



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

Boston Alternative Energy Facility

Secretary of State Additional Information Request

**Natural England's updated advice on outstanding concerns in relation to Boston
Alternative Energy Facility**

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

10th March 2023

Natural England response to letter from SoS on 10 Jan 2023 – Outstanding concerns

Natural England notes that we continue to have fundamental concerns with the Application that remain unresolved this relate to:

- 1) Ornithological compensation
- 2) Priority Habitats; and
- 3) England coast path

We have included in this response our current position should these matters remain unresolved

- 1) Bird Compensation and Mitigation

Natural England reflects that while there has been an extension to the determination phase for the BAEF, it is our view that there is insufficient time prior to determination to turn what is currently theoretical/high level proposals with no implementation design plan into compensation measures which are deliverable with any certainty of success in sufficiently offsetting the impacts to **all** species where an AEoI can't be excluded. The fundamental issues relate to the location not being secured and maintaining a 'wetland' with sufficient water. If this was to be through tidal egress this may be more effective and help address impacts to priority saltmarsh. However, that would require further consultation with the EA, MMO and Internal Drainage Boards for additional permits/licences with no guarantee of approval at this time. Therefore, due to the uncertainties in the ecological merits of the proposals, and risks associated with deliverability of any measures we advise that should the SoS be minded granting consent then controls should be put in place potentially through DCO requirements which ensure that compensation measures are sufficiently delivering prior to construction works commencing.

We are also aware having spoken with the RSPB of the challenges they faced with creating successful bird habitats along the margins of The Wash at Freiston and Frampton and we do not envisage the implementation of the compensation for this project being any less challenging. **With no guarantee that the Applicant can deliver the required compensation we strongly advise that compensation must be delivering prior to the commencement of work.**

2) Priority Habitat

It is unclear to Natural England how impacts to priority habitats will be avoided and/or reduced from the proposed activities including creating areas to provide Ornithological mitigation. If the SoS is minded to grant consent then we request that 'implementation plans' must be provided by the Applicant and signed off by the competent authority in consultation with Natural England prior to works commencing.

3) England Coast Path

Natural England notes that there are outstanding concerns in relation to potential implications to the England Coast Path. If the SoS is minded to grant consent then we request that an 'implementation plan' must be provided by the Applicant and signed off by the competent authority in consultation with Natural England prior to works commencing