

From: [REDACTED]
To: [Boston Alternative Energy Facility](#)
Cc: [REDACTED]
Subject: Unique Reference: 20028157 re letter of 25 May from Dept for Energy Security & Net Zero (Ref. No. EN010095) [ROYT-LIVE.BOS0104.BOS0104-0004.FID23399]
Date: 08 June 2023 13:39:00
Attachments: [image002.png](#)
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Dear Sir or Madam

Application by Alternative Use Boston Projects Limited (“the Applicant”) for an Order granting Development Consent for the proposed Boston Alternative Energy Facility (“the Proposed Development”)

Thank you for the notification of the letter from the Department for Energy Security and Net Zero on the effect of the proposed BAEF on air quality and the Wash SPA dated 25 May 2023.

We act for the Boston and Fosdyke Fishing Society and have made representations throughout this process. Whilst our points below are not of direct relevance to air quality and the Wash SPA, they are related to the first round of questions from 2022. Given the direct impact on our clients’ livelihoods that the BAEF would have and, further, given the delay in a decision being reached on this matter and the changes of Secretaries of State, we thought it opportune to emphasise our client’s key points below.

Navigation Mitigation Plan (NMP)

Our client notes with real concern that the issue of the NMP has been referred back to the Port of Boston by the Application and that the NMP will not be drawn up and agreed unless and until the proposed BAEF is granted consent. This makes it nigh on impossible for our clients who require knowledge of an agreed plan in order for them to be able to work with the same to sustain their livelihoods.

The extra shipping to and from the proposed BAEF will have a huge impact on safe navigation and, to mitigate this danger, our clients and the local fishing industry in general, will have to endure enormous disruption. As the Secretary of State will be aware from our earlier representations, the river has a very small tidal window: our clients will not be able to restrict their departure and arrival times to suit the dock and BAEF (as it appears will be required if this extra shipping comes to the Port of Boston). Whilst the Dock insists that it has, in the past, dealt with the proposed number of ships, our clients dispute such assertion, given that the turning and transiting of the ships down the river to the proposed new wharf is a completely new scenario and wholly untested.

The NMP should be agreed in full with our clients before it is formally signed off.

East Inshore and East Offshore Marine Plan 2014

Our clients understand that the East Inshore and East Offshore Marine Plan 2014 states that no new business should have a detrimental impact on any existing business or for that existing business to expand. If this application is granted, it will have a very wide-ranging negative impact on the local fishing industry and the whole local supply chain and associated industries. With food security such a top priority, Boston’s fishing industry should not be subjected to such a deleterious effect as the proposed BAEF would have. In the unfortunate event that the Secretary of State grants consent for this application, we would ask that conditions are attached to any such permission which require the operators of BAEF to compensate for the loss to our clients’ and associated (to include compensation for lost days at sea and delays in waiting for turning ships). Further, we note that BAEF plans to compensate Natural England in respect of measures which will affects our clients’ fishing grounds, just outside of the river mouth. This, too, would need to be included in any compensation package.

Our clients would like to make it clear to the Secretary of State that they have tried to work with BAEF from the outset of this project. However, the BAEF has dismissed opportunities (either between clients or their lawyers) to discuss detailed issues and we feel that our client has been dismissed as an irritant rather than the hard-working fishermen at the forefront of our country’s fishing industry with hundreds of years of history. As a county, we need food security and we are aiming for net zero emissions. To flagrantly fly in the face of both of these for the sake of a transient and polluting project seems wholly counterintuitive and we would urge the Secretary of State to

dismiss this application.



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