



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

Boston Alternative Energy Facility

Appendix D3 to Natural England's Deadline 5 Submission

Natural England's Advice on Outline Air Quality and Dust Management Plan [REP3-015] and Air Quality Deposition Monitoring Plan [REP4-016]

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

25th January 2022

Natural England’s Advice on Outline Air Quality and Dust Management Plan [REP3-015] and Air Quality Deposition Monitoring Plan [REP4-016]

Introduction

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

- Outline Air Quality and Dust Management Plan [REP3-015]
- Air Quality Deposition Monitoring Plan [REP4-016]

Summary

Natural England’s previous comments raised in our RR/WR [RR-021] remain outstanding and the new information has not addressed these.

Detailed Comments on Air Quality Deposition Monitoring Plan [REP4-016]

	Section/page number	Passage from REP4-016	Comment	RAG status
1.	1.1, pg 1, bullet 1	<i>“The assessment of the impacts of emissions from the Facility upon nitrogen deposition at saltmarsh habitats along The Haven was conducted on a worst-case basis, with the assumption that emissions of nitrogen oxides (NOx) and ammonia (NH3) would be emitted at 100% of their permitted levels.”</i>	NE requests that the Applicant provides further clarification on what is meant by ‘permitted levels’.	
2.	1.1, pg 1, bullet 2	<i>“In reality, as is demonstrated by the emissions monitoring results of all other EfW plants in the UK, typical emissions of NOx are at approximately 80% of the permitted level and NH3 are at around 20% of the permitted level.”</i>	Natural England would welcome the inclusion of modelling outputs in this section to support text.	
3.	1.1, pg 1, bullet 3	<i>“Actual nitrogen deposition levels would, therefore, be lower than those assessed in the updated Environmental Statement Chapter 14 Air Quality (document reference 6.2.14, REP1-006)...”</i>	Natural England queries if the Applicant has up to date modelling of the ‘realistic’ scenario to reflected likely emissions? This should be included within the HRA AA.	

**Detailed comments relating to the Outline Air Quality and Dust Management Plan
[REP3-015]**

	NE Risk and Issues Log Comment	Comment	RAG status
4.	Whilst dust impacts during construction are considered at Havenside LNR; what about on the area of saltmarsh being used for the Habitat Mitigation Area? This needs to be considered.	NE advises that the Applicant is still to confirm that the dust impact mitigation measures and monitoring will also be in place at this receptor site.	
5.	The assessment states that the minor adverse impact identified will be dealt with by monitoring. However, Natural England advises that this is not mitigating the adverse impact and does not negate the impact to sensitive features. What will monitoring be looking to identify? If a significant change occurs, what actions will be taken?	Natural England advises that no mitigation for impacts has been proposed in REP3-015 or REP4-016. Issue outstanding.	
6.	Natural England notes that Table 14-30 presents values during operational phase for The Wash with in-combination contributions of all pollutants above 1% of the relevant annual mean Critical Loads/ Levels. Therefore, we query how impacts will be mitigated for?	Natural England advises that no mitigation for impacts has been proposed in REP3-015 or REP4-016. Issue outstanding.	
7.	"The Facility was not predicted to lead to any significant effects during its operation which would require mitigation measures. As the Facility would be required to operate under the conditions of its Environmental Permit, this is considered to be an adequate mechanism to ensure that significant impacts are not experienced." Natural England queries what mitigation is suggested for designated sites? Only mention monitoring of stacks.	Natural England advises that no mitigation for impacts has been proposed in REP3-015 or REP4-016. Issue outstanding.	