natural England advises that disturbance threshold distances should be identified and included within the report.

## **Natural England's Comments on Technical Note for Navigation Management and Ornithology**

### Key points

- 1) Natural England notes that this plan has not been developed in a HRA context but suggest it can and should be adapted.
- 2) Within the document it is suggested that it can be used as a HRA level impact management tool, but there is no evidence that adaptation of vessel movement parameters will mitigate impacts and/or can be secured. Especially as many aspects of vessel movement such as vessel speeds (please see Natural England Deadline 8 Appendix C4) and tides are outside of the projects control.
- 3) Natural England advises that associated plans referenced in the technical note are not currently available and therefore we are unable to provide further advice.
- 4) Natural England is concerned that the Applicant has not set out how the plan would take birds into account, how it could be modified and how appropriate Nature Conservation oversight would be achieved. Until this is provided, we can have no confidence that the impacts can be appropriately managed to suitably minimise the risk to nature conservation.
- 5) Natural England advises that in order to provide the necessary confidence to Secretary of State that the impacts can be mitigated, the Plan could be adapted to address nature conservation concerns, that impacts can be avoided and that the plan can be managed in accordance with statutory requirements.