



**Document 3.1- ES Volume 2**  
**Appendix 10.1 Consultation with KCC**  
**Ecology**

**The Kemsley Mill K4 Combined Heat and**  
**Power Generating Station Development**  
**Consent Order**

**Planning Act 2008 The Infrastructure Planning**  
**(Applications: Prescribed Forms and**  
**Procedure) Regulations 2009**  
**Regulation 5(2)q**

**April 2018 - Submission Version**

**PINS Ref: EN010090**

## Nick Betson

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**From:** Nathan.Coughlan@kent.gov.uk  
**Sent:** 31 October 2017 16:35  
**To:** Nick Betson  
**Subject:** [EXT] RE: Kemsley K4

Hi Nick,

Yes happy with the approach outlined below in regards to cetti's warbler.

Kind regards,

Nathan.

**Nathan Coughlan** | Biodiversity Officer | Environment, Planning and Enforcement | Kent County Council |  
1st Floor, Invicta House, Maidstone, ME14 1XX | Internal: 419442 | External: 03000 419442 |  
[Nathan.Coughlan@Kent.gov.uk](mailto:Nathan.Coughlan@Kent.gov.uk) | [www.kent.gov.uk](http://www.kent.gov.uk) | [@kent\\_cc](https://twitter.com/kent_cc)

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**From:** Nick Betson [mailto:Nick.Betson@rpsgroup.com]  
**Sent:** 25 October 2017 10:02  
**To:** Coughlan, Nathan - GT EPE  
**Cc:** Forster, Helen - GT EPE  
**Subject:** RE: Kemsley K4

Hi Nathan,

Many thanks for the response – that's very helpful.

With respect to the requirement for breeding bird surveys, although we haven't surveyed this particular area before, we have surveyed much of the rest of the paper mill on numerous occasions and have a relatively consistent assemblage, the most interesting species being Cetti's Warbler. Given the scrub habitat to the south of the K4 site, around the Light Railway Station, is certainly suitable for this species, we are going to assume at this stage that this species will be present and will assess impacts accordingly; are you happy with this approach?

Kind regards,  
Nick

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**From:** [Nathan.Coughlan@kent.gov.uk](mailto:Nathan.Coughlan@kent.gov.uk) [mailto:Nathan.Coughlan@kent.gov.uk]  
**Sent:** 24 October 2017 09:41  
**To:** Nick Betson <[Nick.Betson@rpsgroup.com](mailto:Nick.Betson@rpsgroup.com)>  
**Cc:** [Helen.Forster@kent.gov.uk](mailto:Helen.Forster@kent.gov.uk)  
**Subject:** [EXT] RE: Kemsley K4

Hi Nick,

Thanks for your email, and apologies for the delay in responding.

As the data is from 2016 and as you have mentioned that you have four years worth of data, we consider that this is sufficient to have a good understanding of the ecological impacts. Therefore, we'd be happy if you proceeded on that basis. I'm unsure of the anticipated submission date, however if there is a significant delay in the submission of any application (>2 years) we would expect updated surveys to be undertaken.

Kind regards,

Nathan.

**Nathan Coughlan** | Biodiversity Officer | Environment, Planning and Enforcement | Kent County Council | 1st Floor, Invicta House, Maidstone, ME14 1XX | Internal: 419442 | External: 03000 419442 | [Nathan.Coughlan@Kent.gov.uk](mailto:Nathan.Coughlan@Kent.gov.uk) | [www.kent.gov.uk](http://www.kent.gov.uk) | [@kent\\_cc](https://twitter.com/kent_cc)

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**From:** [Helen.Forster@kent.gov.uk](mailto:Helen.Forster@kent.gov.uk) [<mailto:Helen.Forster@kent.gov.uk>]

**Sent:** 12 October 2017 17:39

**To:** Nick Betson <[Nick.Betson@rpsgroup.com](mailto:Nick.Betson@rpsgroup.com)>

**Subject:** [EXT] RE: Kemsley K4

Ni Nick,

Thank you for your email.

My colleague Nathan Coughlan commented on the scoping opinion (which is why I didn't recognise the site!)

He will be in touch in response to your email.

Thanks,

Helen

**Helen Forster MCIEEM** | Biodiversity Officer | **Kent County Council**

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**From:** Nick Betson [<mailto:Nick.Betson@rpsgroup.com>]

**Sent:** 12 October 2017 15:19

**To:** Forster, Helen - GT EPE

**Subject:** Kemsley K4

Hi Helen,

I hope you're well,

I'm not sure if it was yourself or one of your colleagues that provided comment on the recently submitted Scoping Opinion for the Kemsley K4 CHP DCO. There was a comment with respect to doing further wintering/breeding bird surveys to inform the assessment. We have completed wintering surveys covering the nearest area of foreshore during 2016 (all months except June); would you be happy with us using these data to support the K4 application? Ultimately, we've undertaken surveys along the Kemsley foreshore during four years over the last 10 so have a good idea with respect to its usage by SPA interest birds. There is also the work that was undertaken for the Swale Way bridge that would form further background.

With respect to the need for breeding bird surveys, the development footprint is only existing hardstanding within the paper mill site. The nearest area of suitable habitat is the dense scrub between the papermill and the Sittingbourne Light Railway circa 50 m south of the site on the far side of the lagoons. Given our experience of the rest of the papermill site, it is safe to assume that this scrub supports breeding Cetti's warblers as the habitat is suitable and this species appears to occur in good numbers in all such habitat around the mill. Therefore, we'll be incorporating any necessary mitigation to avoid disturbance of these birds during breeding but weren't proposing to undertake breeding bird surveys of these off site areas; are you happy for us to proceed on this basis?

If you'd like to discuss this with me, I'm on my mobile below.

Many thanks in advance,

Nick

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