



Wheelabrator
TECHNOLOGIES



Deadline 2: Applicant's Response to Local Impact Reports

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

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement has been prepared at Deadline 2 of the Examination by the Planning Inspectorate into an application by WTI/EFW Holdings Ltd (a subsidiary of Wheelabrator Technologies Inc – “WTI”) under the Planning Act 2008 for a Development Consent Order (a “DCO”) for the construction and operation of the Wheelabrator Kemsley (“K3”) and Wheelabrator Kemsley North (“WKN”) waste-to-energy generating stations on land at Kemsley, Sittingbourne in Kent.
- 1.1.2 This Statement provides the response by the applicant to the Local Impact Reports submitted to the Examining Authority regarding the proposed development.
- 1.1.3 For ease and completeness this document briefly summarises the proposed development and identifies the application site before providing the applicant’s comments on the Local Impact Reports. The Local Impact Reports are not replicated within this document but can be viewed on the project page of the Planning Inspectorate’s website:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/wheelabrator-kemsley-generating-station-k3-and-wheelabrator-kemsley-north-wkn-waste-to-energy-facility/?ipcsection=docs>

1.2 Context

- 1.1.1 The application for a Development Consent Order will seek consent for the construction and operation of a 75MW waste-to-energy facility, ‘the Wheelabrator Kemsley Generating Station’ (“K3”) and for the construction and operation of a 42MW waste-to-energy facility, ‘Wheelabrator Kemsley North’ (“WKN”).
- 1.1.2 K3 is a waste-to-energy facility located adjacent to and east of the DS Smith Kemsley paper mill, to the north of Sittingbourne, Kent. Planning permission was granted for K3 in 2012 by Kent County Council with a generating capacity of 49.9MW and a waste processing capacity of 550,000 tonnes per annum. The facility is now substantially constructed and is expected to be operational in Q2 2020.
- 1.1.3 The applicant has identified that K3 would be capable of processing an additional 107,000 tonnes of waste per annum and, without any change to the external design, generating an additional 25.1MW of electricity. However, in order for the K3 project to be properly categorised and consented under the Planning Act 2008 the applicant is required to seek consent for the construction of K3 at its total generating capacity of 75MW (i.e. 49.9MW consented + 25.1MW upgrade), together with the separate proposed total tonnage throughput of 657,000 tonnes per annum (550,000 consented + 107,000 tonnage increase).
- 1.1.4 The proposed new Waste-to-Energy plant, Wheelabrator Kemsley North (WKN), would be a single 125Mwth line facility capable of processing 390,000 tonnes of waste per annum, with a generating capacity of 42MW. WKN is not therefore a

Nationally Significant Infrastructure Project (NSIP) by virtue of its generating capacity.

- 1.1.5 Instead WTI made a formal application on the 1st June 2018 to the Secretary of State (SoS) for Business, Energy and Industrial Strategy under Section 35 of the Planning Act 2008 for a direction as to whether the project is nationally significant. The SoS issued their direction on the 27th June 2018 confirming that WKN is to be considered and treated as a development which requires development consent due to its context with other nationally significant projects in the vicinity, the benefits to K3 and WKN being assessed comprehensively through the same DCO process and the removal of the need for separate consents to be sought.
- 1.1.6 A single Development Consent Order will be sought for K3 and WKN through a single application to the Planning Inspectorate (PINS), prior to being determined by the Secretary of State (SoS) for Business, Energy and Industrial Strategy.

1.3 The Site and its surroundings

- 1.3.1 The K3 and WKN sites lie to the north-east of the village of Kemsley, which itself sits at the north-eastern edge of Sittingbourne in Kent. The K3 and WKN sites lie immediately to the east of the Kemsley Paper Mill, a substantial industrial complex which is operated by DS Smith.
- 1.3.2 In April 2018 DS Smith lodged an application for a Development Consent Order (DCO) which would allow for the construction and operation of 'K4', a gas fired Combined Heat and Power Plant within the Kemsley Mill site. This DCO was granted on 5th July 2019.

1.1 Proposed Development

Wheelabrator Kemsley – K3

- 1.1.1 Planning permission was granted for K3 in 2012 by Kent County Council under reference SW/10/444. As consented and being constructed, K3 can process up to 550,000 tonnes of waste each year and has a generation capacity of 49.9MW. K3 will export electricity to the grid and will supply steam to the DS Smith Kemsley Paper Mill. The construction of K3 began in 2016 and is now significantly advanced, with WTI anticipating K3 will be operational in Q2 2020.
- 1.1.2 WTI has identified that K3 would be capable of processing an additional 107,000 tonnes of waste per annum and, without any change to the external design, generating an additional 25.1MW of electricity.
- 1.1.3 The 2018 consultation and publicity sought views from interested parties on an application for consent for that power upgrade and increased tonnage throughput, without any construction works being required, as an extension to the K3 facility under Section 15 of the Planning Act 2008.
- 1.1.4 However, in order for the K3 project to be properly categorised and consented under the Planning Act 2008 the applicant is now seeking consent for the

construction of K3 at its total generating capacity of 75MW (49.9MW consented + 25.1MW upgrade), together with the separate proposed total tonnage throughput of 657,000 tonnes per annum (550,000 consented + 107,000 tonnage increase).

- 1.1.5 A further consultation was undertaken in 2019 to advise S42 consultees and notify the public through a number of S48 notices that construction and operation of K3 is now being sought as part of the DCO, in the context of the K3 facility already being substantially constructed.
- 1.1.6 As the K3 facility is currently being constructed and will be operational by the end of 2019 the effect in reality of the proposed application ('the practical effect') would retain the K3 facility as consented but generating an additional 25.1MW together with being able to process an additional 107,000 tonnes of waste per year.

Wheelabrator Kemsley North – WKN

- 1.1.7 WKN would be an entirely new and separate waste-to-energy facility on land to the north of K3, which is currently being used as the K3 construction laydown area. WKN would provide clean, sustainable electricity to power UK homes and businesses via the National Grid distribution network and would have the ability to export steam should a user for that steam become available.
- 1.1.8 WKN would have a generating capacity of 42MW and a waste processing capacity of 390,000 tonnes per annum and be a self-contained and fully enclosed facility with its own reception hall, waste fuel bunker, boiler, flue gas treatment, turbine, air-cooled condensers, transformers, office accommodation, weighbridge, administration building, car parking and drainage. WKN would have its own grid connection to allow for the exporting of electricity to the national grid.

2 Applicant’s Responses to Kent County Council’s Local Impact Report

2.1 Minerals and Waste (as Minerals and Waste Planning Authority)

2.1.1 KCC refers to their comments made in their Written Representation and Annex 1 of the Written Representation. The Applicant has provided a comprehensive response to these comments in Appendix 1 of the Applicant’s Response to the Written Representations at Deadline 2 [Document 10.4].

2.2 Highways (as the Local Highway Authority)

Baseline Conditions

2.2.1 The Applicant notes paragraph 7.4 in which KCC confirm that they now accept the baseline position set out within the Transport Assessment and the ES.

2.2.2 In response to paragraph 7.5 of the KCC LIR, the Applicant confirms that IBA has been considered adequately within the assessment. Paragraph 5.19 of the Transport Assessment confirms that the vehicle movements associated with the consented IBA facility (reference 16/507687/COUNTY) have not been included within the baseline. Given that the consented IBA facility is on the site of the WKN Proposed Development, the consented IBA facility is not included within the cumulative assessment, as evidenced from paragraph 5.32 of the Transport Assessment.

2.2.3 The Transport Assessment prepared for the consented K3 facility (application ref SW/10/444) estimated a total of 258 HGV movements per day. This included an allowance for 165,000 tonnes per annum of IBA being exported, which its Transport Assessment calculated to equate to 58 HGV movements per day.

2.2.4 Irrespective of whether there is an IBA processing facility on site or not, a HGV is required to arrive on site to export either IBA (unprocessed) or IBAA (processed). The annual tonnage for IBAA may be slightly less than that of IBA due to moisture loss as a result of the process, therefore, the number of HGVs associated with IBA may be higher than that of IBAA. The Transport Assessment prepared for the consented K3 facility based its calculations on IBA being exported.

2.2.5 The planning application for the IBA facility (reference 16/507687/COUNTY) was based upon IBA being delivered externally (i.e. not from K3) and then exported as IBAA to ensure commercial advantage whereby its consent was not tied to K3. If its consent was tied to K3, then the requirement for HGV movements would be minimal because those HGV movements would already be accounted for as part of the K3 planning consent. The IBA planning consent enabled 80 HGV movements per day over and above those consented for K3.

2.2.6 Those 80 HGV movements per day have not been included in any of the submitted assessments. The removal of the IBA facility therefore does not affect any of the submitted assessments.

Trip Generation

- 2.2.7 The Applicant met with KCC on 10 February 2020, during which the trip generation elements KCC raise in paragraphs 7.6 to 7.9 of their LIR were discussed.
- 2.2.8 During that meeting the applicant explained that the HGV generation is based upon 75% of all movements being generated during daytime periods and 25% of all HGV movements being generated during night time periods. The applicant explained that this was the assumption made for K3 as part of its Section 73 application (reference SW/14/506680) to enable 24/7 working. This detail is set out at paragraph 6.14 of the Transport Assessment.
- 2.2.9 The applicant has also undertaken sensitivity assessments whereby all HGV movements occur during only daytime periods.
- 2.2.10 Notwithstanding, during the meeting on 10 February 2020, KCC advised that they were able to obtain HGV movement data for the Waste to Energy facility at Allington, Kent and suggested that the Applicant do likewise for their operational facility at Ferrybridge, Yorkshire. The Applicant and KCC discussed the differences between the facilities at Ferrybridge and Allington in comparison to the K3 and WKN Proposed Developments, in particular neither have 24/7 HGV access, Allington is a municipal facility with a majority of local Refuse Collection Vehicles whilst Ferrybridge comprises a high proportion of feed from the Barnsley, Doncaster and Rotherham (BDR) waste facility which skews its HGV movements away from what would be considered average.
- 2.2.11 The Applicant and KCC both acknowledged these differences and that the HGV movement data from Ferrybridge and Allington is expected to be different to that for the K3 and WKN Proposed Developments. Nonetheless, the Applicant has agreed to obtain and share the HGV movement data for Ferrybridge and KCC has agreed to obtain and share the HGV movement data for Allington. The Applicant and KCC has agreed to review the HGV movement data for Ferrybridge and Allington in the context of the K3 and WKN Proposed Developments, whilst being mindful of the differences between the facilities. The Applicant is currently obtaining the HGV movement data for Ferrybridge and will share this with KCC.
- 2.2.12 The Applicant notes paragraphs 7.10 and 7.11 in which KCC confirm that they now accept the construction traffic assumptions set out within the Transport Assessment and the ES.

Impact on the Existing Highway Network

- 2.2.13 The Applicant notes paragraph 7.12 in which KCC does not agree with the conclusions drawn in paragraphs 6.47, 6.69 and 6.94 of the Transport Assessment and considers that due to the known constraints on the network it is appropriate to consider the cumulative impact that all developments will have.
- 2.2.14 The conclusions being drawn were KCC’s own conclusions from their Section 42 consultation response to the K4 DCO application on 2nd March 2018. At that

- time, the constraints on the network were already known and these have not changed in the period since.
- 2.2.15 At that time there were also other emerging developments such as the North West Sittingbourne and Iwade residential allocations and planning applications, all of which were cumulative developments.
- 2.2.16 There is therefore no difference from the situation on 2nd March 2018 to now and KCCs comments that applied then, equally apply now.
- 2.2.17 The Applicant notes KCCs comments in paragraph 7.14 relating to junction performance and queuing at the Swale Way / Barge Way junction. The Applicant directs the ExA to paragraphs 14.47 to 14.50 of the Transport Assessment which explains how the traffic modelling software is unreliable under congested conditions but acts as a useful aid in the assessment process; this is accepted within the industry and has been well rehearsed at numerous Public Inquiries over the years. The remainder of Section 14 of the Transport Assessment therefore builds upon the junction assessments undertaken and examines the impact of development with Tables 14.2 and 14.3 being particularly relevant.
- 2.2.18 Table 14.2 shows that the K3 and WKN Proposed Developments would increase traffic flows on the eastbound Swale Way entry to the Barge Way roundabout from 1,441 to 1,452 (+11 vehicle movements) during the AM peak hour (07:30 to 08:30). This is one additional vehicle movement every five and a half minutes. However, despite, this, Table 14.2 shows that the traffic modelling predicts the maximum queue on the eastbound Swale Way entry to increase from 84.9 vehicles to 94.5 vehicles. This is demonstration of the unreliability of the traffic models in congested conditions, as described in paragraphs 14.47 to 14.50 of the Transport Assessment.
- 2.2.19 Table 14.3 (sensitivity assessment) shows that if all HGV movements were during daytime periods only, the K3 and WKN Proposed Developments would increase traffic flows on the eastbound Swale Way entry to the Barge Way roundabout from 1,441 to 1,454 (+13 vehicle movements) during the AM peak hour (07:30 to 08:30). This is one additional vehicle movement every four and a half minutes. However, despite, this, Table 14.3 shows that the traffic modelling predicts the maximum queue on the eastbound Swale Way entry to increase from 84.9 vehicles to 97.1 vehicles. This is further demonstration of the unreliability of the traffic models in congested conditions, as described in paragraphs 14.47 to 14.50 of the Transport Assessment.
- 2.2.20 It is for this reason for Section 14 of the Transport Assessment; to consider the absolute increases in traffic flows by the K3 and WKN Proposed Developments and to form a judgement on this rather than rely upon traffic modelling software, which is accepted within the industry to be unreliable in congested conditions.
- 2.2.21 Therefore, the comments made at paragraph 7.14 in KCCs LIR regarding changes in queue lengths need to be considered in this context and the qualification of the changes in traffic flows examined in Section 14 of the Transport Assessment must be a key consideration.

- 2.2.22 In paragraph 7.14 of their LIR, KCC set out that ‘the 2017 base reported queue is 4.4 and it is unclear how in 2024 the Ratio of Flow to Capacity (RFC) has increased to 67 due to committed development flows particularly as the Appendix E “Committed development traffic Flow diagram” only shows four opposing movements from Swale Way South to Barge Way’. Although KCC state the Ratio of Flow to Capacity (RFC), this is in fact the queue. KCC correctly set out that in this scenario the committed developments in 2024 would increase the opposing vehicle movements from Swale Way to Barge Way by 4 vehicle movements, as shown at Appendix E of the Transport Assessment. However, what also causes the queue on the eastbound Swale Way entry in this scenario, and is the main contributor, is the increase of 310 vehicle movements on that movement, all of which are committed developments, as also shown at Appendix E of the Transport Assessment. Thus, there is a combined additional 314 opposing vehicle movements at the Swale Way / Barge Way roundabout in this scenario which increase the queue on the eastbound Swale Way entry from 4.4 vehicles to 67 vehicles.
- 2.2.23 In relation to KCC’s point on Table 14.3 of the Transport Assessment, the queue length on the eastbound Swale Way entry to its roundabout with Barge Way is 4.4 vehicles in the 2017 scenario and 84.9 vehicles in both the 2024 and 2031 baseline scenarios. These queue lengths are correct. The estimation of 2024 and 2031 baseline scenarios is set out in Section 5 of the Transport Assessment and explains that traffic growth rates have not been applied because the number of dwellings and employment included in future years by other committed and cumulative developments far exceeds the number of dwellings and employment contained within TEMPRO and the methodology adopted in Section 5 of the Transport Assessment is robust as it already incorporates more than the equivalent TEMPRO estimates. The Applicant notes from paragraph 7.4 of the LIR that KCC have accepted this methodology and that KCC are now satisfied that the baseline conditions used in the traffic modelling are acceptable to them.
- 2.2.24 The Applicant notes paragraphs 7.15 and 7.16 in which KCC discuss sensitivity testing. The applicant met with KCC on 10 February 2020, during which the Applicant asked KCC to provide details on the traffic modelling undertaken at the A249 Grovehurst junction as part of its Housing Infrastructure Fund application. Specifically, the Applicant asked KCC to provide details on the assumptions behind the modelling in terms of the allowances made for other developments within the modelled traffic flows. KCC has agreed to this and will provide these assumptions to the Applicant. Upon receipt of these assumptions, the Applicant is committed to working with KCC to determine if there is a requirement to undertake any additional sensitivity modelling work.
- 2.2.25 Notwithstanding the above, the Applicant notes KCC’s predicted timescales for the A249 Grovehurst junction improvement works commencing in 2021 and, in paragraph 7.21 of their LIR, sets out that this would continue for around 18 months. This suggests that significant improvements to highway capacity could be provided at the junction by mid 2022 / 2023.
- 2.2.26 The Applicant is aware of the residential planning applications for South Iwade, North Iwade, Land Adjacent to Quinton and Phase 1 of NW Sittingbourne. The

applicant is aware that as part of their discussions with KCC and Swale Borough Council, these developments are agreeing to the imposition of planning conditions that will restrict their full occupation until the A249 Grovehurst scheme is open to traffic. There must therefore be a significant degree of confidence that the A249 Grovehurst scheme will progress in accordance with these timescales, otherwise these developers would be unlikely to agree to such planning conditions for commercial reasons.

- 2.2.27 The Applicant notes that WKN will not be operational until 2024 which would therefore be after the opening of the A249 Grovehurst improvement scheme.
- 2.2.28 It is assumed that KCC can provide assurance to the ExA on the deliverability of the A249 Grovehurst junction scheme providing improvements to highway capacity by mid 2022 / 2023.
- 2.2.29 As part of those discussions between the applicants of the residential planning applications and KCC, the Applicant understands that KCC is agreeing development thresholds before infrastructure is required, for example, KCC have agreed that 450 dwellings can be occupied at North West Sittingbourne before highway improvements would be required at the A249 Bobbing junction (which, alongside the A249 Grovehurst junction improvement works, formed part of the HIF monies secured by KCC).
- 2.2.30 The Applicant notes from KCCs latest consultation response on the Land North of Quinton Road application that KCC will shortly provide their requirements in terms of development triggers for the A249 Grovehurst junction.
- 2.2.31 In this regard, it is relevant to note that Highways England have changed their position on this issue. HE’s Relevant Representations dated 4th December state 'Highways England cannot allow any further development that is likely to impact on M2 Junction 5 in its current format without appropriate mitigations' and 'Highways England will seek Grampian condition(s) which would prohibit the DCO proposals being brought into use until such time as both schemes [M2 Junction 5 and A249 Grovehurst roundabout schemes] were completed and open to public traffic in full'. The Applicant then met with HE on 28th January 2020 where HE confirmed this position and confirmed it was a position being taken for all other developments that would generate traffic through the M2 Junction 5.
- 2.2.32 However, HE have stated in their February 2020 consultation responses to these residential planning applications that the South Iwade (70 dwellings) and a proportion of NW Sittingbourne (91 dwellings) can proceed before any highway works at either M2 Junction 5 or the A249 Grovehurst junction.
- 2.2.33 The Applicant notes that HE has not submitted its Local Impact Report. Given their recent change in position for the South Iwade and NW Sittingbourne applications, the Applicant assumes that HE will adopt a similar and consistent position for the K3 and WKN Proposed Developments and through their discussions with HE the Applicant will be seeking confirmation on this shift in position in order to confirm that the K3 and WKN Proposed Developments will be

considered in the same and consistent manner being able to progress prior to highway improvement works being implemented.

Mitigation

- 2.2.34 The Applicant notes paragraphs 7.17 to 7.19 of KCCs LIR. An examination of the impact is set out in Section 14 of the Transport Assessment and concludes that the K3 and WKN Proposed Developments would not create an impact which is unacceptable or severe, thus mitigation is not substantiated.
- 2.2.35 Notwithstanding, paragraph 7.17 of KCCs LIR seeks mitigation that would redress the impact by the K3 and WKN Proposed Developments. The Applicant submits that this is not policy compliant, and that developments should only be refused consent for traffic impact reasons if the residual cumulative impact on the road network is severe (not nil-detriment).

Project Construction Programme

- 2.2.36 The Applicant notes paragraph 7.23 of KCC’s LIR which suggests that no construction works should commence at the WKN Proposed Development until both the M2 Junction 5 and A249 Grovehurst junction improvement works are completed.
- 2.2.37 During the highway works at these two junction improvement schemes, traffic management measures will necessarily be implemented in accordance with legislation (the Traffic Management Act, 2004) and guidance (Traffic Signs Manual Chapter 8: Traffic Safety Measures and Signs for Road Works and Temporary Situations, Department for Transport et al, 2020) with the health and safety and wellbeing of all road users and construction workforce at the forefront.
- 2.2.38 These traffic management measures are typically implemented at the expense of introducing network constraints. However, this is short term and is a known consequence and necessity of undertaking such works to ultimately provide a long term benefit.
- 2.2.39 The network constraints as a result of the traffic management that would be implemented at these junctions during their highway works would apply to all traffic on the network.
- 2.2.40 The construction traffic generated by the WKN Proposed Development is negligible in the context of other traffic flows on the network and they should be considered in that context. Indeed, Table 4.17 of the ES sets out that the peak construction traffic of the WKN Proposed Development would represent no more than 2% of baseline weekday traffic flows on the A249 between the M2 and Swale Way; during average construction periods, the construction traffic of the WKN Proposed Development would be less than this and thus represent an even lower contribution.

2.3 Public Rights of Way (as Local Highway Authority)

- 2.3.1 As set out in the Applicant’s response to ExQ 1.14.1, the Applicant does not consider that the proposed development would give rise to detrimental impacts in air quality or noise terms on users of the public right of way particularly given they would have a transitory short term presence. The Applicant’s view is therefore that a contribution towards footpath improvements would not be necessary to make the development acceptable in planning terms.

2.4 Sustainable Urban Drainage Systems (as Lead Local Flood Authority)

- 2.4.1 The Applicant acknowledges KCC’s acceptance of the Flood Risk Assessment and Surface Water Management Design and Foul Drainage Design Philosophy Statement.

2.5 Heritage Conservation

- 2.5.1 The Applicant acknowledges KCC’s agreement that the proposed archaeological mitigation can be addressed through a programme of archaeological work and will be secured through the DCO.
- 2.5.2 The Applicant acknowledges KCC’s deferral to Historic England regarding the Scheduled Monument - Castle Rough.

2.6 Biodiversity

- 2.6.1 The Applicant acknowledges KCC’s deferral to Natural England regarding the Swale Special Protection Area, Special Site of Scientific Interest and Ramsar sites. The Applicant acknowledges KCC’s satisfaction regarding sufficient information has been provided in relation to the potential impacts on the designated sites.

2.7 Public Health

- 2.7.1 Impacts related to air quality have been assessed in the Chapter 5 of the ES and are not considered significant subject to the implementation of the relevant migration measures.

3 Applicant’s Responses to Swale Borough Council’s Local Impact Report

3.1 Landscape and Visual Impact

3.1.1 The Applicant acknowledges the Council’s assessment of the landscape character and notes that that Council accepts the proposed development forms part of the existing industrial scene.

3.2 Residential Amenity

3.2.1 The Applicant acknowledges the Council’s assessment that the nearest dwelling is around 800m from the proposed development.

3.3 Cultural Heritage

3.3.1 The Applicant acknowledges the Council’s assessment and its referral to Historic England’s Relevant Representation.

3.4 Economy

3.4.1 The Applicant acknowledges that the Council welcomes the proposed job creation arising from the proposed development and that the development does not prejudice job creation as it is not located on an allocation for employment use in the Local Plan.

3.5 Noise and Vibration

3.5.1 The Applicant acknowledges the Council’s agreement with the Applicant’s assessment of noise and vibration.

3.6 Air Quality

3.6.1 The Applicant acknowledges the Council’s agreement with the Applicant’s assessment of air quality.

3.7 Land Contamination

3.7.1 The Applicant acknowledges the Council’s agreement with the Applicant’s assessment of contaminated land.

3.8 Comments on draft DCO general requirement wording

3.8.1 The Council have requested to amended Requirement 29 part 1 to add “and in consultation with the Economic Development Officer at Swale Borough Council” after “planning authority”. The Applicant agrees to this amendment which has been included in the revised draft DCO submitted at Deadline 2.

- 3.8.2 The Council have also requested that a requirement is added which reflects the stance in Policy DM19 of the Local Plan in which developments over 1,000 square metres floor area is that they “should aim to achieve the BREEAM very good standard or an equivalent as a minimum”. The Applicant has not proposed an amendment to the dDCO to that effect. The K3 facility was not subject to any condition requiring compliance with BREEAM and the Applicant’s current position is that WKN would include similarly sustainable construction methods to those used on K3, such as the use of robust materials, the specification of appropriate efficient internal systems (i.e. water and heating) where appropriate and rainwater harvesting, and that it is not necessary for a facility of the type proposed to be formally assessed through BREEAM.