



THE PLANNING ACT 2008  
THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Boston Alternative Energy Facility

Appendix B9 to Natural England's Deadline 10 Submission

**Natural England's Comments on Final Waterbird Survey Report [REP9-032]**

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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7<sup>th</sup> April 2022

## Natural England's Comments on Final Waterbird Survey Report [REP9-032]

Introduction This document provides Natural England's response in relation to the following documents submitted by the Applicant at Deadline 9:

- Final Waterbird Survey Report [REP9-032]

Natural England note this document is an independent report written for the Applicant rather than a submission produced by them. For this reason, the comments we have provided are at a high level. We advise this report should be appended in the HRA. Also, it would have been preferable to have reviewed this document before, or in tandem, with the submission at Deadline 8 'Final Waterbird Survey Report Summary of Data [REP8-018]'.

### Summary of conclusions:

1. Relevance of report: This report supports the Waterbird Data Report provided at Deadline 8 [REP8-018]. **It should be noted that the data covered here, and in the associated document REP8-018, post-dates the existing HRA, but contains information of relevance to the HRA and should be addressed within it.** This information is of particular relevance to the question of level of risk associated with functional linkage.
2. Survey Effort: Natural England advises that a single season's survey consisting of four high tide and four low tide visits (one visit per month at each tidal state) (Section 3.1) is informative; but we do not consider this a comprehensive level of survey. Though we do recognise that two sectors (westernmost around development site and easternmost around the Mouth of the Haven (MOTH)) overlap areas of previous study. And that the survey area includes part of the Haven which is in the SPA (Easternmost survey section).
3. Importance of the Haven: The report provides some context/clarification on the importance of the Haven and the role it plays in supporting the SPA including 10 species found in notable (>1% of SPA population) levels: dunlin, golden plover, lapwing, oystercatcher, turnstone, brent goose, avocet, gadwall, ruff, redshank) (Section 4.3 discussed at 5.1.1). All of which are contributors to the Waterfowl Assemblage and would be considered at risk from the development due to disturbance along the Haven.
4. The Haven as one functional area: Varying numbers of birds recorded between high and low tide surveys within each month supports the assumption that the different sectors of the Haven are not functionally self-contained (Section 4.2).

However, the report doesn't provide evidence to address the following outstanding evidence gaps, which we advise should be addressed as part of the consenting phase:

5. Directional bird movements: There is no consideration of which birds are moving between the non-SPA and SPA parts of the Haven and which birds move between non-SPA feeding and non-SPA roosting grounds. This information is important when determining the significance of impacts.
6. Nocturnal activities: There is no consideration of the nocturnal use of these areas, which may vary from diurnal use. Thus, the impacts from vessel movements at night can't be determined.
7. Disturbance Pressures: In line with varying populations, risk varies between high and low tide, it is not clear from the report to what extent populations (particularly high tide populations) are influenced by disturbance pressure. Again, this would help determine the scale and the significance of the disturbance impacts.