



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's Comments on White Fronted Geese Survey Report**

Planning Inspectorate Reference: EN010012

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24<sup>th</sup> September 2021

**Natural England's Comments on White Fronted Geese Survey Report [REP5-125]**

- 1.1 A large proportion of the proposed works within the MDS are in close proximity to a number of sensitive designated sites which are either wholly or in part notified for mobile species such as birds (terrestrial and marine species, breeding and non breeding) and marine mammals.
- 1.2 The project therefore presents the potential for noise, visual and light disturbance impacts to these species (and their prey species where relevant) during both construction and operational phases of the project. This relates to land used by birds within the designated site boundaries and also land outside the boundaries but within and around them which can play an important role as 'functionally linked land' (FLL) and are therefore afforded the same protection.
- 1.3 If shown to be required following the noise modelling, measures to avoid, mitigate or compensate for such impacts should be identified. In line with the avoidance-mitigation-compensation hierarchy, this should first consider avoidance measures (e.g. phasing works to avoid the most sensitive times for the relevant species), then mitigation measures (e.g. acoustic screening), then compensation measures (e.g. creation of compensatory habitat elsewhere). Details of how any proposed measures are likely to be effective (e.g. for mitigation measures, how they would reduce noise levels to acceptable levels in the context of the bird disturbance thresholds) should be provided, along with details of how they would be monitored to ensure their efficacy
- 1.4 In our Relevant Representation Natural England stated *"For a development of this scale directly which is directly adjacent to an SPA classified for (among other features) internationally and nationally important non-breeding coastal waterbirds would be expected to have conducted, as a minimum, two complete winters' survey effort, with typically two surveys per month from October to March (24 counts in total). Survey months might be extended to capture any classified populations of passage species present earlier in the autumn or spring. These up-to-date survey data could only then be deemed representative and allow an adequate assessment to be conducted. If reduced survey effort is deemed acceptable, the potentially unrepresentative sample relied upon must be taken into account and treated with an appropriate amount of precaution when determining impact and any potential*

*requirement for mitigation / compensation. Surveys should also be tailored to the individual species' ecology; for example, bearing in mind that the construction site would be active 24 hours a day, nocturnal surveys for white-fronted geese should ideally be undertaken as they are most active outside daylight hours and daytime surveys only may therefore overlook potential impacts."*

- 1.5 Further detailed information can be found within our Written Representation and Statement of common ground under issues 27
- 1.6 Natural England has reviewed the Applicant's Deadline 5 Submission - 9.59 White Fronted Geese Survey Report [REP5-125] and has the following comments.
- 1.7 Natural England was expecting that the nocturnal survey work might have included thermal imaging to determine whether any geese might be present and, if so, their location.
- 1.8 Nevertheless, the acoustic surveys which have been provided confirm that during a survey year in which white-fronted goose numbers nationally were higher than normal, and 600 white-fronted geese were recorded at RSPB North Warren, for the majority of nights no geese were detected and there was no regular movement suggesting the presence of a roost. Natural England therefore has no further concerns in relation to white-fronted geese.