Boston Alternative Energy Facility

Statement of Common Ground between

Alternative Use Boston Projects Limited

and

UK Health Security Agency (UKHSA) (formerly Public Health England)

Planning Inspectorate Reference Number: EN010095

Date: March 2022

Revision: Final

Table of Contents

Table of Tables

Appendices

1 Introduction

1.1 Purpose of the Statement of Common Ground

1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed Boston Alternative Energy Facility (the Facility) made by Alternative Use Boston Projects Limited (AUBP) to the Planning Inspectorate under section 37 of the Planning Act 2008 (Planning Act).

1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application Documents. All documents are available on the Planning Inspectorate website.

1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties named in **Section 1.3**, and where agreement has not been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2 Description of the Proposed Development

1.2.1 The Facility covers 26.8 hectares (ha) and is split in to two components: the area containing operational infrastructure for the Facility (the 'Principal Application Site'); and an area containing habitat mitigation works for wading birds (the 'Habitat Mitigation Area'). The Facility will generate power from Refuse Derived Fuel (RDF) with the 'thermal treatment' process for generating power converting the solid fuel into steam, which is then used to generate power using steam turbine generators. It will have a total gross generating capacity of 102 megawatts electric (MWe) and it will deliver approximately 80 MWe to the National Grid. The Facility will be designed to operate for at least 25 years, after which it may be decommissioned.

1.2.2 The Principal Application Site covers 25.3 ha and is located at the Riverside Industrial Estate, Boston, Lincolnshire. This site is next to the tidal River Witham (known as The Haven) and downstream from the Port of Boston. The Habitat Mitigation Area covers 1.5 ha and is located approximately 170 m to the south east of the Principal Application Site, encompassing an area of saltmarsh and small creeks at the margins of The Haven.

1.2.3 The main elements of the Facility will be:

- Wharf and associated infrastructure (including re-baling facility, workshop, transformer pen and welfare facilities);
- RDF bale storage area, including sealed drainage with automated crane system for transferring bales;
- Conveyor system between the RDF storage area and the RDF bale shredding plant, part of which is open and part of which is under cover;
- Bale shredding plant;
- RDF bunker building;
- Thermal Treatment Plant comprising three separate 34 MWe combustion lines and three stacks;
- Turbine plant comprising three steam turbine generators and make-up water facility;
- Air-cooled condenser structure, transformer pen and associated piping and ductwork;
- Lightweight aggregate (LWA) manufacturing plant comprising four kiln lines, two filter banks with stacks, storage silos, a dedicated berthing point at the wharf, and storage (and drainage) facilities for silt and clay;
- Electrical export infrastructure;
- Two carbon dioxide (CO_2) recovery plants and associated infrastructure;
- Associated site infrastructure, including site roads and car parking, site workshop and storage, security gate, and control room with visitor centre; and
- Habitat mitigation works for Redshank and other bird species comprising of improvements to the existing habitat through the creation of small features such as pools/scrapes and introduction of small boulders within the Habitat Mitigation Area.

1.3 Parties to this Statement of Common Ground

1.3.1 This SoCG has been prepared in respect of the Facility by (1) AUBP, and (2) UK Health Security Agency (UKHSA), together the Parties.

1.3.2 **AUBP** is a privately-owned company, established for the purpose of securing development consent for the Facility and then developing and operating the Facility. The company team has been involved in industrial development at the site in Boston, Lincolnshire since 2004.

1.3.3 **UKHSA** is a government agency in the United Kingdom, responsible since April 2021 for UK-wide public health protection and infectious disease capability, replacing Public Health England. It is an executive agency, sponsored by the Department of Health and Social Care.

1.4 Terminology

1.4.1 In **Table 3-1** in the Issues section of this SoCG:

a) "Agreed" indicates area(s) of agreement; and
b) "Not agreed" indicates a final position for area(s) of disagreement where the resolution of divergent positions will not be possible, and parties agree on this point.

1.4.2 It can be assumed that any matters not specifically referred to in the Issues section of this SoCG are not of material interest or relevance to UKHSA and therefore have not been the subject of any discussions between the Parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to UKHSA.

2 Overview of Previous Engagement

2.1.1 A summary of the meetings and correspondence undertaken between the Parties in relation to the Facility is outlined in **Table 2-1** below, this is also shown in **Appendix A**.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Parties in relation to the issues addressed in this SoCG.

Table 2-1 Engagement activities between AUBP and UKHSA

Date	Form of contact/correspondence	Key topics discussed and key outcomes
4 July 2018	Letter	Letter received from UKHSA regarding Scoping Consultation.
18 April 2018	Email	Email sent to UKHSA announcing the end of Phase Two of the consultation and the beginning of Phase Three, inviting stakeholders to meet in the coming weeks to discuss the proposals in detail.
12 July 2019	Email	Email sent regarding amendments to Appendix 16.1 Supplementary Information to Estuarine Processes in Preliminary Environmental Information Report (PEIR).
12 August 2020	Letter	Letter sent to UKHSA with newsletter.
29 April 2021	Letter	Letter sent to UKHSA with S56 notice.
18 June 2021	Letter from UKHSA to the Planning Inspectorate	Relevant Representation

Date	Form of contact/correspondence	Key topics discussed and key outcomes
7 September 2021	Meeting	Meeting with UKHSA, Environment Agency and Boston Borough Council to discuss air quality related relevant representations.
8 September 2021	Phone Call	Phone call to Electromagnetic Field (EMF) expert around Relevant Representation comments related to EMF.

3 Issues

3.1 Introduction and General Matters

3.1.1 This document sets out the matters which are agreed and not agreed, between the UKHSA and AUBP.

3.1.2 On 17 August 2021, the Examining Authority issued a letter under Section 88 of the Planning Act and Rules 4 and 6 of The Infrastructure Planning (Examination Procedure) Rules 2010 (known as the 'Rule 6 Letter'). Annex E of the Rule 6 Letter set out a request for SoCGs between AUBP and various parties, including UKHSA. For UKHSA the Rule 6 Letter advises that the following issues should be in the SoCG:

a) Air quality;
b) Contaminated land;
c) Electromagnetic fields; and
d) Accidents.

3.1.3 The Rule 6 Letter also advises that all of the SoCGs should cover the Articles and Requirements in the draft DCO and that any Interested Party seeking that an Article or Requirement is reworded should provide the form of words which are being sought in the SoCG.

3.1.4 **Table 3-1** details the matters which are agreed and not agreed between the Parties, including a reference number for each matter.

Table 3-1 Issues (as per UKHSA's Relevant Representation RR-023)

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
1.0 Air quality					
UKHSA 1.1	6.2.14 Chapter 14 Air Quality (APP-052)	Air Quality Assessment	UKHSA requested further assessment on the following topics: • predicted concentrations of dioxins and furans and deposition of pollutants • potential (short-term) impacts associated with abnormal operations. The updated air quality impact assessments indicate that deposition and abnormal operations are unlikely to lead to significant impacts on public health. The Environment Agency will review the assessment approach when an application for an environmental permit is submitted, for which UKHSA is a consultee. In advance of submitting assessments in support of an environmental permit application, the applicant may wish to liaise with the Environment Agency and consider: • Whether updated background intakes derived	A Human Health Risk Assessment (Appendix 14.5, document reference 9.9, REP1-022) has been submitted into the examination, at Deadline 1. This has considered changes in the uptake of dioxins and furans and dioxin-like polychlorinated biphenyls (PCBs), and the effects of metals and dioxins and furans in the food chain. The effect of abnormal operations is typically provided at the Environmental Permitting stage, however an assessment of the air quality effects arising from abnormal emissions scenarios has been provided and submitted into the examination at Deadline 1 (Appendix 14.6 Abnormal Emissions Assessment, document reference 9.10, REP1-023). The points UKHSA have raised with regards to the Environmental Permit will be discussed with the Environment Agency through ongoing consultation.	Agreed

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
			from daily fat intakes are appropriate (noting Mean Daily Intakes are provided in the 2009 Environment Agency report Human health toxicological assessment of contaminants in soil). More recent data describing dietary intake may exist, regarding which it would be prudent to seek advice from the Food Standards Agency • That an absolute worst-case initial screening of individual metals might begin by examining emission at 100% of the group emission limit value (rather than a smaller proportion) • That comparison of metal intakes with health-based standards (such as tolerable daily intakes or index doses) is preferable in a health risk assessment to comparison with background dietary intakes In short, the assessments' conclusions are reassuring, and the approach and modelling will		

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
			be reviewed by the Environment Agency as part of the environmental permit application and updated as necessary. We recommend considering the points above with that in mind as the Environment Agency may consider it necessary to revisit some aspects of the approach. UKHSA is a statutory consultee to the permitting process and would review any accompanying air quality impact assessments and their conclusions.		
UKHSA 1.2	6.2.14 Chapter 14 Air Quality (APP-052)	Air Quality Mitigation Measures	UKHSA suggested mitigation measures for shipping to reduce public exposures to exhaust emissions. UKHSA supported approaches to minimise or mitigate public exposure to non-threshold air pollutants and address inequalities in exposure.	The Applicant considers that further mitigation measures are not required as vessels will not be required to run their auxiliary engines whilst at berth and the contribution of emissions from shipping was predicted to be relatively small. In addition, due to the separation distance between The Haven and the Air Quality Management Areas within Boston, there were no significant contributions at these receptors from vessel movements.	Agreed

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
2.0 Health					
UKHSA 2.1	6.2.22 Chapter 22 Health (APP-060)	Health Methodology	UKHSA requested clarity on the pre-existing health outcomes accounted for when defining relevant population groups.	Clarity on how the relevant groups in the assessment were identified has been provided in the Applicant's response to UKHSA's relevant representation (see Table 1-11, document reference 9.2, REP1-035).	Agreed
UKHSA 2.2	6.2.22 Chapter 22 Health (APP-060)	Health Assessment	UKHSA had the following comments on the health assessment: • UKHSA questioned the sensitivity of general population/vulnerable groups during operation. • UKHSA noted there was no threshold for health effects related to nitrogen dioxide and particulate matter. • UKHSA recommends the public health implications of electromagnetic field exposures is addressed.	Further information on these points has been provided in the Applicant's response to UKHSA's relevant representation (see Table 1-11, document reference 9.2, REP1-035). A note on Electromagnetic Fields was submitted to UKHSA and submitted to the Examination at Deadline 1 (document reference 9.11, REP1-024).	Agreed

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
3.0 Contaminated land					
UKHSA 3.1	6.2.11 Chapter 11 Contaminated Land, Land Use and Hydrogeology (APP-049)	Contaminated Land Mitigation	UKHSA noted the local authority contaminated land officer is consulted on the strategy for site investigations, sampling, and subsequent mitigation.	Noted	Agreed
4.0 Accidents					
UKHSA 4.1	6.2.24 Chapter 24 Major Accidents and Risk Management (APP-062)	Major Accidents and Risk Management Mitigation	UKHSA raises the importance of including a fire prevention plan as part of the Environmental Permit. It is questioned whether this will include fires on ships transporting RDF.	As discussed in Environmental Statement Chapter 24 (*Major Accidents and Risk Management*) (document reference 6.2.24, APP-062) a Fire Prevention Plan will be included as part of the Environmental Permit (EP). Discussions with the Environment Agency have commenced in relation to the EP. With regards to fire prevention on vessels, the Applicant held a meeting with the Maritime and Coastguard Agency (MCA) and Lincolnshire Fire and Rescue on 16th December 2021. The MCA stated that all vessels will require the appropriate firefighting capability, i.e. needing to conform to the Safety of Life at Sea	Agreed

SoCG Reference	Document Reference	Topic	UKHSA's Comment	AUBP Response	Status
				(SOLAS) Regulations. They identified that the Refuse Derived Fuel (RDF) would need to be checked to see if it conforms to the definition of dangerous goods and that all cargo requires the relevant safety data sheet with declarations made in advance of sailing. All of this is the responsibility of the ship's Master. No specific concerns relating to a fire plan outside of these regulations was identified by the MCA. Lincolnshire Fire and Rescue identified that if a vessel fire occurred within The Haven an Integrated Risk Management Plan (IRMP) would be put in place with a multi-agency response, and liaison with the Port of Boston taking place to determine the best course of action. It was concluded that no specific fire prevention plan for vessels would be needed.	

4 Agreement of this Statement of Common Ground

4.1 Statement of Common Ground

4.1.1 This Statement of Common Ground has been prepared and agreed by the Parties.

Sign 

Paul Salmon
Project Manager for the Boston Alternative Energy Facility on behalf of Alternative Use Boston Projects Limited
Date: 09/03/22

Agreement from UKHSA shown in **Appendix C**.

Appendix A Previous Engagement

Public Health England

CRCE/NSIP Consultations
Chilton
Didcot
Oxfordshire OX11 0RQ

www.gov.uk/phe

Ms Gail Boyle
Senior EIA and Land Rights Advisor
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref: EN010097-000002
Our Ref: 45977

4th July 2018

Dear Gail

Nationally Significant Infrastructure Project
Boston Alternative Energy Facility Scoping Consultation

Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on the proposed scope of the applicant's Environmental Impact Assessment at this stage of the project. Our response focuses on health protection issues relating to chemicals and radiation.

A copy of PHE's standard recommendations regarding the content of the promoter's Environmental Impact Assessment (EIA) is appended to this letter. Further to those recommendations, we request the promotor considers the following points:

- Evaluation of potential impacts associated with non-ionising radiation (EMF) is not mentioned within the proposed EIA scope and should be considered.

In relation to air quality:

The applicant intends to define baseline conditions using local authority annual reports and Defra national modelling. It is proposed that the Boston Biomass Facility stack is included in the promoter's dispersion model, but potential emissions from other planned facilities nearby are not mentioned – modelling assessments must account for their emissions and/or raised background concentrations.

- Given that there are several nearby waste facilities undergoing construction, it is important to address all of their future contributions (ie, emissions associated with stack, fugitive and transport sources) to local air pollution to ensure predicted background pollutant levels are representative

- The applicant states that fugitive operational emissions of dust and particulate matter during construction will be considered but assessment of these emissions at the operational phase is not mentioned. Emissions associated

with storage, handling and treatment of waste, ash and aggregates during the operation phase should be considered within the scoping stage.

- The air quality impact assessment should include evaluation of the combined impact from all emission sources on short and long-term air quality (ie, a combined assessment of the operational traffic (road and shipping) emissions, installation (stack and fugitive) emissions, and emissions from nearby facilities). Each component should not be assessed in isolation, and, for example, if detailed assessment of traffic emissions (road or ship) is screened out, the contribution of road/ship traffic to the installation's overall air quality impacts should not be excluded.

- There are public health benefits in reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards: as such, we recommend consideration of mitigation measures that reduce public exposures to pollutant levels as low as reasonably practicable, and that the applicant's proposed air quality management plan recognises this important principle

    - Mitigation of air quality impacts associated with approximately 560 ship movements per year related to the project could include consideration of shore to ship power supplies, preferably using renewable energy generated to reduce noise and emissions to air associated with ships at berth.

- Fires at unregulated waste sites are a recognised issue with implications for public health. Incineration, although removing the problem, does not increase waste reduction or reuse as part of the waste hierarchy. As part of the EIA, the promoter may wish to evaluate the wider benefits that can be associated with generating electricity and aggregate at their proposed plant.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the ES. PHE however believes the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

We hope that the above is useful but should you have any questions or concerns please do not hesitate to contact us.

Yours sincerely

Jim Stewart-Evans
Principal Environmental Public Health Scientist
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA[1]. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES[2].

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and

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[1] Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: http://webarchive.nationalarchives.gov.uk/20100410180038/http:/communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/

[2] DCLG guidance, 1999 http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf

traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
    - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
    - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken. PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air
When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water
When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality
We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report. Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed[3] and the potential impact on nearby receptors and control and mitigation measures should be outlined.
Relevant areas outlined in the Government's Good Practice Guide for EIA include:

[3] Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

For wastes delivered to the installation:

- the EIA should consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report[4], jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be

[4] Available from: http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf

negligible." PHE supports the inclusion of this information within EIAs as good practice.

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

[redacted]

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

[redacted]

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m^{-1} (kilovolts per metre) and 100 μT (microtesla). The reference level for magnetic fields changes to 200 μT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

http://www.emfs.info/policy/sage/

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Annex 1

Human health risk assessment (chemical pollutants)
The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach[5] is used

[5] Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

From: [redacted]
Bcc:

Subject: Boston Alternative Energy Facility Preliminary Environmental Information Report - Amendment to Appendix 16.1
Date: 12 July 2019 14:51:11

Dear all,

We are writing to you to inform you that there was an error with one of the Appendices in the Preliminary Environmental Information Report for the Boston Alternative Energy Facility.

This affected Appendix 16.1 - Supplementary Information to Estuarine Processes.

We have now provided the correct Appendix 16.1, which can be found here: https://www.bostonaef.co.uk/peir-docs/Appendices/Chapter-16/Appendix%2016.1%20Supplementary%20Information%20to%20Estuarine%20Processes.pdf

Many apologies for any inconvenience caused.

Kind regards

Bethan Griffiths
On behalf of Alternative Use Boston Projects Ltd

From:	consultation@bostonaef.co.uk
To:	nsipconsultation@phe.gov.uk
Subject:	S42: Boston Alternative Energy Facility
Date:	11 August 2020 17:29:30
Attachments:	Leaflet- Boston Alternative Energy Facility.pdf BAEF - Phase 4 - Letter to Public Health England.pdf

Dear Sir / Madam,

Please find attached a letter about the proposed Boston Alternative Energy Facility, together with the newsletter.

Kind regards,

Kelly Linay
On behalf of Alternative Use Boston Projects Ltd

11 August 2020

Sent by email

nsipconsultation@phe.gov.uk

Dear Sir / Madam,

Boston Alternative Energy Facility – Phase 4 Consultation

I am writing to you on behalf of Alternative Use Boston Projects Ltd to update you about our proposal for the Boston Alternative Energy Facility (the Facility), a state-of-the-art power-generation plant located south of Boston, on the Riverside Industrial Estate, next to The Haven.

The Facility is classed as a Nationally Significant Infrastructure Project (NSIP) for which Alternative Use Boston Projects Limited will submit an application to the Planning Inspectorate (PINS) for a Development Consent Order (DCO).

As you may recall from our previous letters, we have undertaken three phases of public consultation about the proposals for the Facility. Phase 3 statutory consultation took place in June and July 2019 and since then there have been some changes proposed to the project. These are due to several reasons including a project review and ongoing iterative design work, feedback received during the earlier consultations, and input from specialist bodies. As a result of this, we are now undertaking an additional round of consultation (Phase 4) which refers to the changes made to the proposals since the Phase 3 consultation.

The proposed Facility remains an Energy from Waste (EfW) facility, although the technology used to treat the waste has now switched from gasification to traditional EfW technology. We have summarised this change and others in the attached newsletter which is being delivered to local residents and businesses. The changes are anticipated to have minor effects, resulting in an overall reduction in potential negative impacts.

We remain committed to open and honest two-way engagement and consultation. Due to the Covid-19 pandemic, we are unable to hold face-to-face meetings as we have for previous phases of consultation. Instead, we are organising online stakeholder meetings via Zoom and would be very happy to arrange a meeting with you if you would find this helpful. Please email consultation@bostonaef.co.uk if you would like us to arrange a meeting.

The newsletter also explains that instead of holding public exhibitions for this phase of the consultation, in order to ensure that people's questions can be answered, the Applicant is hosting two webinars and, for those without access to a computer, a telephone surgery. The webinars have been arranged for 12.00 pm on Tuesday 11 August and Thursday 20 August, while the telephone surgeries will take place on Wednesday 26 August. You are, of course, very welcome to join us at the

webinar on 20 August or the telephone surgeries and you can book a place using the contact details set out at the end of this notice if you wish to attend.

How to provide comments and sign-up for the information events

The consultation period in respect of the proposed Facility will run from 10 August 2020 until 10 September 2020 (inclusive). **The deadline for receipt of your views and comments is 11.59 pm on 10 September 2020.**

You can provide your comments via the channels below:

On the project website: [redacted]k by completing the online comments form or the phase four online survey: [redacted]

By email: [redacted]

By Freepost: Boston Alternative Energy Facility, RTLY-RLGH-GKSE, FREEPOST, 25 Priestgate, Peterborough, PE1 1JL

By Freephone: 0800 0014 050 – where you can request a hard copy of the feedback form.

You can also sign-up for the webinars or the telephone surgery by email, Freepost or Freephone.

Please ensure you include your name and address when making a response. Personal details will not be shared, but any comments made may be made public as part of the consultation.

We welcome your feedback on the proposed changes to help us as we begin to finalise our proposal before we submit the application for a DCO later this year. Following submission of the Application there will be a further opportunity to make representations on the proposals and to engage during the Examination process.

Further information about the project can be found on our website [redacted]

Yours sincerely,

Kelly Linay

On behalf of Alternative Use Boston Projects Ltd

BOSTON ALTERNATIVE ENERGY FACILITY

PROJECT UPDATE – JULY 2020

Welcome to this update on the Boston Alternative Energy Facility.

THE SCHEME

The proposed Boston Alternative Energy Facility (the Facility) will be a state-of-the-art power-generation facility located south of Boston, Lincolnshire on the Riverside Industrial Estate, next to The Haven.

he Facility is classed as a Nationally Significant Infrastructure Project (NSIP) for which Alternative Use Boston Projects Limited (the Applicant) will submit an application to the Planning Inspectorate (PINS) for a Development Consent Order (DCO)

he Facility will generate 02 megawatts (MW) of renewable energy of which 80MW will be exported to the National Grid with the rest used for the running of the Facility his energy will be generated by processing approximately one million tonnes of refuse derived fuel (RDF – derived from non-recyclable waste) per year his will generate power that is equivalent to the annual power demand of more than 206 000 homes (roughly 66% of the number of households in Lincolnshire)

PROJECT UPDATE AND YOUR VIEWS

We last undertook public consultation (Phase 3) on the proposals in June and July 2019. Copies of the documents provided for that consultation, including the Preliminary Environmental Information Report (PEIR), are available on the project website: **www.bostonaef.co.uk**.

Since the Phase 3 consultation there have been changes proposed to the project hese are due to several reasons including a project review and ongoing iterative design work the feedback received during earlier consultations and input from specialist bodies Because of this we are undertaking an additional round of consultation (Phase 4) of which this newsletter forms part of

his newsletter provides an overview of the changes made since the previous consultation and provides preliminary information on the impact of those changes he Phase 4 consultation only refers to the changes made to the proposal since the Phase 3 consultation

he Facility remains an Energy from Waste (EfW) facility although the technology used to treat the waste has now switched from gasification to traditional EfW technology We have summarised this change and others later on in this document he changes are anticipated to have minor effects resulting in an overall reduction in potential negative impacts

We welcome your feedback on these changes to help us as we begin to finalise our proposal before we submit the application for a DCO later this year We also welcome any questions you might have on the changes to the proposed scheme We detail how you can ask questions and share feedback at the end of this newsletter

Following submission of the Application there will be a further opportunity for any person to make representations on the proposals and to engage during the Examination process

Site Layout

CHANGES DURING CONSTRUCTION

Previous Proposal

CONCRETE TRANSPORTED BY ROAD

High volumes of concrete were needed to be supplied to the site in the early stages of construction to construct the six large silos (each were 48 000m3) for storing processed RDF

his was to be transported by road he predicted construction traffic comprised 26 separate weeks where the number of HGV movements would exceed 0 per hour (all within the first 8 months of construction) this included 5 weeks where the number exceeded 5 per hour and seven weeks exceeding 20 per hour he peak was at 4 movements per hour at the beginning of the second year of construction

Project Change

CONCRETE BATCHING PLANT ON SITE

he six concrete silos are no longer required because there is no need to process and store the RDF before the EfW thermal treatment process

here will be a concrete batching plant on site he raw materials for making concrete can be transported in larger quantities thus **reducing vehicle movements** he predicted construction traffic comprises only two separate weeks where the number of HGV movements exceeds 0 per hour peaking at 5 movements per hour mid-way through year two of construction

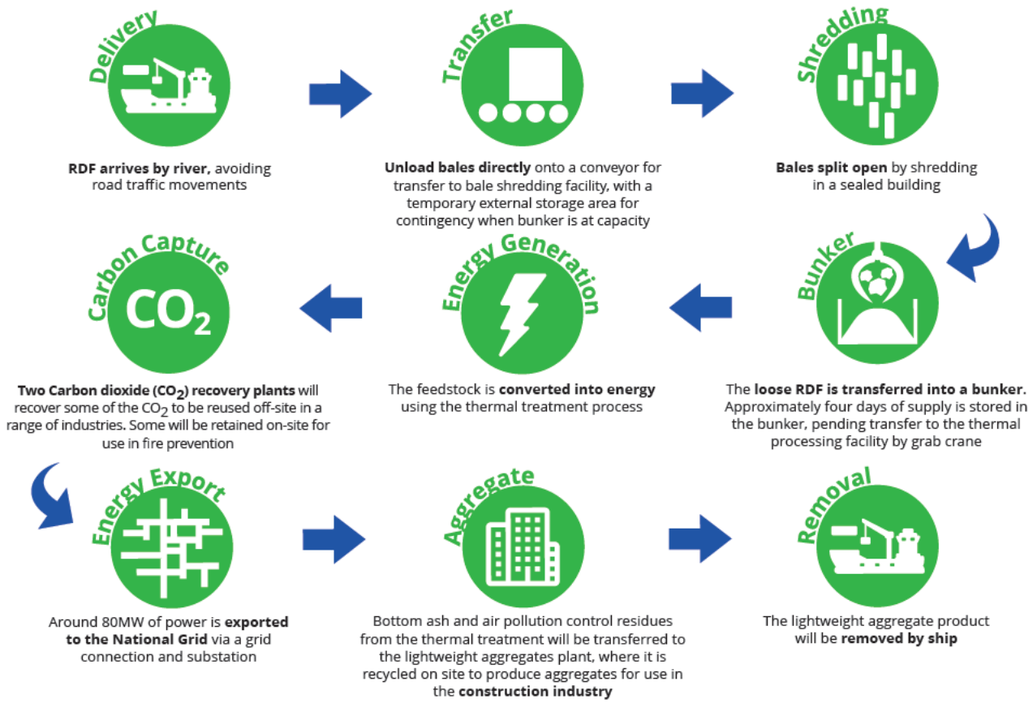
However 40% of these movements in the peak week will be within the site boundary 7% will be movements on local private roads next to the site within the industrial estate and 43% of movements outside the local area

o reduce road transport movements there will also be delivery of aggregate (for making concrete) via ship o make this possible **an early part of the wharf** at the site will be constructed to allow ships to deliver raw materials whilst the site is being constructed

It is estimated that 32 shipments of aggregate would be required over the construction period

CHANGES DURING OPERATION

The process is as follows:



SUPPLY OF FEEDSTOCK (RDF)

Previous Proposal

QUANTITY

A worst-case estimate required 5 million tonnes of RDF to be supplied to the Facility his was required to allow for wide variations in the calorific value of the incoming RDF Gasification facilities require input material to be within a very narrow specification range hence the previous requirement to have a large RDF processing plant on site to process material to the required specification and remove material such as metals glass and stone for off-site recycling or recovery

SOURCE

Previously the RDF was to be largely sourced from facilities that process household and other municipal type waste to remove potential recyclate he residual non-recyclable output from these facilities is processed into RDF

All RDF was to be supplied in bales

RDF SUPPLY FROM THREE PORTS

Previously the RDF was expected to be transported (by ship) from three UK ports on the east coast

Project Change

QUANTITY

A worst-case estimate requires 2 million tonnes of RDF to be supplied to the Facility his reduction is possible because conventional EfW is less sensitive to wide variations in the calorific value of the incoming RDF herefore the EfW facility does not need to have a large RDF processing plant on site

he reduction will mean the number of RDF shipments to site could be reduced by up to 20 per year

SOURCE

he RDF will still be sourced from residual waste from materials recycling facilities he specification for the RDF remains unchanged

All RDF will be received by ship in bales

RDF SUPPLY FROM SEVERAL PORTS

he RDF supply is now expected to come from a wider range of UK ports (approximately from across the UK – none of the waste received will be sourced from outside the UK)

Example EfW facility already constructed using the proposed EfW technology provider

RDF HANDLING

Previous Proposal

BALES OFFLOADED FROM SHIPS ON TRAILERS AND TRANSPORTED TO A STORAGE AREA AT THE WHARF

here was one crane at each berth for offloading RDF bales

Cranes were to offload bales and these were to be removed to the external bale storage area by trailer

Approximately four days of supply (just over 2 000 tonnes) was anticipated to be temporarily stored at the wharf in an uncovered area of approximately one hectare

Example EfW facility already constructed using the proposed EfW technology provider

Project Change

BALES WILL BE DIRECTLY OFFLOADED FROM SHIPS ONTO A CONVEYOR FOR TRANSFER TO A BUNKER.

Some contingency storage is required at the wharf, but a reduced area of external storage is required.

wo cranes per berth to **reduce the time taken** to offload the bales

Automated cranes will be used for offloading the ships to reduce operator fatigue

Bales will be **directly loaded** onto the conveyors for transfer to the bunker building

- he RDF bunker has approximately four days of supply
- A temporary external storage area will still be required at the wharf for contingency for when the bunker is full his will contain approximately two days of supply thus reducing the number of bales stored outside (and the storage area) by around 50%

RDF PROCESSING

Previous Proposal

LARGE RDF PROCESSING FACILITY

A large RDF processing facility (35m x 94m x 20m high) was required for separating out items that were not suitable for the gasification process but were potentially recyclable

hese recyclable items (approximately 300 000 tonnes per annum) were segregated into recyclable waste streams (ferrous and non-ferrous metal glass medium and high-density inert material such as stones) hese materials were to be transported off-site by HGV

Processed RDF stored in six large 48 000m³ silos pending gasification

Project Change

BALE SHREDDING FACILITY, NO PRE-PROCESSING

Bales will be conveyed to a small shredding facility (footprint 8m x 5m) to remove the bale wrap and reduce the particle size

- No silos are required
- here will be no segregation prior to thermal treatment
- here is no requirement for HGV movements to remove segregated material off site
- here is increased space on site by removing the RDF processing building which delivers a simpler and more efficient layout and allows for safer construction

KEY MESSAGES AND OUTCOMES

RDF SUPPLY

All RDF supplied will be from UK based sources this has not changed his reduces the amount of RDF to be exported to Europe or taken to landfill

 he amount of RDF required is less compared to gasification because the EfW system is not as sensitive to variations in the calorific value of the RDF his means fewer ship movements are required each year

RDF STORAGE AND ODOUR

 he amount of RDF stored outside will be reduced to between 25% and 50% of the previous requirement

 he internal bunker storage is a fully enclosed building with the air over the shredded RDF continually extracted and fed into the thermal treatment process for use as combustion air herefore all odours will be treated at a high temperature (850°C) and will not be released

VEHICLE MOVEMENTS

During construction – a concrete batching plant on site and deliveries of aggregate via ship has reduced road vehicle movements

During operation - vehicle movements are significantly reduced because there is no need to segregate material before the thermal process and take it off site

THERMAL TREATMENT

Energy Generation

Previous Proposal

GASIFICATION TECHNOLOGY

- Gasification technology was proposed
- hree individual gasification units formed the total thermal treatment system (a three line system)
- Each line had a stack but this was combined in one large stack approximately 5m in width with three cores within estimated to be 70m in height

Project Change

THERMAL TREATMENT (ENERGY FROM WASTE) TECHNOLOGY

- hermal reatment (Energy from Waste) technology (still three lines) See enclosed images for typical EfW facilities
- Emissions for the EfW will have to comply with the same standards as for Gasification New (more stringent) standards were issued in December 20 9 he EfW facility will have to comply with these standards which will be controlled through an environmental permit issued by the Environment Agency
- he reconfiguration has allowed for repositioning of the air cooled condenser (ACC) and turbine buildings to a central point which could **reduce noise impact** from the site
- hree lines but one individual stack per line these stacks will be the same height (currently estimated to be 70m) but narrower than the previous design
- he EfW building is slightly taller (by approximately 4-6m)
- here will also be more cladding around the main EfW building which is likely to **reduce the noise impact**
- A greater amount of ash (and therefore ash processing) will be ground and sent to the on-site Lightweight Aggregate (LWA) Facility **Around 10% more aggregate would be produced and transported off-site via ship for use in the construction industry**

CARBON CAPTURE

Carbon Capture CO_2

Previous Proposal

ONE CARBON DIOXIDE CAPTURE UNIT

Project Change

TWO CARBON DIOXIDE CAPTURE UNITS

KEY MESSAGES AND OUTCOMES

LANDSCAPE ASSESSMENT

 here will be an updated Landscape and Visual Impact Assessment to account for the change in scheme design

AIR QUALITY

 he EfW will be required to comply with the same stringent industry standard limits on emissions as the gasification facility

 wice as much carbon dioxide will be captured thus lowering emissions

VEHICLE MOVEMENTS

 here will be a reduction in the number of HGV movements in operation compared to previously because the facility does not need to segregate metals and inert material from the RDF before thermal treatment

POWER OUTPUT

Power output will remain the same

A typical Thermal Treatment (Energy from Waste) facility

OTHER PROJECT CHANGES

PUBLIC FOOTPATH

A public footpath currently runs along the Roman Bank embankment running through the site At present there is a gap within the embankment Previously the plan was to route pedestrians down across the gap safely and back up the bank Instead we are now proposing a footbridge over the gap in the bank

UPDATED TIMESCALES

Boston timeline

1 SEPTEMBER 2018 – PHASE 1
Informal non-statutory pre-application consultation introducing the project and seeking feedback

2 FEBRUARY 2019 – PHASE 2
Informal non-statutory pre-application consultation updating on progress on the project inviting further feedback

3 JUNE TO AUGUST 2019 – PHASE 3
Formal statutory consultation he Preliminary Environmental Information Report (PEIR) was presented and further feedback was invited

WE ARE HERE

4 JULY – AUGUST 2020 – PHASE 4
Informal non-statutory pre-application consultation updating on changes to the project and inviting feedback

5 Q3 – Q4 2020
Review feedback from pre-application consultation before submitting an application for a Development Consent Order (DCO) to the Planning Inspectorate

6 AFTER THE APPLICATION IS ACCEPTED, there will be a further opportunity for any person to register as an interested party and make representations on the proposals and to engage during the examination process Following the examination the Planning Inspectorate will report on the examination of the application taking into consideration all relevant matters including representations from interested parties and make a recommendation to the Secretary of State for Business Energy and Industrial Strategy about whether to grant or refuse the DCO

7 THE SECRETARY OF STATE FOR BUSINESS, ENERGY AND INDUSTRIAL STRATEGY
is responsible for making the final DCO decision

As this is a complex decision-making process it can take 6 months or more from acceptance of the DCO application to the final decision Following approval the Facility will take approximately four years to construct and commission

he construction period will begin when the relevant pre-construction requirements have been completed hese will be identified in the decision made by the Secretary of State

WEBINARS

Due to the Covid-19 pandemic, we're unable to hold public exhibitions as we have for previous phases of consultation. Instead we're hosting two webinars and for those without access to a computer we are offering a telephone surgery. As for phases 2 and 3 we have delivered this newsletter to all homes and businesses in the Boston Borough Council area. Details of when the webinars and telephone surgery are taking place are detailed below. Please book your place using the feedback mechanisms listed below.

WEBINARS

Each session will last between -2 hours depending on the number of questions from the public hese are taking place on

WEBINAR 1	WEBINAR 2
Tuesday	Thursday
11 August at 12pm	20 August at 12pm

TELEPHONE SURGERY

hese are 5 minute slots where you can speak directly with a member of the project team his is by appointment only An additional session will be arranged if this date becomes fully booked

WEDNESDAY 26 AUGUST
10am until 4.30pm

HOW TO CONTACT US

By email: consultation@bostonaef.co.uk

By telephone: 0800 0014 050

By Freepost:
Boston Alternative Energy Facility
R LY-RLGH-GKSE
Freepost
25 Priestgate Peterborough PE JL

o review further information about the Facility please visit our project website
www.bostonaef.co.uk

baef
Boston Alternative Energy Facility

Boston Alternative Energy Facility
RTLY-RLGH-GKSE
FREEPOST
25 Priestgate
Peterborough
PE1 1JL

29 April 2021

Dear ,

Development Consent Order for Boston Alternative Energy Facility submitted and accepted by the Planning Inspectorate

On 20 April 2021, the Planning Inspectorate ("PINS") (on behalf of the Secretary of State) accepted for examination the application by Alternative Use Boston Projects Limited for a Development Consent Order ("DCO") to construct and operate a new energy from waste facility in Boston, Lincolnshire (Boston Alternative Energy Facility).

In accordance with the relevant legal requirements, we are writing to specified organisations notifying them of this fact. Notices have been put up around the site and formal newspaper notices have been published in local and national press.

Enclosed with this letter is a copy of the notice made under section 56(2) of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations of acceptance of an application for a DCO ("Section 56 Notice") and a USB stick pre-loaded with copies of all the DCO application documents, plans and maps (including a copy of a map showing the location of the Boston Alternative Energy Facility, the draft DCO and the Environmental Statement).

The site for the proposed Facility is located substantially within the Riverside Industrial Estate to the south of Boston town centre. The Facility includes the following main elements:

- wharf and associated infrastructure (including re-baling facility, workshop, transformer pen and welfare facilities);
- Refuse Derived Fuel (RDF) bale storage area, including sealed drainage with automated crane system for transferring bales;
- conveyor system between the RDF storage area and the RDF bale shredding plant, part of which is open and part of which is under cover;
- bale shredding plant;
- RDF bunker building;
- Thermal Treatment Plant comprising three separate 34 Mega Watt electrical (MWe) combustion lines and three stacks;

- turbine plant comprising three steam turbine generators and make-up water facility;
- air-cooled condenser structure, transformer pen and associated piping and ductwork;
- lightweight aggregate manufacturing plant comprising four kiln lines, two filter banks with stacks, storage silos, a dedicated berthing point at the wharf, and storage (and drainage) facilities for silt and clay;
- electrical export infrastructure;
- two carbon dioxide (CO_2) recovery plants and associated infrastructure;
- associated site infrastructure, including site roads and car parking, site workshop and storage, security gate, and control room with visitor centre; and
- habitat mitigation works for Redshank and other bird species comprising of improvements to the existing habitat through the creation of small features such as pools/scrapes and introduction of small boulders within a Habitat Mitigation Area.

The Section 56 Notice includes details of how to register with PINS as an interested party with regards to the Application under the section 'Making representations about the proposed DCO'.

For further information on Boston Alternative Energy Facility, please visit [redacted]

Yours faithfully,

[redacted]

Kelly Linay
On behalf of Alternative Use Boston Projects Ltd
[redacted]

SECTION 56(2) PLANNING ACT 2008

REGULATION 8, THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009 (AS AMENDED)

REGULATION 16, THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED)

NOTICE OF ACCEPTANCE OF AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER

PROPOSED BOSTON ALTERNATIVE ENERGY FACILITY DEVELOPMENT CONSENT ORDER

(PLANNING INSPECTORATE REFERENCE: EN010095)

Notice is hereby given that the Secretary of State for Business, Energy and Industrial Strategy has accepted an application made by Alternative Use Boston Projects Ltd ("the Applicant") of 26 Church Street, Bishop's Stortford, Hertfordshire, CM23 2LY (Company Number 11013830), under Section 37 of the Planning Act 2008 ("the Application") for a Development Consent Order ("DCO"). The Application was submitted by the Applicant on 23 March 2021 and accepted for examination on 20 April 2021. The Planning Inspectorate reference number is EN010095.

The Proposed Development will authorise the construction, operation and maintenance of a power-generation plant, known as the Boston Alternative Energy Facility, substantially within the Riverside Industrial Estate, Boston, Lincolnshire ("the Proposed Development").

The Applicant is now required—

- by section 56(6) of the Planning Act 2008 to make available to persons/bodies specified under that section a copy of the application and the documents and information that accompanied it;
- by Regulation 8(2)(e) of the Infrastructure Planning (Applications: Prescribed Forms And Procedure) Regulations 2009 (As Amended) to include a map showing the location of the Proposed Development; and
- under Regulation 16(2)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to send a copy of the accepted application, a map showing where the proposed development is to be sited, and a copy of the environmental statement, to all of those bodies who qualify as a "consultation body" under Regulation 3(1) of those Regulations.

A copy of the location map required to be included with this Notice and of all the other application documents are contained on the enclosed USB stick.

<u>Summary of the Proposed Development</u>

The Proposed Development would comprise—

- a wharf and associated infrastructure (including re-baling facility, workshop, transformer pen and welfare facilities);
- a refuse derived fuel ("RDF") bale contingency storage area, including sealed drainage, with automated crane system for transferring bales;

- conveyor system running in parallel to the wharf between the RDF storage area and the RDF bale shredding plant. Part of the conveyor system is open and part of which is under cover (including thermal cameras);
- a bale shredding plant;
- a RDF bunker building;
- a thermal treatment plant comprising three nominal 34 MWe (megawatts electrical) combustion lines (circa 120 MWth (megawatts thermal)) and associated ductwork and piping, transformer pens, diesel generators, three stacks, ash silos and ash transfer network; and air pollution control residues ("APCr") silo and transfer network;
- a turbine plant comprising three steam turbine generators, make-up water facility and associated piping and ductwork;
- an air-cooled condenser structure, transformer pen and associated piping and ductwork;
- a Lightweight Aggregate ("LWA") manufacturing plant comprising four kiln lines, two filter banks with stacks, storage silos for incoming ash, APCr, and binder material (clay and silt), a dedicated berthing point at the wharf, silt storage and drainage facility, clay storage and drainage facility, LWA workshop, interceptor tank, LWA control room, aggregate storage facility and plant for loading aggregate / offloading clay or silt;
- electrical export infrastructure;
- two carbon dioxide (CO_2) recovery plants and associated infrastructure, including chiller units;
- associated site infrastructure, including site roads, pedestrian routes, car parking, site workshop and storage, security gate, control room with visitor centre and site weighbridge; and
- habitat mitigation works for Redshank and other bird species comprising of improvements to the existing habitat through the creation of small features such as pools/scrapes and introduction of small boulders within a Habitat Mitigation Area.

The Application will also seek authorisation for the compulsory acquisition of interests in land, the temporary use of land, and the overriding of easements and other rights.

Environmental Impact Assessment

The Application is an Environmental Impact Assessment development ("EIA development") as defined by The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Application is therefore accompanied by an Environmental Statement.

Copies of Application Documents

The application form and its accompanying documents, plans and maps, including the Environmental Statement and draft DCO, are available to view electronically and download, free of charge, on the project page of the Planning Inspectorate's National Infrastructure Planning website, being a website maintained by or on behalf of the Secretary of State:
https://infrastructure.planninginspectorate.gov.uk/projects/north-east/boston-alternative-energy-facility-baef/?ipcsection=docs

The documents will be available on the website until at least Friday 18 June 2021.

The documents will also be available to view on the project website: https://www.bostonaef.co.uk/document-library/ from Tuesday 4 May 2021 until at least Friday 18 June 2021.

On request, a USB containing these documents can be provided free of charge. Whilst it is preferable to send these documents on a USB, hard copies of the documents can also be made available, however, a charge will be made for hard copies to cover printing, postage and VAT at 20%, up to a maximum of £5,000. Please contact the Applicant for details regarding payment methods and stating whether you would like to receive copies of the suite of application documents or individual documents. The Applicant can be contacted by the following means—

Email: consultation@bostonaef.co.uk

Telephone: 0800 0014 050

By writing to: Freepost RTLY–RLGH–GKSE, Boston Alternative Energy Facility, 25 Priestgate, Peterborough, PE1 1JL

Making representations about the proposed DCO

Any person may make representations on the Application to the Secretary of State (including giving notice of any interest in, comment on, or objection to the Application) by registering with the Planning Inspectorate as an Interested Party. All representations relating to the Application must be made on the Planning Inspectorate's Registration and Relevant Representation Form, and give the grounds on which it is made. The Planning Inspectorate has issued detailed advice on registering as an interested party and making a relevant representation, to which you are advised to have regard. This Advice Note (8.2 – How to Register to Participate in an Examination) is published on the National Infrastructure Planning website under 'Legislation and Advice' and can be found at:
https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8-2v3.pdf

The Registration and Relevant Representation form will be made available by the Planning Inspectorate once the registration/representation period has opened on the relevant page for the Application via the National Infrastructure Planning website:
https://infrastructure.planninginspectorate.gov.uk/projects/north-east/boston-alternative-energy-facility-baef/

If you are unable to complete a registration form online and would like to register your interest, please call the Planning Inspectorate's helpline on: 0303 444 5000, quoting the name of the Application and the Planning Inspectorate's reference number EN010095.

Alternatively, you can request a hard copy of the registration form by telephoning the Planning Inspectorate on 0303 444 5000 quoting the name of the Application and the Planning Inspectorate's reference number EN010095. Completed forms should then be sent to the Planning Inspectorate by post or email to—

Post: The Planning Inspectorate, Major Applications & Plans, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Email: BostonAlternativeEnergyFacility@planninginspectorate.gov.uk

The period during which you can submit a Relevant Representation to the Planning Inspectorate begins on Wednesday 5 May 2021, being the calendar day after the date this Section 56 Notice is first published and will end on Friday 18 June 2021. **Representations must be received by the Planning Inspectorate by 23:59 on Friday 18 June 2021.**

All representations must include details of the maker's name, address and telephone number, along with an outline of the points intended to be made at the examination stage. Please ensure that you quote reference number EN010095 in all correspondence with the Planning Inspectorate about the Application.

Please note that any submitted representations to the Planning Inspectorate will be published on the National Infrastructure Planning website for the Application and will be subject to their privacy policy which can be viewed at: https://infrastructure.planninginspectorate.gov.uk/help/privacy-and-cookie/

Further information about the Application may be obtained from the Applicant by using the following contact details—

Email: consultation@bostonaef.co.uk

Telephone: 0800 0014 050

Any details you provide to the Applicant via telephone or e-mail will be subject to its privacy policy, which is available to view at: www.bostonaef.co.uk/home/privacy-statement/

Alternative Use Boston Projects Ltd

4 May 2021

Minutes

HaskoningDHV UK Ltd.
Industry & Buildings

Present:	Paul Salmon (PS), Abbie Garry (AG), Alun McIntyre (AM), Charlotte Goodman (CG) (Royal HaskoningDHV), Aranya Tharumakunarajah (AT) (BDB Pitmans), Sam Williams (SW), Richard Woosnam (RW) (Alternative Use Boston Project (AUBP) Ltd.), Mike Gildersleeves (MG), Nick Davis (ND) (Boston Borough Council (BBC)), Jake Newby (JN), Kevin Burton (KB), Helen Dale (HD) (Environment Agency (EA)), James Stewart-Evans (JSE).
Apologies:	
From:	Abbie Garry
Date:	7th September 2021
Location:	Teams
Copy:	
Our reference:	PB6934-RHD-ZZ-XX-MI-Z-1087
Classification:	Project related
Enclosures:	

Subject: **Boston Alternative Energy Facility Air Quality Topic Meeting 07.09.21**

Number	Details	Action
1	PS gave an introduction to the project. KB asked if there is a plant with step grate in the UK, of a similar design to that proposed. SW noted that they are still in discussions with technology providers but there are plants in the UK and EU with this technology.	
2	**Boston Borough Council Relevant Representation (RR)** ND noted the main issues were related to dust and particulates, particularly as there is a sensitive operator close to the site producing ink cartridges. ND mentioned active dust monitoring would be required particularly during construction. AM noted that continuous dust monitoring would be covered in the Code of Construction Practice. AM noted we could also have some engagement with the company. AM also mentioned there would be a permit for the concrete batching plant. RW noted they were going to be part of the Considerate Constructors Scheme which includes dust monitoring during construction and operation.	AM to consider engagement with ink cartridge company
3	**Environment Agency** KB noted that the EA don't use air quality experts to review an application until the permitting stage.	

Number	Details	Action
	KB noted that the 94% headroom stands out.	
	CG noted that the receptor at which the maximum impact was predicted to occur, as a result of emissions from operation of the facility (R35) was located just across The Haven from the Facility. The contribution from the Facility was 10% of the air quality objective, but the background concentrations at R35 are well below the air quality objective and the combined impact plus background is well below the air quality objective. At receptor R28, within the Boston AQMA, background concentrations are close to the air quality objective but the contribution by the facility at this location is much smaller, so it is the background in the AQMA, principally, which accounts for the Predicted Environmental Concentration (PEC) of 94% of the air quality objective.	CG to send table of data to JN and KB.
	AM noted the detailed schedule of nitrogen dioxide concentrations should have been included in an appendix. This will be submitted as part of an updated appendix. AM noted we could send it through first to the EA in advance of the formal submission.	PS to confirm the EA officer working on the EA permit
	HD asked when the applicant will be submitting a request for an enhanced pre application meeting.	
	AM confirmed a colleague Iain Johnson has submitted the pre-application request.	
	PS noted we would confirm who this request went to.	
	JN noted that at the Preliminary Meeting the EA are going to raise that the 6 month timetable may not be sufficient to resolve all environmental permit issues. JN noted it may take 12 months to finalise the permit process.	
	Stack height	
	AM noted the stack height is proposed to be 80m above ground level, this limit is due to the height of St Botolph's Church but we have not seen a specific planning requirement related to this.	
	MG noted that Policy 29 notes the dominance of the church in the landscape and there is importance in terms of tourism and from a historic point of view. MG noted increasing the height would lead to more dominance and competition with the landscape views.	
	AM confirmed there was five stacks all together including two related to the lightweight aggregate facility and three associated with the Energy from Waste lines.	

Number	Details	Action
	AM noted in the assessment NO_X emissions would be at the maximum of the range of the BAT AELs. AM noted if selective non- catalytic reduction for NO_x control was implemented then the emissions could be reduced. KB noted contour maps were requested. AM confirmed the contour maps are within Figure 14.6 – 14.15 (doc ref: 6.3.22, APP-088). *Gas fired peaking plant* AM noted EA's comment on the gas fired peaking plant at Lealand Way. AM confirmed this was taken account of. KB noted the comment was because the long term impacts were covered rather than the short term. But confirmed the short term impact would be insignificant. *Defra background mapping* AM noted EA's point on whether the Defra background mapping included shipping. AM confirmed that shipping emissions (for particulates) was included within the grid square, with data from 2018 maps. KB questioned if there would be a difference in NO_x from a square over the Haven compared to rural land. AM noted that they could have a look at that comparison and could include in the information. *LWA Kilns* AM noted the EA's comment that the EP would need to limit operation to three kilns of the LWA at any one time. RW confirmed that one line is standby for maintenance, there are two lines which will take the ash and one which will use the APC residues. AM asked about vaporisation of metals from the APC residues. RW confirmed they would be contained within the vitrified ceramic rather than at a higher temperature. RW confirmed it was a lower temperature than WID requirements, there would not be vaporisation. AM asked if we should provide a note on this. KB noted this will be asked either now or as part of the permitting process.	AM/CG to compare NO_x levels on Haven vs rural land. AM to consider note on vaporisation of metals

Number	Details	Action
	Visible Plumes CG noted further analysis has been done on visible plumes based on the number of plumes in daylight hours. This will be submitted as part of the application. With regards to photomontages PS noted this should be considered whether it is necessary based on the data. CG mentioned a photomontage may give the impression the plume is there all of the time. AM noted that in the ES 925 m is the maximum length of the plume, however this has been revised. AM noted the methodology in the SEPA guidance document included a framework was used for assessing the plume and was assessed as being of between small and medium significance. AM noted this report could be shared early. CG noted they have worked out the plume in the daylight hours and considered whether the plume extends beyond the boundary of the facility site. *Odour* AM noted the EA's comment on odour in terms of bale splitting. RW confirmed this was all under cover in a building and the splitting and bunker are under negative pressure. HD asked about damaged RDF bales. RW noted that if the bales are identified as split whilst within the vessel they won't be taken off the vessel. If they are damaged during handling they will be re-baled. PS noted there will also be a large catch net which will catch any debris which might fall out of any split bales. PS noted the drainage on the wharf area would go into an internal drainage system on site. KB noted that for other application the EA have issued a draft permit in advance of a decision being made by PINS to give confidence that the operation is permittable.	AT to check dDCO for EA as CoCP consultee

Number	Details	Action
	KB also noted concerns in terms of noise impacts and would like to have further conversations which would usually be part of the permitting process. PS noted the noise expert was not part of this call. But to provide any questions to us. JN also mentioned adding the EA as a consultee for the CoCP. AT noted she will check the draft DCO. **Public Health England** AM noted PHE's comment on the dioxins and furans emitted and stated that a detailed updated assessment of dioxins and polychlorinated biphenyls (PCBs) has been commissioned, which will be submitted at Deadline 1. AM noted deposition on farmland, horticultural land and uptake into the food chain is being considered, including uptake by shellfish. JSE noted that PHE would need to see if metal deposition and uptake has been screened and addressed. JSE noted that the Food Standards Agency (FSA) would consider whether deposition would lead to food chain problems. AM requested contact details. JSE to email over contact details. *Euro 6 Vehicles* JSE noted that for ship emissions a similar standard as Euro 6 should be considered. JSE noted ship idling at berth. RW noted there would be 'cold ironing' so the vessels can switch off their engines and rely on shore power. CG noted this was factored into the assessment. *Health Impacts* AM mentioned pre-existing health conditions and noted we will follow up with that information.	JSE to provide FSA contact details

Number	Details	Action
	JSE mentioned exposure reduction considering different populations and vulnerabilities including where they are.	
	Accidents/ Fire	
	JSE noted that with regards to fire prevention plans it should be confirmed how far the permit would go including whether this will include materials on ships.	
	RW noted the exterior temperature of the hold can be measured and a mobile tank of CO_2 can be injected to it cool down. This could be moved to another dock or to the Port of Boston.	

Appendix B Glossary

Term	Abbreviation	Explanation
Alternative Use Boston Projects Limited	AUBP	The Applicant.
Development Consent Order	DCO	The means for obtaining permission for developments of Nationally Significant Infrastructure Projects (NSIP).
Habitat Mitigation Area	HMA	A 1.5 ha located approximately 170 m to the south east of the Principal Application Site, encompassing an area of saltmarsh and small creeks at the margins of The Haven where habitat mitigation works will be provided.
Habitats Regulations Assessment	HRA	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
Environmental Permit	EP	A permit issued by the Environment Agency under The Environmental Permitting (England and Wales) Regulations 2016 which requires certain industrial installations to obtain an environmental permit before they are allowed to operate.
Lightweight Aggregate	LWA	Plant for the manufacture of lightweight aggregate used to produce lightweight concrete products such as concrete

Term	Abbreviation	Explanation
		block, structural concrete and pavement.
Principal Application Site	N/A	A 26.8 hectare site where the industrial infrastructure will be constructed and operated. It is neighboured to the west by the Riverside Industrial Estate and to the east by The Haven.
Refuse Derived Fuel	RDF	The fuel produced from various types of waste, such as paper, plastics and wood from the municipal or commercial waste stream.
Statement of Common Ground	SoCG	This document.

Appendix C Final Agreement

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@phe.gov.uk
www.gov.uk/ukhsa

Our Ref: 58507 CIRIS

Ms Abbie Garry
Environmental Consultant
Royal Haskoning DHV UK Ltd
Westpoint
Lynch Wood Business Park
Peterborough PE2 6FZ

23 March 2022

Dear Ms Garry

Boston Alternative Energy Facility
Final Statement of Common Ground

Thank you for providing UK Health Security Agency (UKHSA) with a copy of the final Statement of Common Ground for the above-named development. I confirm that we are content to agree the document.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.