



Wheelabrator
TECHNOLOGIES



WKN Rail and Water Transportation Strategy

Wheelabrator Kemsley (K3 Generating Station) and Wheelabrator Kemsley North (WKN) Waste to Energy facility Development Consent Order

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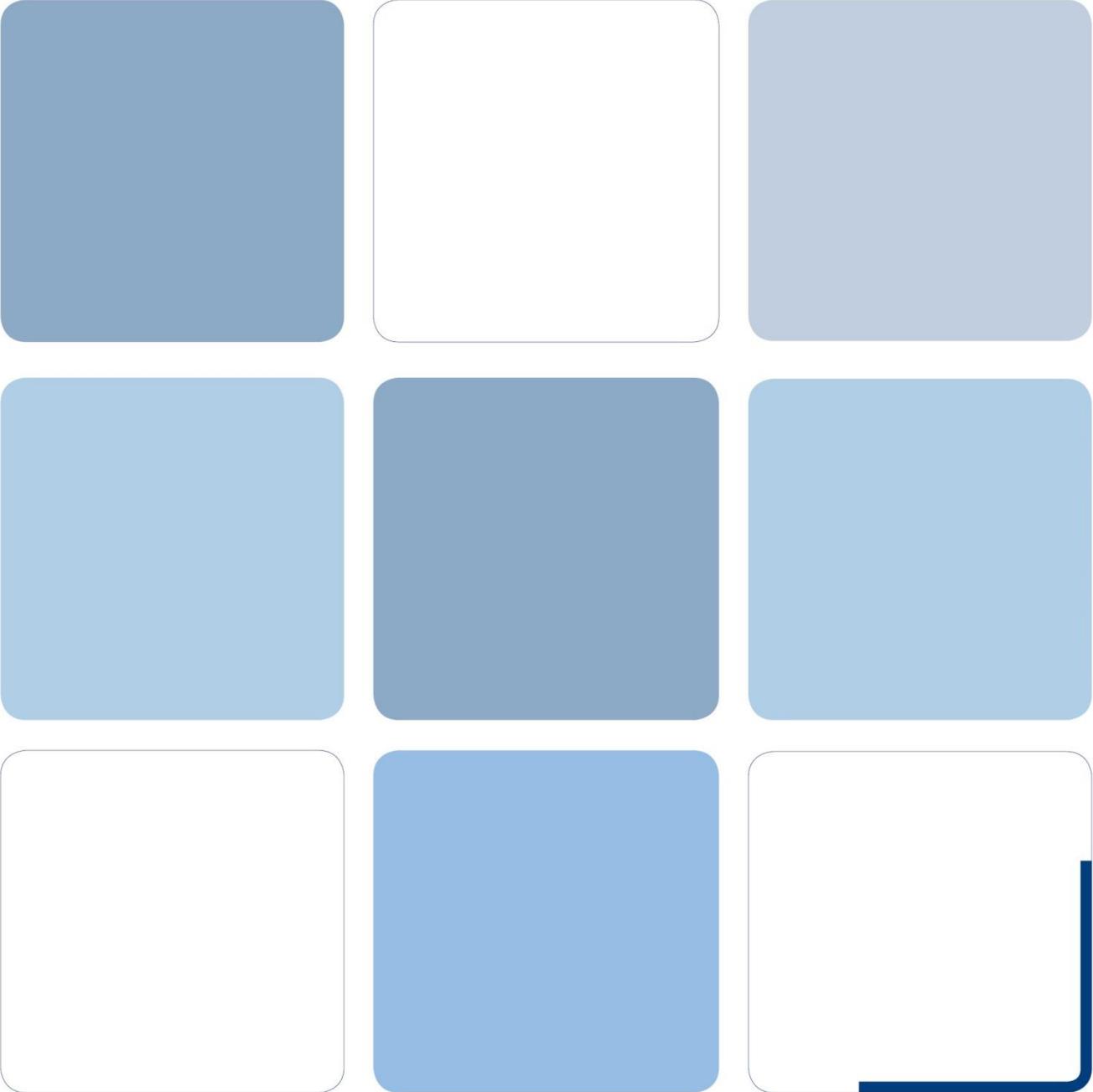
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Rail and Water Transportation Strategy

Wheelabrator Kemsley North (WKN).



RAIL AND WATER TRANSPORTATION STRATEGY

WHEELABRATOR KEMSLEY NORTH (WKN)

September 2019

Our Ref: OXF9812

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1 INTRODUCTION

- 1.1 This Revised Rail and Water Transportation Strategy has been prepared by RPS Planning & Development, on behalf of Wheelabrator Technologies Inc. pursuant to the submission of a Development Consent Order (DCO) application to the Secretary of State for a new waste to energy plant, Wheelabrator Kemsley North (known as WKN) on land adjacent to the K3 waste-to-energy generating station at Kemsley, Sittingbourne in Kent.
- 1.2 In March 2012 Kent County Council (KCC), as planning authority, granted planning permission for a Sustainable Energy Plant (SEP) known as K3, (a generating station providing steam to the Paper Mill and electricity to the Grid) adjacent to DS Smith's Kemsley Paper Mill and adjacent to the WKN site. Condition 6 of this permission required the submission of a rail strategy to encourage the transportation of fuel to the site by alternative means to road, such as rail. This condition was discharged in 2013.
- 1.3 It was anticipated at the time of the planning permission being granted that a pre-treated waste contract would be secured from the North London Waste Authority (NLWA) as the developer (EON and Wheelabrator at that time) were the sole remaining bidder for the Fuel Use contract.
- 1.4 A strategy was submitted and approved to discharge condition 6 in 2013 which explored opportunities for the transportation of fuel to the site via an improved rail terminal at Ridham Dock in accordance with an extant planning permission.
- 1.5 However, the contract was subsequently withdrawn from tender by NLWA, and it is not currently feasible or viable to transport the available fuel to the site by rail or water. As is discussed later in this document, it is proposed that the position relating to feasibility, viability, environmental impacts and land availability in relation to transportation by rail or water is reviewed periodically. This is a position that has previously been accepted at the K3 site under the revised strategy submitted in 2017 (in relation to condition 6) and is further evidenced in other proposals of a similar nature as discussed in Chapter 6 of this document.
- 1.6 Construction of the waste-to-energy generating station at the K3 site began in 2016 and is expected to be completed with the plant operational by late 2019. Wheelabrator Technologies have identified the ability for K3 to generate an additional 25.1MW through internal efficiencies and for the facility to process an additional 107,000 tonnes of waste per annum. However, in order to properly categorise and consent those increases under the Planning Act 2008 the application seeks a DCO for the construction and operation of K3 to its full proposed generating capacity of up to 75MW and with a tonnage throughput of 657,000 tonnes per annum. Furthermore, the DCO application also seeks permission for a new waste to energy plant, Wheelabrator Kemsley North (WKN) which is proposed to be a single 125MW line facility capable of processing 390,000 tonnes of waste per annum, with a generating capacity of 42MW.

- 1.7 Further to a formal application to the Secretary of State under section 35 of the Planning Act 2008 in relation to whether the development could be treated as development for which Development Consent is required, a direction was received on 27th June 2018 confirming that Development Consent is required for WKN. As a result of the new proposals, it is considered appropriate to prepare an updated strategy to accompany the DCO application relating to both the K3 and WKN sites with specific reference to the upgraded WKN site and any potential joint rail or water transportation opportunities.

2 BACKGROUND

- 2.1 There are a number of planning permissions relating to the adjacent K3 site. Planning permission for the waste-to-energy generating station was originally granted in March 2012. Although the Environmental Statement (and the Transport Assessment) that accompanied the application acknowledged that there is potential for fuel to be transported by rail (and water), it was predicated on a worst case basis that all fuel would be transported by road. The number of HGV movements associated with the proposed development was assessed on that basis.
- 2.2 Details relating to the planning history of the adjacent K3 site are addressed in the accompanying Rail and Water Transportation Strategy for K3 which is submitted alongside this document.
- 2.3 An application for a standalone IBA facility on the proposed site of WKN was approved by KCC in February 2017 (KCC/SW/0265/2016). This permission has not been implemented.

3 PREVIOUS RAIL STRATEGIES AT K3

- 3.1 In order to discharge condition 6 of the K3 planning consent, a strategy was submitted to and approved by KCC in September 2013 (KCC Ref. SW/10/444/R).
- 3.2 The approved strategy acknowledged the background to the condition as set out above, and in particular that with the opportunity for up to 80% of the fuel to be sourced from outside Kent and its hinterland, the use of the nearby rail infrastructure offered significant potential to import waste as a fuel in a more sustainable way, particularly over longer distances which is consistent with the objectives of addressing the impacts on climate change.
- 3.3 In addition, it is also recognised that transporting fuel by rail is potentially a more viable mode of transporting fuel, if it is logistically feasible.
- 3.4 In summary, the approved strategy explored the opportunity to import waste as a fuel to the Kemsley waste-to-energy generating station from the wider area by rail via an upgraded rail facility at Ridham Dock and from there by road the relatively short distance along the existing docks access road providing a direct link to the Kemsley waste-to-energy generating station site. The proposal would have provided the potential for the carriage of some 80% of fuel stock equating to 450,000 tonnes of waste to the site without material impact to the public highway.
- 3.5 The approved strategy relied upon upgrading the existing rail infrastructure in accordance with an extant planning permission (KCC Ref. SW/12/167) which permitted the refurbishment and use of existing rail sidings and associated infrastructure for the purposes as a rail borne delivery point, specifically for waste used as fuel destined for the proposed waste-to-energy generating station.
- 3.6 The approved strategy was based upon securing the North London Fuel Use contract. The waste from North London would have been pre-treated, and it would have been logistically feasible to transport by rail owing to the proximity of rail infrastructure at both the source in London, as well as at Ridham Dock. The quantity of waste fuel viable would have ensured that the provision of the necessary infrastructure was viable.
- 3.7 However, the North London Fuel Use contract procurement process was subsequently withdrawn by the North London Waste Authority, as they favoured managing the waste locally. The new North London Heat and Power (NLHP) project at Edmonton Eco Park, which has secured Development Consent, will now manage this waste.
- 3.8 It was therefore necessary to secure alternative sources of waste for the waste-to-energy generating station. The challenge of finding and securing sufficient waste for a merchant facility of this scale and to demonstrate to financial institutions that the development is commercially viable should not be underestimated. Accordingly, use of rail transport was a key factor in determining these contracts, given its potential to save significant transportation costs.

However, having due regard to the geographical distribution of the available sources of this waste and its proximity to the necessary rail infrastructure in the quantities needed to make it viable, it was considered neither feasible nor viable to transport the waste to Ridham Dock by rail at that time.

- 3.9 In order to discharge the planning conditions in relation to application SW/10/444, a revised rail strategy, amongst other documents was submitted to Swale Borough Council and Kent County Council in 2017. The rail strategy (required to discharge condition 6) explored the feasibility and financial viability of using rail as a means of transport to and from the site.
- 3.10 It remained the case that it is not feasible or viable to transport the available fuel to the site by rail or water. Both the 2014 strategy and the later 2017 strategy proposed that the position relating to feasibility of transportation by rail or water is reviewed periodically.
- 3.11 Due to the current change in circumstances and the proposed additional throughput as well as the adjacent proposed new development at WKN, it has been considered necessary to re-consider the position in relation to transportation of fuel by both rail and water and provide an updated strategy to accompany the DCO covering both the K3 and WKN sites.

4 CURRENT PLANNING POLICY

- 4.1 Both national and local policy seeks to encourage the use of non – road modes of transport, including the transportation of waste.

National Policy

- 4.2 At the national level the relevant policy is set out in National Policy Statement EN-1 and EN-3, the National Planning Policy for Waste and the National Planning Policy Framework (NPPF) (as amended).

- 4.3 The relevant National Policy Statements (NPSs) relate to the determination of development consent applications for Nationally Significant Infrastructure Projects (NSIPs). The Planning Statement (Document 4.2) discusses in full the relationship of WKN to national policy, given WKN is not an NSIP by virtue of its generating capacity but has been directed by the SoS as being of national significance.

- 4.4 NPS EN1 – The Overarching NPS for Energy sets out that the consideration and mitigation of transport impacts is an essential part of Government’s wider policy objectives for sustainable development (paragraph 5.13.2), and that water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective (paragraph 5.13.10).

- 4.5 NPS EN3 – for Renewable Energy outlines at paragraph 2.5.25 that:

“Government policy encourages multi-modal transport and the IPC should expect materials (fuel and residues) to be transported by water or rail routes where possible. (See Section 5.13 of EN-1 on transport impacts). Applicants should locate new biomass or waste combustion generating stations in the vicinity of existing transport routes wherever possible. Although there may in some instances be environmental advantages to rail or water transport, whether such methods are viable is likely to be determined by the economics of the scheme. Road transport may be required to connect the site to the rail network, waterway or port. Therefore, any application should incorporate suitable access leading off from the main highway network. If the existing access is inadequate and the applicant has proposed new infrastructure, the IPC will need to be satisfied that the impacts of the new infrastructure are acceptable as set out in Section 5.13 of EN-1.”

- 4.6 The NPPF (updated February 2019) states that:

- Policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.

- 4.7 In addition, the National Planning Policy for Waste (2014) sets out that waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against a number of criteria including the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products

arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport.

- 4.8 In summary therefore, there is a national policy preference for waste fuel to be transported by rail or water, but only where there are environmental advantages, and where it is practical and viable to do so.

Local Policy and Guidance

- 4.9 At the local level, since the application was determined (and condition 6 imposed) there has been a change to the development plan as the Kent Waste Local Plan (KWLP) has been replaced by the Kent Minerals and Waste Local Plan (KWMLP). In this respect, KWMLP policy DM13 – Transportation of Minerals and Waste requires the transportation of waste by road to be minimised as far as practicable with a preference for non-road modes of transport.

- 4.10 The Swale Transportation Strategy 2014 – 2031 Draft Appendix is a comprehensive document looking at the issues regarding transport in Swale and potential solutions for these. The strategy, amongst other ambitions, aims to encourage sustainable travel and alternative access to services.

5 LAND AVAILABILITY

- 5.1 Following the withdrawal of the North London Fuel Use contract procurement process there followed a need to secure merchant contracts for waste fuel to supply K3.
- 5.2 As a result of the use of rail and/or water transport not being feasible or viable for merchant waste, the option to acquire the site for the upgraded Ridham Dock facility lapsed, and it is understood that the land has now been developed for other purposes. It is therefore no longer available for acquisition.
- 5.3 There would, however, potentially be other land available within Ridham Dock or its vicinity from which it may be feasible to develop a rail freight terminal to serve the waste-to-energy generating station at K3 and the WKN site, subject to viability.
- 5.4 As regards the use of the land at Ridham dock for transportation by barge, it is recognised that the River Medway and Swale waterway is a principal inland freight waterway and given the site's location there is a theoretical possibility that fuel or/or waste could be transported to and from the site by barge. Works would, however, be required to ensure sufficient facilities to accommodate the anticipated level of freight.

6 REVIEW OF STRATEGIES PREVIOUSLY ACCEPTED BY THE SECRETARY OF STATE

- 6.1 The strategies of other consented schemes for generating stations which use waste as a fuel are relevant where they have satisfied the Secretary of State that they accord with national planning policy. The most recent examples include the determination of applications for Development Consent in relation to Ferrybridge Multifuel 2 (FM2), and the North London Heat and Power (NLHP) project both of which secured consent.
- 6.2 In the case of FM2, it was recognised that there was potential for the development to be served by water rather than rail. In that regard the Secretary of State agreed with the Examining Authority that requirement 35 secured the necessary mitigation and control to meet the objectives of national policy. This requirement included an assessment on the cost of the upgrade of the necessary wharf facilities and an appraisal every five years of the viability of transporting waste and ash by water.
- 6.3 In the case of NLHP, again the potential for the transportation of waste by non-road modes was by water rather than by rail and in this case the potential related only to the transport of the IBA by-product rather than the waste fuel itself.
- 6.4 However, the land necessary to upgrade an existing wharf was required for other development and was not available. In addition, an assessment demonstrated that the reduction in CO₂ emissions were minimal in the context of the wider project. On this basis, the Secretary of State accepted that the national policy had been met and granted the DCO without any requirement in respect of the transportation of waste fuel or ash by non-road modes.

7 PROPOSED STRATEGY

- 7.1 Taking into account the previous applications at K3 and the requirement to provide a strategy for transportation of waste and fuel as required by condition 6 of the original approval, it is considered appropriate to put forward a new strategy to inform the proposed DCO application. This takes account of the Section 42 responses received from Kent County Council and the Department for Transport.
- 7.2 In this context, while it has been suggested that discussion with Network Rail would be appropriate, it is clear that there is neither the appropriate infrastructure nor the necessary contracts available for transportation by rail. However there remains the potential to bring waste into Ridham Dock and then onto WKN via rail should the necessary contracts to make that possible and viable be secured.
- 7.3 It is recognised that the River Medway and Swale waterway is a principal inland freight waterway and given the site's location there is a theoretical possibility that fuel or/ or waste could be transported to and from the site by barge.
- 7.4 However, there would be the need to upgrade the existing facilities at the dock to accommodate the additional freight necessary to make this a viable option and this would require significant investment. Given that there is currently no certainty with regard to contracts for water freight, this option cannot at present be commercially justified.
- 7.5 Notwithstanding the above context, there remains both a national and local planning policy preference for the transportation of waste by non-road modes where it is environmentally advantageous to do so, and where it is feasible and viable.
- 7.6 In addition, should it prove to be feasible and viable, it remains in the operator's interests to deliver the necessary infrastructure to secure waste fuel contracts.
- 7.7 It is therefore proposed to adopt a strategy informed by the current planning policy context and the most recent determinations by the Secretary of State whereby a review of the transportation of waste to the site by rail and/or water is submitted to Kent County Council for approval every 5 years comprising of the following stages:
- The fuel available;
 - The environmental benefits of transporting the available fuel by rail or water to the site, including the carbon savings;
 - The feasibility of transporting the available fuel to the site by rail or water;
 - The availability of land to provide the necessary infrastructure to transport the fuel to the site by rail or water; and,

- The costs of providing the necessary infrastructure to transport the fuel to the site by rail or water and a viability appraisal¹

7.8 It is proposed that details of the 5 yearly reviews be submitted to Kent County Council for approval one year from the fully operational date of the upgraded K3.

7.9 Should the review conclude that the delivery of waste to the site is environmentally beneficial, feasible (subject to land availability and acquisition and the necessary planning permissions and other consents being secured), and commercially viable, it is proposed that the strategy and timescale for the provision of the necessary infrastructure be submitted to and approved by KCC.

7.10 This approach is consistent with the previously approved approach, current planning policy and other recent DCO consents such as that for FM2 and NLHP as mentioned in the previous chapter.

¹ This would necessarily have to be confidential owing to the inherent commercial sensitivities

8 CONCLUSIONS

- 8.1 A comprehensive review of the background of the site and relevant policy has been undertaken. This document also provides examples of other strategies that have been accepted by the Secretary of State and highlights that the use of rail and water transportation is not currently viable but recommends periodic review in line with other similar strategies.
- 8.2 The strategy proposes that a review of transportation is submitted to Kent County Council every 5 years in order for any new opportunities to be highlighted and where necessary implemented. The review will look at availability of land and fuel, environmental benefits, feasibility and viability.
- 8.3 The strategy proposed is consistent with previously accepted non-road transportation strategies that have been submitted in relation to the adjacent K3 site as well as other similar proposals determined by the Secretary of State and has been proposed in line with current policy.

APPENDIX A – S42 RESPONSES



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10 January 2019

Dear Mr Harvey

Re: Proposed application for the granted of a Development Consent Order (DCO) for Wheelabrator Kemsley Generating Station and Wheelabrator Kemsley North Waste to Energy Facility

Thank you for providing Kent County Council (KCC) with the opportunity to comment on the documents submitted as part of the Statutory Consultation under Section 42 of the Planning Act 2008, which includes the Preliminary Environmental Impact Report (PEIR), draft Environmental Statement (ES) and draft Development Consent Order (DCO), relating to the proposed Wheelabrator Kemsley Generating Station and Wheelabrator Kemsley North (WKN) Waste to Energy Facility.

The County Council has reviewed the documents and for ease of reference, provides a commentary structured around the published documents, under the chapter headings used within the reports.

Draft Environmental Statement

Chapter 2 Site Description and Proposed Development

The County Council is concerned that the proposal as set out in the DCO is in conflict with the Council's adopted waste strategy, which is predicated upon the principle of net self-sufficiency and the Waste Hierarchy. In assessing the merits of the DCO proposal, attention is drawn to this conflict and the applicant is asked to consider the implications upon waste planning policy in the County and also to note the concern regarding the conjoining of the two plants into one DCO proposal. These concerns will be shared with the Planning Inspectorate, should the proposal be submitted as a DCO application.

KCC is the Waste Planning Authority for Kent and so is responsible for planning the management of waste within the County. In July 2016, KCC adopted the Kent Minerals and

Waste Local Plan 2013-30 (KMWLP) that sets out the strategic and development management policy framework to be used in determining planning applications for waste management facilities in Kent. This policy framework is predicated on an approach of 'net self-sufficiency' and the management of waste in accordance with the Waste Hierarchy. This approach was found sound following independent examination by the Planning Inspectorate.

The KMWLP commits KCC to preparing a Waste Sites Plan, which would identify and allocate land considered suitable for waste development to accommodate specific types of facilities to meet the evidenced capacity gap identified in the adopted KMWLP. As part of the work to develop the evidence base for the subsequent Waste Site Plan, a review has been undertaken to confirm the predicted capacity gap for waste arising in Kent. This reassessment indicates, amongst other matters, that with the commissioning of the original consented 550,000 tonne facility at Kemsley (referred to as K3), 'net self-sufficiency' for the management of non-hazardous residual waste will be achieved and maintained to the end of the Plan period (2031).

As a result, there is no evidenced need for further waste capacity in Kent to 2030. In terms of its waste plan making responsibilities, KCC now proposes to remove the commitment from the adopted KMWLP to prepare a Waste Sites Plan. Draft proposals for modifications to the KMWLP were published in early 2018 and objections were received from Wheelabrator Technologies Inc (WTI) - the proposer of this DCO application. According to WTI predictions, future requirements for waste management would still justify the preparation of a Waste Sites Plan, and therefore the County Council should include the allocation of land at Kemsley, which WTI promoted in response to the Call for Sites conducted in 2017. KCC has considered the representations made by WTI and is unpersuaded that evidence exists to justify allocation of the site and the provision of additional waste capacity within the County.

The County Council is intending to publish its Pre-Submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan for public consultation in early 2019 (Regulation 19) prior to submission to the Secretary of State for examination in the Summer. It will be a matter for the Inspector examining the Early Partial Review to establish the merits or otherwise of providing additional waste capacity within the County as proposed by WTI. As such, the DCO proposal appears to potentially undermine the Local Plan process.

The DCO proposal being considered at Kemsley ('K3' and 'WKN' taken together) would result in approximately a further half million tonnes of waste (497ktpa) recovery capacity being built in Kent. This is far in excess of the requirements indicated by the adopted Plan and by the latest Waste Needs Assessment for Kent to maintain net self-sufficiency to 2031 i.e. throughout the Plan period. Once the original consented capacity at Kemsley of 550ktpa is taken into account (SW/10/444), this identifies no additional need for 'Other Recovery' capacity. Provision of this additional 497ktpa of capacity is likely to mean that management of waste will be locked into incineration for the next 25 to 30 years at least, thus compromising its management by methods further up the Waste Hierarchy – for instance, by being prevented in the first place or recycled/composted. This would be contrary to national and local policy on waste management.

The additional capacity may also draw waste in from beyond the boundaries of Kent. This could result in a substantial imbalance being created between waste planning areas and

disrupting the move towards net self-sufficiency being pursued by authorities around the wider South East. This supports the achievement of the Waste Framework Directive proximity principle for mixed waste.

Whilst the DCO proposal seeks to conjoin the planning consideration of the two waste plants, there is no justification for considering the applications for the K3 facility upgrade and the new free-standing Energy from Waste (EfW) facility WKN as a single DCO application in the manner proposed. The reasons presented in the Secretary of State's (SoS) initial decision do not appear to amount to legitimate grounds to circumvent the established mechanism through which such applications ought properly to be considered. In this regard, it should be noted that the County Council has demonstrated a capability of assessing applications positively in the past - having granted permission to Kemsley K3, an EfW facility at Allington and an EfW facility at Ridham dock. KCC understands that the reasons put forward by the applicant to conjoin the two developments into one DCO application are:

- They are on the same site, which is understood to mean both K3 and WKN are located on land owned by the same company i.e. WTI; (*KCC however notes that there is no connection between the two proposals, nor a direct connection between WKN and the adjacent Paper Mill, unlike for K3 which is to supply steam to the Mill*)
- If the applications were made separately, they would be made at the same time;
- The applications are being considered at the same time as a separate DCO application (K4) for a gas fired powerplant; (*KCC however considers that it should be noted that this proposal has no relationship with WKN, and is not located on the land owned by the promoter of these schemes, WTI*)
- There would be benefits to K3 and WKN "being assessed comprehensively" at the same time - through the same streamlined process and in a consistent manner by the same decision maker, avoiding duplication of work and reducing the burden on the local planning authority; and
- Consideration of any likely significant environmental effects will be simplified.

None of the above criteria justify that the WKN proposal is one that should be considered 'nationally significant'. Similarly, the energy output of the WKN proposal falls below the threshold for a DCO application. This proposal should therefore fall to the County Council to determine on the basis of its individual merits by KCC as the local planning authority for the area.

It should also be noted that the first-ever National Infrastructure Assessment for the United Kingdom, published by the National Infrastructure Commission in July 2018, favours increases to recycling rates for both household and commercial waste (the waste streams targeted by the proposed developments), bolstered by separate food waste collection, over express support for expansion of EfW capacity. This follows extensive modelling of scenarios involving the development of EfW capacity. It should also be noted that the Government's Resource & Waste Strategy is due to be published by Defra before the end of the year and this will be informed by the National Infrastructure Assessment.

As recognised in the submitted documentation, the County Council granted planning permission for an EfW facility with the capacity to produce 49.5MW (application reference SW/10/444). This plant is the subject of the K3 proposal, as it seeks to increase the waste feed tonnages with a resultant increase in power output. The County Council has also positively determined a number of non-material amendments and Section 73 applications in relation to the baseline planning permission. In doing so, the County Council imposed a number of planning conditions, so as to render the development acceptable in planning terms. Given the inter-relationship of the K3 plant with the planning permissions granted by the County Council, this response encloses copies of the relevant reports to Planning Applications Committee and planning decisions (Appendix 1-18) to aid the Inspector on the matters that were considered during the planning application process and how they were resolved.

In light of the above, the County Council as Waste Planning Authority draws attention to the apparent conflict between national and local waste planning policy and seeks very careful consideration of this matter by the applicant and the Planning Inspectorate in examining the merits of the DCO proposal. KCC will also be requesting that the Planning Inspectorate satisfies itself that the planning considerations addressed in the planning consent granted by KCC are an appropriate basis for the decisions now sought.

Chapter 4 Traffic and Transport

Appendix 4.1 Transport Assessment (TA)

2 Existing Situation

Traffic Flows

The traffic and junction counts were completed in neutral dates in March 2017 and June 2016 and the County Council is satisfied that these are valid.

3 Development Proposal

Access and Site Layout

The route of access is unchanged and no assessment is required to ensure suitable geometry can be achieved.

Timescales

K3 is currently under construction (KCC/SW/10/444) and is expected to be operational by 2019, with the additional waste lorries expected in 2020. Construction of the WKN plant is expected to commence in 2021 and to last over three years.

Abnormal loads would be expected and would be subject to the usual authorisation from the relevant Highway Authorities.

The timing of the works raises some concern, as delivery would be in direct conflict with Highways England's announced M2 J5 improvement scheme delivery. The proposed build

timeline and peak for construction vehicles and staff for the construction of WKN would take place at the same time that the junctions would be expected to be under construction. During highways construction, capacity constraints or route diversion are always likely. The proposed K3/WKN build timeline would therefore increase volumes of traffic at a time when the network is planned to be constrained. Additionally, and subject to development contributions, the County Council as Local Highway Authority is seeking to secure grant funding to improve the Grovehurst junctions. In order to meet with the grant requirements, construction of the road improvements is expected to commence Q3 2021.

4 Compatibility with Transport Policies

National Policy Statements

The TA includes the correct location and details of the surrounding highway network. However, the assessment fails to mention that there is an operational dockyard and redundant railway siding within one mile of the application site. National Planning Policy Framework (NPPF) paragraph 108 states that development should seek to encourage sustainable travel, lessen traffic generation and its detrimental impacts and reduce carbon emissions and climate impacts. In this context, KCC recommends there is a clear opportunity, which should be explored by the applicant, to deliver the large quantities of waste via rail or water.

The fact that the surrounding highway network is over capacity at both the M2 J5 and Grovehurst junctions adds significant weight to the need to seek alternative means of waste delivery to reduce the potential of highway delays caused by congestion.

Without investigations on the use of the available and alternative methods of delivery, it is considered that the application is not in full compliance with paragraph 108 of the NPPF.

5 Future Year Traffic Flows

Future Assessment Year

Assessments have been carried out for the appropriate Swale Borough Local Plan (2017). Additionally, an assessment has been completed for 2021, which considers the WKN construction traffic and K3 operational movements.

The 2021 assessment is considered to include the appropriate consented developments. The 2031 assessment is also considered to include all appropriate cumulative sites.

6 Trip Generation, Mode Share and Assignment

The cumulative impact of the K3 operation includes an additional 68 daily Heavy Good Vehicle (HGV) movements for this proposal, 258 daily HGV movements for the consented scheme and an additional 90 HGV movements for collection undertaken by Refuse Collection Vehicles (RCV). In summary, the K3 site is expected to generate 416 HGV movements per day. Adding the 90 WKN and 80 K4 construction traffic brings a total of 586 movements for the site in the immediate future. In addition to that are the 84 K4 construction

staff and 409 WKN construction staff, of which a percentage would be expected to hit the junctions in peak periods.

K3 Proposed Development

The TA states that the additional 107,000 tonnes of waste per annum would generate an additional 68 movements per day and evidence should be provided as to how this has been calculated and what assumptions have been made around the size of the delivery vehicles. It is assumed from the calculations that, on average, vehicles would carry 8.5 tonnes, but this would need to be clarified. The applicant has stated that there is no increase in construction traffic to increase the capacity. An explanation is required as to how this is justified, providing evidence to demonstrate that the plant has no change to its size or materials required. KCC requests clarity to explain why, if the plant was capable of processing the additional waste, the consent was not sought in the original application (KCC/SW/10/444).

The assessment states that the HGV movements would be spread equally in terms of hourly movements. In paragraph 6.5 it is stated that “*typically HGV movements would not be in the night time periods*”. However, as shown in table 6.1, eleven of the movements are during night time hours. KCC requests that these movements are reprofiled within daylight hours to give a more accurate representation as to how the plant will operate.

WKN Proposed Development

The WKN operational temporal distribution is also inconsistent with that of the K3 analysis, and as such, is not accepted by the County Council as Local Highway Authority. For the WKN site, an assumption has been made that 25% of movements would be at night. The County Council accepts the statement in paragraph 6.5 that typically, movements would not occur over night and therefore requests that evidence is supplied from operational waste to energy sites, such as that at Aylesford. A day time comparison of the actual delivery times between 07:00 and 19:00 received from the Aylesford site should be compared to table 6.1 presented in the assessment, enabling a comparable delivery time profile to be provided. KCC has been in contact with RPS Transport Consultants requesting this detail. However, it has not been forthcoming with a level of detail to satisfy the County Council’s query.

WKN Operation

The TA states that the additional 390,000 tonnes of waste per annum would generate an additional 250 HGV movements per day.

An estimation of staff numbers ranges between 35 to 49, with 49 being assumed for the assessment. Therefore, 41 car movements are expected, representing the 84% travelling by car. However, only 37 car movements appear to be accounted for. Table 6.4 would therefore require adjustment.

Table 6.4, demonstrating the expected HGV traffic, includes 38 movements at night - contrary to the above referenced statement in paragraph 6.5. As such, these movements should be reprofiled between the hours of 07:00 and 19:00.

WKN Construction

The TA demonstrates that a peak of 482 staff would be on site during months 24-40 of construction - 45 HGV deliveries or 90 movements. The County Council requests evidence from the existing K3 construction programme to understand the level of HGV movements and to confirm that the application is robust in this respect. The County Council also requests that the hourly number of deliveries is demonstrated through traffic count evidence for one week. The information will provide evidence that the assumptions made are justifiable.

Census data has been used to calculate the mode share of staff transport. The assessment carried out assumes 84% of staff would travel by car. This allows 409 staff accessing the site per day by car and the County Council considers this a fair assumption. The assessment shows that no staff are arriving during the peak hours, which KCC considers is inaccurate. Evidence from traffic counts for the existing construction site should again be provided to justify the assumption.

Operational Trip Distribution and Assignment

The HGV distribution assumes all traffic accessing the site would come via M2 J5 and the Grovehurst junction, which is considered robust.

The RCV distribution rates are assumed to be coming from the neighbouring Countrystyle Recycling plant based at Ridham Docks. An assumption has been made that waste would be collected equally from twelve surrounding districts. It is requested that the applicant provides evidence from the Countrystyle site to demonstrate what percentage of waste is routed to and from the east, avoiding the A249/Grovehurst junction, to justify this assumption.

Appendix F appears only to show numbers and not the distribution percentages. The County Council requires a percentage flow diagram to be provided so that this can be compared to the current Countrystyle site.

7 Transport Assessment

Junction Assessment

On the assessment provided for this application, there would be expected 59 peak hour movements through the A249/Swale Way corridor - 32 in the AM and 27 in the PM. However, this assumes an even spread of HGV movements. Traffic flow counts supplied for the previous Incinerator Bottom Ash (IBA) facility assessment (KCC/0625/2018), along with KCC's own data, shows that the peaks for the M2/A249 and A249/Grovehurst junctions are spread over a three-hour shoulder between 06:00 and 09:00 in the AM and 15:00 and 18:00 in the PM.

Although a general spread of deliveries could be assumed, it could equally be assumed that up to 50% of HGV deliveries come through the affected junctions during the peak shoulders. This assumption would result in 208 deliveries from the K3 operation, 125 from the WKN

operation and 45 for the WKN construction, totally a plausible 378 movements through the peak shoulders. The 2017 observed data records 245 through the eastern A249/Grovehurst roundabout in the AM. Assessing a single peak hour would produce approximately 63 HGV movements accounting for 26% of the total HGV movements through a junction that is already operating over capacity.

Site Access

Details on the expected peak operational queueing of the combined K3 and K4 WKN traffic within the site should be demonstrated so that the Local Highway Authority can be certain that this will not spill out onto Barge Way.

Barge Way between Northern Access & Fleet End

This junction has been demonstrated to operate well within capacity at the future year scenarios. As such, the Highway Authority has no concerns with the proposed development impact at this junction.

Swale Way/Barge Way Roundabout

The assessment demonstrates that the roundabout currently operates above operational capacity at the 2024 assessment, and includes the proposal's operational traffic in both the AM and PM peaks. In the AM peak, the Swale Way West arm reaches an RFC of 1.12 with 94 queueing vehicles. In the PM peak, the Swale Way South arm reaches its operational capacity with an RFC of 0.87. The applicant should note if that proposal is progressed, it should be expected that appropriate mitigation by way of a left turn lane facility off the Swale West arm may be required, which may potentially be delivered under a s278 agreement, depending on land ownership. The approach is currently of single carriageway width and mitigation will be required for the dominant HGV left turning movements resulting from this application.

A249/Grovehurst Junction

The assessment demonstrates that this junction is already operating beyond its operational capacity and it is on that basis that an application has been submitted for "Housing Infrastructure Funding" in order that the proposed Local Plan growth can be accommodated.

The proposed development would decrease the operational effectiveness of the junction and as such, appropriate levels of mitigation should be provided. The assessment demonstrates that the junction is exceeding its capacity on five of the seven arms of the junction in the AM peak and three in the PM peak. Queues in the PM peak are of such severity that they extend for over 362 vehicles. In the AM peak, the south A249 slip has queues of 23 vehicles, introducing significant safety concerns.

Therefore, any development affecting this junction would be required to provide mitigation and until such mitigation is complete, any development that adds traffic to the junction could not proceed prior to guaranteed delivery of improvements.

Car Parking

A detailed drawing of the operational and construction car parking arrangements should be submitted in order for the County Council to assess that the expected demand is provided for.

Summary

The proposed development would be required to provide mitigating measures for the Swale Way/Barge Way roundabout and A249/Grovehurst roundabouts. These junctions are over capacity and it is considered unacceptable to route the proposed amounts of traffic through the junctions until such a time as mitigation measures are secured.

A number of areas within the TA have been identified where further information should be provided to enable the County Council to provide a definitive response.

KCC considers that fundamentally, measures must be explored to secure delivery of the waste through the available rail and water facilities in order to demonstrate that it is compliant with paragraph 108 of the NPPF.

A Construction Management Plan and Framework Travel Plan will need to be provided for the WKN site in line with that of K4 and will need be approved by the County Council as the Local Highway Authority. A Decommissioning Management Plan will also be required for the WKN site. KCC would welcome an opportunity to review these documents as early as possible in the DCO process. If these documents are to be included as a DCO requirement, KCC requests that they are subject to approval of the Local Highway Authority.

Chapter 10 Water Environment

Appendix 10.2 Drainage Design Philosophy

The County Council supports the Drainage Strategy as proposed in Appendix 10.2. Suitable levels of surface water treatment have been proposed, including interceptors and attenuation ponds.

However, the County Council recommends that additional cross-sectional drawings of the proposed attenuation pond are provided within the Drainage Strategy report when the final ES is submitted. The drawings should include the available freeboard of the pond.

Chapter 11 Ecology

Chapter 11 indicates that there is a good understanding of the ecology within the site both currently and prior to existing works occurring on site, and the County Council is satisfied with the range of surveys proposed and completed within the development footprint.

The area that WKN is proposed to be built on, currently a construction compound, was intended to be restored to grassland and scrub. However, the submitted information has confirmed that the applicant will assess the impact on the site based on the habitats

previously within the site prior to it being used as a construction compound. Therefore, the County Council is satisfied that appropriate mitigation for the continued loss of habitat from WKN can be properly demonstrated.

The site is adjacent to the Swale Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI) and therefore the development may result in a likely significant impact on designated sites. The information submitted suggests that the impact on the designated sites from the development will be assessed, but this has not been clearly set out within the report. The County Council would fully expect information to be submitted within the report to assess the impact the proposed development would have on the designated sites, particularly due to the increase in noise, lighting and air quality. The applicant would be submitting a noise, air quality and transport report and KCC highlights that the conclusions of these reports would need to inform the ES.

As the determining authority, the Planning Inspectorate will have to undertake an Appropriate Assessment (AA) as part of the planning process. The applicant has submitted information to inform an AA, but the County Council highlights that the Planning Inspectorate will need to produce/take ownership of the AA and be satisfied that the conclusions of the AA indicate that there will be no likely significant effect on the designated site.

Appendix 11.2 Habitats Regulations Assessment Report

The Habitats Regulations Assessment (HRA) concludes, either within the Screening or AA, that there will be no likely significant effect on the designated sites. The report has set out a number of mitigation measures within the AA to avoid a likely significant effect and the County Council highlights that if the DCO application is granted, these mitigation measures will need to be implemented.

However, paragraph 5.43 of the HRA outlines an exception that details that additional work is being carried out to assess the impact that the proposed development would have on the designated site in relation to an increase in traffic. The County Council highlights that this work would have to be completed and the HRA updated prior to the determination of the application.

Chapter 12 Landscape and Visual Effects

The applicant has acknowledged the existence of the Public Rights of Way (PRoW) network surrounding the site and the Saxon Shore Way promoted route, which runs alongside Milton Creek. With reference to the County Council's previous response to the Scoping Report dated 5 October 2018 (Appendix 19), the applicant should be aware that Natural England has proposed a route for the England Coast Path along Public Footpath ZU1 (Appendix 20). If this proposal is approved by the Secretary of State, the number of people walking this section of the coast is likely to increase, due to the enhanced promotion and status of the National Trail. The impacts of the development may therefore affect a higher number of path users than expected by the applicant.

The County Council is pleased to see that the PRoW network and its users are being considered as receptors when assessing the potential impacts of this development. The

County Council notes the applicant has considered the potential landscape and visual impacts for users of these routes. Whilst these visual impacts may on balance be considered negligible, due to the existing industrial nature of the landscape, the proposed development may have a detrimental impact on path users, due to deteriorating air quality and noise effects arising from the development.

With this in mind, improvements to the existing PRow network should be considered as mitigation for the potential impacts of the development on path users. The PRow and Access service would welcome future engagement with the applicant to consider surfacing improvements along Public Footpath ZU1/The Saxon Shore Way, which would enhance accessibility for path users. These network improvements would provide positive community outcomes for the scheme and help to mitigate any negative effects arising from the development.

Chapter 13 Archaeology and Cultural Heritage

The County Council notes that in response to previous comments made on the Scoping Report (Appendix 19), the desk-based assessment now includes the results of site investigations within the WKN site, and this shows that there are substantial deposits of made ground of a modern date present. On this basis, the County Council is satisfied with the findings of the draft ES and PEIR with respect to the archaeological potential. Any archaeological mitigation can be accommodated through an appropriate programme of investigation and recording as stated in section 13.10.2 of the Environmental Statement.

Preliminary Environmental Impact Report

The County Council notes the omission of light and light pollution within the PEIR and would encourage its inclusion in the document.

KCC also recommends that the applicant actively seeks to promote employment opportunities that arise during construction and operation of K3 and WKN, in the local labour market. This should include training and development opportunities, developed in collaboration with local educational providers e.g. construction apprenticeships.

KCC would welcome further opportunity to engage throughout the progression of the DCO. If you require further information or clarification on any matter in this letter, then please do not hesitate to contact KCC.

Yours sincerely



Barbara Cooper
Corporate Director – Growth, Environment and Transport

Encs:

- [Appendix 1](#): Overview of Planning Applications at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD
- [Appendix 2](#): SW/10/444 – Committee Report 12 April 2011
- [Appendix 3](#): SW/10/444 – Decision Notice 6 March 2012
- [Appendix 4](#): SW/10/444/R – Decision Notice 2 September 2013
- [Appendix 5](#): SW/10/444/RA – Decision Notice 18 December 2015
- [Appendix 6](#): SW/10/444/RB – Decision Notice 27 March 2017
- [Appendix 7](#): SW/10/444/RVAR – Decision Notice 23 September 2013
- [Appendix 8](#): SW/10/444/RVAR – Decision Notice 27 June 2017
- [Appendix 9](#): SW/12/1001 – Decision Notice 5 November 2012
- [Appendix 10](#): SW/13/1257 – Decision Notice 4 February 2014
- [Appendix 11](#): SW/13/1257/R – Decision Notice 21 December 2018
- [Appendix 12](#): SW/14/506680 – Decision Notice 21 April 2015
- [Appendix 13](#): SW/16/507687 – Decision Notice 9 February 2017
- [Appendix 14](#): SW/17/502996 – Decision Notice 23 August 2017
- [Appendix 15](#): SW/18/503317 – Committee Report 10 October 2018
- [Appendix 16](#): SW/18/503317 – Decision Covering Letter 11 October 2018
- [Appendix 17](#): SW/18/503317 – Decision Notice 11 October 2018
- [Appendix 18](#): SW/18/503317/R – Decision Notice 21 December 2018
- [Appendix 19](#): KCC Response to Wheelabrator K3 and WKN Scoping Report dated 5 October 2018
- [Appendix 20](#): Extract of Public Rights of Way Network Map – ZU1

SW/10/444 - Development of a sustainable energy plant to serve Kemsley Paper Mill, comprising pre-treated waste fuel reception, moving grate technology, power generation and export facility, air cooled condenser, 2 no. stacks (90 metres high), transformer, bottom ash facility, steam pipe connection, office accommodation, vehicle parking, landscaping, drainage and access at Land to the East of Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

GRANTED – 6 March 2012

SW/12/1001 - Formation of improved access road and associated development to serve Kemsley Sustainable Energy Plant at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

GRANTED – 5 November 2012

SW/10/444/RVAR - Details pursuant to conditions 6 (Rail Strategy), 10 (Contamination Risk), 11 (Buffer Management Zone), 12 (Environmental Management Plan), 13 (Archaeology), 14 (Landscaping) and 20 (Details of the Waste Bunker) of planning permission SW/10/444 at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

DETAILS APPROVED – 23 September 2013

SW/10/444/R - Application for a non-material amendment to the site layout at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

DETAILS APPROVED – 2 September 2013

SW/13/1257 - Variation of condition 6 to provide the formation of improved access road and associated development to serve Kemsley sustainable Energy Plant (SW/12/1001) at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

GRANTED – 4 February 2014

SW/14/506680 - Section 73 application to vary conditions 2 & 4 of planning permission SW/10/444 to allow a variation to the permitted hours of delivery to allow for 24 hours 7 days per week operation at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

GRANTED – 21 April 2015

SW/10/444/RA - Non-material amendment to building footprint and elevation and site layout as shown on amended plans at Land at Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

DETAILS APPROVED – 18 December 2015

SW/10/444/RB - Non-material amendments to site layout, building footprints, elevations and appearance of planning permission SW/10/444 at Kemsley Paper Mill, Ridham Avenue, Sittingbourne, Kent, ME10 2TD

DETAILS APPROVED – 27 March 2017

SW/10/444/RVAR - Details of Rail Strategy (Condition 6), Buffer Zone alongside the Western Ditch (Condition 11), Environmental Monitoring & Mitigation Plan (Condition 12), Landscaping Scheme (Condition 14) and details of Storage Bunkers (Condition 20) pursuant to planning permission SW/10/444 at Land to the East of Kemsley Paper Mill, Kemsley, Sittingbourne, Kent, ME10 2TD

DETAILS APPROVED – 27 June 2017

SW/16/507687 - The construction and operation of an Incinerator Bottom Ash (IBA) Recycling Facility on land adjacent to the Kemsley Sustainable Energy Plant at Kemsley IBA Recycling Facility, Ridham Avenue, Sittingbourne, Kent, ME10 2TD

GRANTED – 9 Feb 2017

SW/17/502996 - Section 73 application to vary the wording of condition 16 of planning permission SW/10/444 (as amended by SW/14/506680) to allow an amended surface water management scheme at the Sustainable Energy Plant to serve Kemsley Paper Mill at Land North East of Kemsley Paper Mill, Ridham Avenue, Sittingbourne, Kent, ME10 2TD

GRANTED - 23 August 2017

SW/18/503317 - Section 73 application to vary the wording of condition 3 of planning permission SW/17/502996 to increase the permitted number of HGV movements per day (from 258 to 348) in order to allow waste to be transported directly from local collection points to the Sustainable Energy Plant at Land North East of Kemsley Paper Mill, Ridham Avenue, Sittingbourne, Kent, ME10 2TD

GRANTED – 11 October 2018

SW/13/1257/R - Application for non-material amendment relating to access road layout to serve Kemsley Sustainable Energy Plant at Kemsley Paper Mill, Ridham Avenue, Kemsley, Sittingbourne, Kent ME10 2TD

APPROVED – 21 December 2018

SW/18/503317/R (INITIALLY SUBMITTED UNDER SW/10/444/R) - Application for non-material amendments relating to built elevations, appearance and site layout at Kemsley Sustainable Energy Plant, Land North East of Kemsley Paper Mill, Ridham Avenue, Kemsley, Sittingbourne, Kent ME10 2TD

DETAILS APPROVED – 21 December 2018



- Footpath
- Bridleway
- Restricted Byway
- Byway Open to All Traffic
- Point path number or status changes
- Boundary of area covered by 1:2500 scale Network Map
- Area covered by 1:2500 scale Network Map

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FOR THE COUNTY OF KENT**

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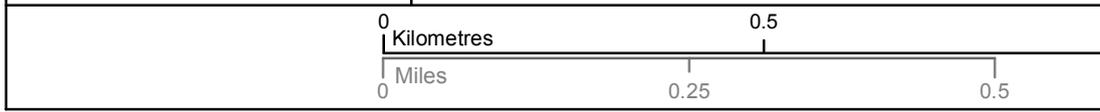
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| Issue Date: | 12/09/2018 |
| Reference: | ZU1 |

1:10,000



David Harvey

From: Graham Buckley <Graham.Buckley@dft.gov.uk>
Sent: 10 January 2019 17:03
To: info@wtikemsley.co.uk
Cc: Sarah Lomax; David Sexton; Network Services Briefing; sandra.palmer@networkrail.com; Graham Buckley
Subject: FYI: Advance Notice of CPO/DCO Powers - industry notification - Kemsley Wheelabrator

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Good afternoon

The Department for Transport is grateful for the opportunity to comment on this application. Whilst the Department does not object to the application, we are seeking further information regarding what land is planned to be compulsory purchased and whether this is in connection with the proposed enlargement of the site or the original scheme. We would be keen to see evidence that the scheme developers and the local authorities have considered with Network Rail what potential exists for a rail solution for the waste flows to the site? The Department notes a second waste to power plant, Kemsley North, at 42MW, is also proposed. The increase from 49.9MW to 75MW generating capability causes an application for an extra 107,000 tons of waste to be processed, from 550,000 to 657,000. The addition of a further 42MW generating capability adds a further 390,000 tons, taking the total annual waste processing capability to 947,000 tons, or around 2,600 tons each day. As the maximum load for a lorry would be in the region of 30 tons, an average of around 90-100 lorry movements a day into and out of the sites if the full generating capability is used is implied. In rail terms, this equates to two full containerised compacted waste trains. This is a large volume of material being moved and the Department notes that the environmental statement for the original 2012 scheme shows that all the waste material movements are expected to be by road. The Department would like to understand whether this assumption remains the same for this larger scheme. We would be grateful for further information in response to these points, as well as information on engagement with Network Rail as part of this process.

Regards
Graham Buckley

Graham Buckley | Briefing and Correspondence Manager, Rail Infrastructure South Directorate, Southeast, Anglia and Enhancements Portfolio, Department for Transport
3/23 | 0207 944 2167 | 07766 133561

From: Palmer Sandra [<mailto:Sandra.PALMER@networkrail.co.uk>]
Sent: 14 December 2018 14:09
To: Nina.Johnston-Petrou@southeasternrailway.co.uk; donna.dowman@colasrail.com; DBCargoConsultations@deutschebahn.com; procurement@drsl.co.uk; edejong@fta.co.uk; hillm@freightliner.co.uk; EXTL: Ian Kapur <Ian.Kapur@gbrailfreight.com>; maggie@rfg.org.uk; brian@acorp.uk.com; Design-OutCrime@btp.pnn.police.uk; Network Services Briefing <NetworkServicesBriefing@dft.gov.uk>; John.Sears@Transportfocus.org.uk
Cc: Sprei Stephen <Stephen.SPREI@networkrail.co.uk>; Land Disposal (ORR) <land.disposal@orr.gsi.gov.uk>
Subject: Advance Notice of CPO/DCO Powers - industry notification - Kemsley Wheelabrator

Dear Customer/ Stakeholder

With a view to ensuring that our customers and stakeholders are kept informed as regards possible compulsory acquisition of our property, Network Rail would like to inform you of the following potential compulsory purchase order (CPO).

The details are as follows:

- 1) Acquiring Council/ Authority: Wheelabrator Technologies
- 2) Location/Description: Waste to Energy Facility, Sittingbourne, Kent
- 3) Contact Details: David Harvery Tel: 01622 776226 or info@dhaplanning.co.uk

Attached to this e-mail are the following

Section 42

Further information can be found at: www.wtikemsley.co.uk

For further enquiries Tel: 0800 062 2982.

We recognise that CPOs may reflect proposals that are consistent with, or beneficial to, the operation of the railway; but alternatively may afford constraints in respect of the future use or development of the railway. This information is provided on a preliminary basis in order that you may consider whether you are likely to have any interest that you would wish to pursue direct with the prospective acquiring authority (in which case we would be grateful if you will copy in Network Rail).

If you have any comments, could you please send them no later than 5pm on Thursday 10th January 2019 to Freepost Wheelabrator Kemsley or info@wtikemsley.co.uk. Could you please also copy in Network Rail.

Network Rail will in the meantime be considering its position on the potential CPO/DCO.

Regards

Landinformation

Onsite | Office | Online



Sandra Palmer

Clearance Administrator | Property | Network Rail

Land Clearance Team

Desk 47 | One Eversholt St | London | NW1 2DN

Telephone: 020 7904 7253 **Mobile:** 07880 503935

Email: Sandra.palmer@networkrail.co.uk

www.networkrail.co.uk/property

Advance Notice: I am on leave Monday 10th December and Monday 17th December 2018

Please note: Any Land Clearances submitted will now be circulated w/c 7th January 2019

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