



LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days in which to respond with any comments to a scoping consultation, stating either the information that they consider should be included in the Environmental Statement or that they do not have any comments.

Any responses received after the deadline are not considered within the Scoping Opinion but are forwarded to the Applicant for consideration, in accordance with the policy set out in the Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping.

The following EIA scoping consultation response was received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's Scoping Opinion.



Historic England

SOUTH EAST OFFICE

Ms Alison Down
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
Bristol
BS1 6PN

Direct Dial: 01483 252015

Our ref: PA00460255

16 January 2017

Dear Ms Down

Request for Advice

KEMSLEY GENERATING STATION POWER UPGRADE, KEMSLEY, KENT

Thank you for contacting us on 14 December 2016 regarding an EIA screening/scoping opinion in relation to the above site. We provide the following advice.

Advice

This development could, potentially, have an impact upon designated heritage assets and their settings in the area around the site. A designated heritage asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The Historic Environment chapter of the EIA Scoping report identifies a range of designated heritage assets within the wider environs of the proposed development. We would draw your attention, in particular, to the following:

- Castle Rough scheduled monument (National Heritage List no 1013368), a medieval moated manor site which lies c.500m south-south west of the proposed development site, and which may be inter-visible with the proposed buildings.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or



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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

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artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of Swale Borough Council and the archaeological staff at Kent County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the scale of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. We judge the parameters identified in the Historic Environment chapter of the EIA Scoping report to be sufficient for this purpose.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. Consideration should also be given to undertaking a practical exercise with either a crane or balloons erected at the height of the proposed building and chimneys so that all parties are better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.



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Recommendation

We urge you to address the above issues, and recommend that this application be supported by a thorough assessment of the potential impacts of the scheme upon the Historic Environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely



Rebecca Lambert
Inspector/Assistant Inspector of Ancient Monuments
E-mail: rebecca.lambert@HistoricEngland.org.uk

cc Simon Mason, Kent County Council Archaeological Officer

**KEMSLEY GENERATING STATION POWER UPGRADE, KEMSLEY, KENT
Request for Pre-application Advice**

List of information on which the above advice is based

WHEELABRATOR KEMSLEY GENERATING STATION - POWER UPGRADE; EIA
SCOPING REPORT - RPS December 2016



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