



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

PINS Ref: EN010090



Environmental Statement Volume 3: Non-Technical Summary

Document 3.2

Author: DHA Environment and RPS



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

April 2018 - Submission Version

Introduction

DS Smith Paper Limited (“the Applicant”) is seeking permission to decommission an existing gas fired Combined Heat and Power (“CHP”) Plant and build a new gas-fired CHP plant (“K4”) with a nominal power output of 68-73 megawatts (the “Proposed Development”) on land at Kemsley Paper Mill (“the Site”) to be operated by DS Smith and/or other companies to supply electricity and steam to their existing Kemsley Paper Mill, in Sittingbourne, Kent (“The Mill”).

The Planning Act 2008 states that the construction or extension of an onshore generating station with a generating capacity of more than 50MW in England or Wales is considered within Section 14(1) (a) of the Act to be a ‘nationally significant infrastructure project’ and as such requires an application for a Development Consent Order (DCO) to be made to the Planning Inspectorate and approved by the Secretary of State for Business, Energy and Industrial Strategy. Such an application has therefore been prepared by DS Smith Paper Ltd. As part of this an Environmental Impact Assessment (EIA) has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to identify the potentially significant environmental effects of the scheme. The results of this assessment are reported in the main Environmental Statement (ES) submitted with the application to the SoS (Document 3.1).

This document provides a non-technical summary of the results of the EIA undertaken.

What is the purpose of EIA?

The purpose of Environmental Impact Assessment (EIA) is to identify the likely **significant** effects of a planned development, positive or negative, to some aspect of the environment whether natural or man made (a receptor). Both the sensitivity of the environmental receptors being affected and the magnitude of the impact inform the significance of the effect. The findings of the EIA are then presented in a document known as an Environmental Statement (ES) (Documents 4.2 and 4.3).

The significant environmental effects of the Proposed Development during the construction, operation and future decommissioning of K4 has been assessed in the ES by appropriate technical experts.

Where a particular environmental feature, or component of it, has not been included within an EIA, this is not to suggest that there will be no associated effects; rather that these are not considered to be among the potentially significant effects.

Where feasible, mitigation measures have been proposed to avoid/reduce an adverse effect identified. A reassessment of an effect with this mitigation in place is then undertaken to determine its significance post mitigation.

Any significant environmental effects remaining after mitigation are reported and represent the likely residual effects of the Proposed Development on the environment (if any).

Where identified, significant effects are required to be taken into account in the application decision making process by the SoS. If consent is granted mitigation measures are secured by requirements within the DCO to ensure they are implemented.

What issues have been assessed?

A formal scoping opinion request was made to PINS in July 2017 to agree the scope of the topics to be included in the EIA in consultation with the relevant statutory consultees i.e. Kent County Council (KCC) Highways, the Environment Agency, Natural England etc. A copy of the formal scoping opinion is publicly available on PINS website at the Kemsley Paper Mill (K4) CHP Plant project page and is also provided as Appendix 3.2 in Document 3.1.

Consequently it was agreed that the following topic areas need to be assessed within the EIA, a summary of the results of which is provided within this document:

- Traffic and transport
- Air Quality (including human health)
- Greenhouse Gases and Climate Change
- Noise and Vibration
- Ground contamination
- Water Environment
- Ecology
- Landscape and Visual Effects
- Cultural Heritage
- Cumulative effects

The EIA has been undertaken in accordance with the formal scoping opinion.

Subsequent to the Scoping Opinion a draft ES was produced and further consultation with statutory consultees and members of the public was undertaken in February 2018 in accordance with Section 42 and 48 of the Planning Act 2008. All comments pursuant to this consultation process have been addressed in the final ES. Further details on the consultation and scoping process are available in Chapter 3 of the main ES (Document 3.1).

The Proposal Site

The Site lies in the south east corner of the existing Kemsley Paper Mill site approximately 600m west of the Swale Estuary and north of Milton Creek in the Borough of Swale, Kent.

The Site is accessed from the A249 via Swale Way. An internal access road provides access to the proposal site. The site is comprised almost entirely of existing concrete hard standing.

The Kemsley Paper Mill lies immediately east of the Kemsley residential suburb of Sittingbourne with the town centre some 2.5km south of the site.

DS Smith bought Kemsley Paper Mill in 2008, investing over £100m to upgrade facilities to make lightweight corrugated case material (CCM). This is the first recycled lightweight paper manufactured in the UK. Kemsley Mill has an annual production capacity of around 800,000 tonnes made from 100% recycled waste paper and is the second biggest recovered fibre-based paper operation in Europe. Figure 1 below shows the location of the Site and its context within the Mill.



Figure 1: Site location plan showing red line boundary of the DCO application.

The Site lies in proximity to a number of sensitive areas and sites which could be potentially affected by the Proposed Development and have therefore been assessed within the EIA. The main sensitive sites/areas are listed below and their location illustrated in Figure 2:

- The Swale Special Protection Area, Special Site of Scientific Interest and Ramsar site designated for its grazing marshes and estuarine habitats and the assemblage of breeding and overwintering birds it supports
- ‘Castle Rough’ a Medieval moated site (Scheduled Monument)
- Local residents in the Kemsley area of Sittingbourne
- The A249 and local highways network
- The River Swale
- The Saxon Shore Way Public Right of Way

It should be noted that this is not an exhaustive list but identifies the main sensitive sites/areas only.

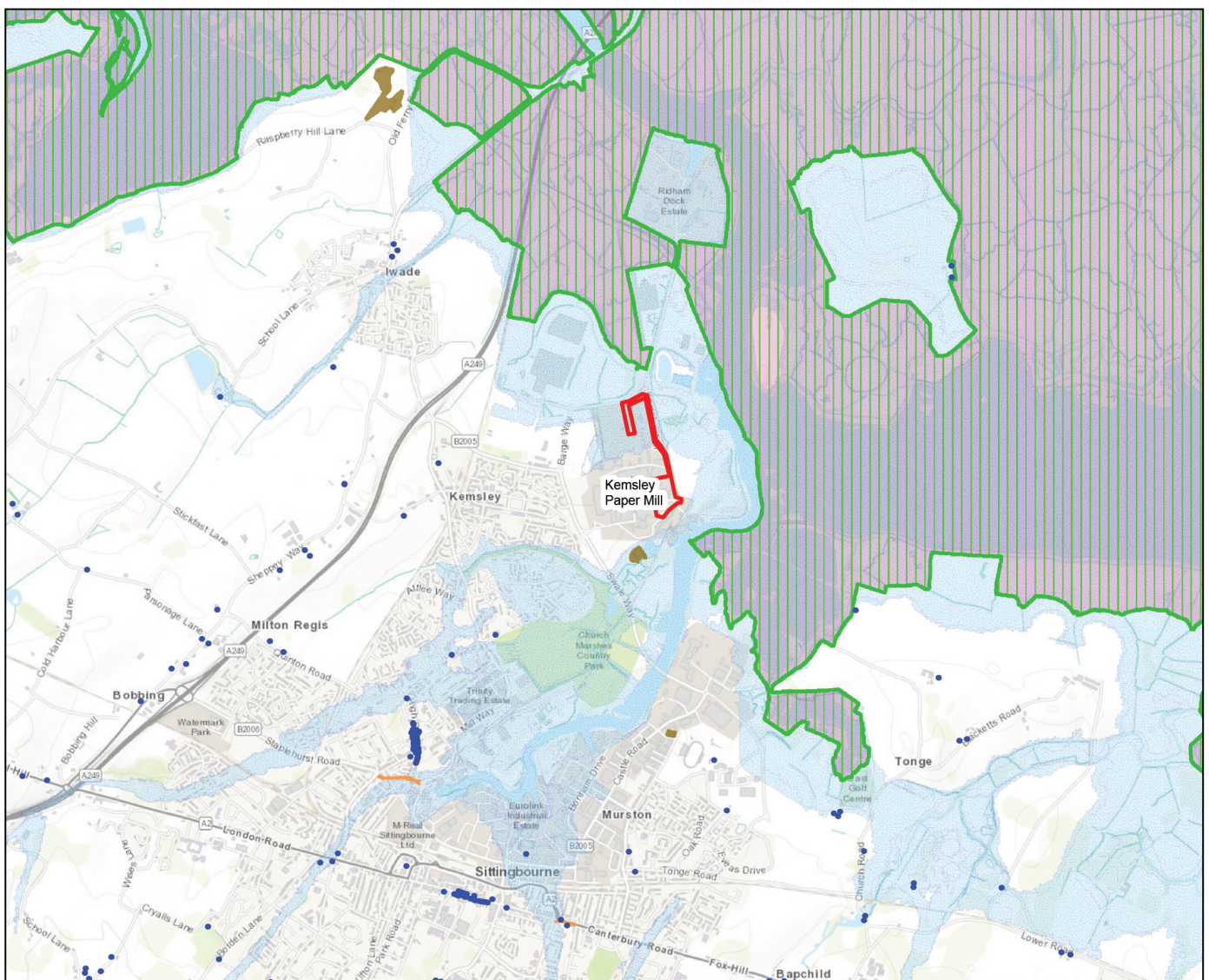










Figure 2: Sensitive sites/areas/receptors in proximity to the site.

- | | | | |
|---|---|---|--|
|  | Application Boundary |  | Site of Special Scientific Interest (SSSI) |
|  | Listed Buildings |  | Flood Zone 2 and 3 |
|  | Scheduled Monument |  | Built up area in proximity to site |
|  | Air Quality Management Area | | |
|  | Special Protection Areas and Ramsar Sites | | |

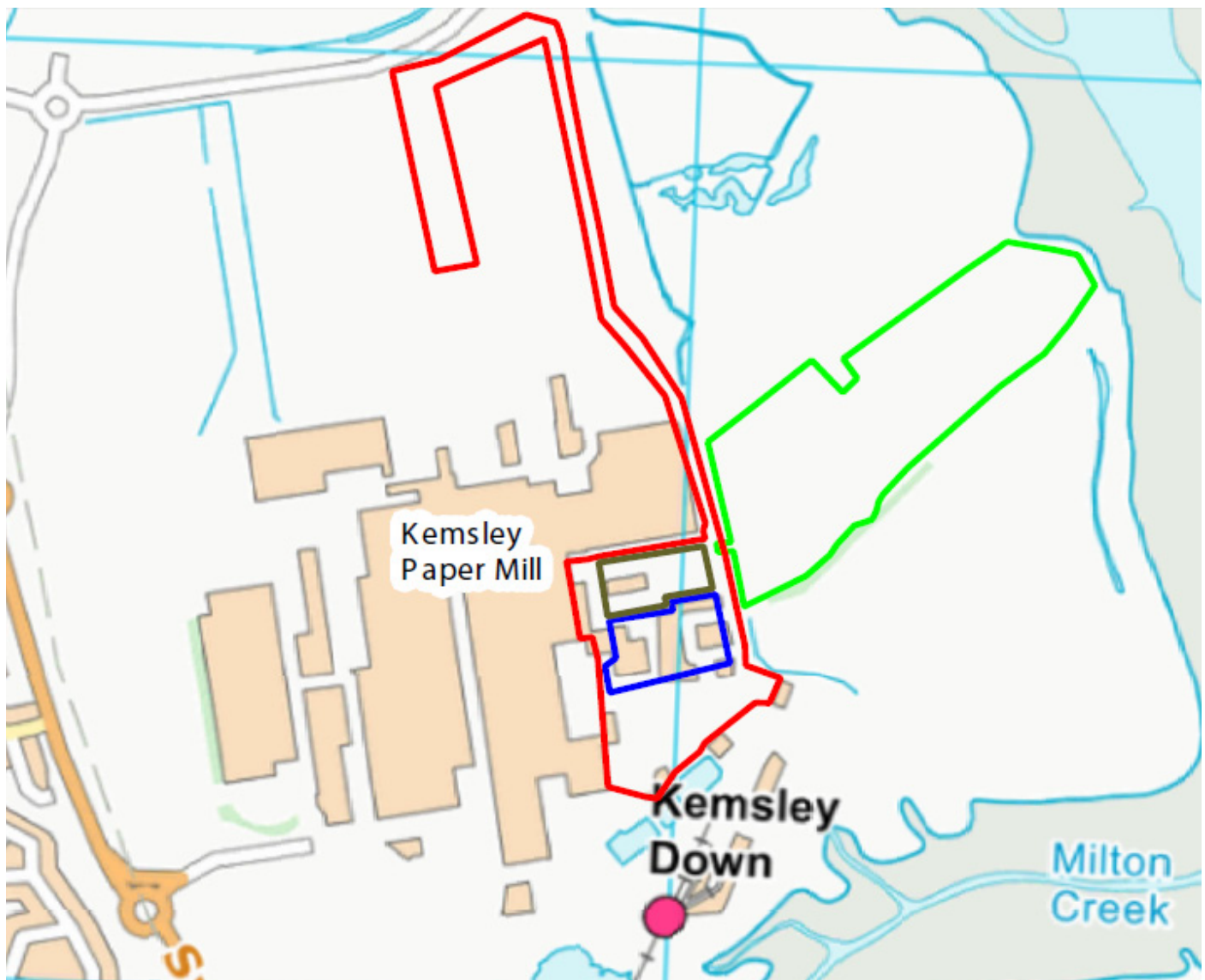
Existing Energy Sources at Kemsley

The paper production process is energy intensive and requires a substantial amount of electricity and steam. The energy and steam requirements of the Mill are provided by a range of sources, operated by either DS Smith or partner companies.

The current power sources are:

- K1 – a gas turbine CHP plant located within the mill site which provides electricity and steam to the mill;
- K2 – a steam generator located within the mill site which uses waste plastic and sludge as a source to provide steam to the mill;
- K3 – an energy from waste plant operated by Wheelabrator to the east of the main mill complex which from 2019 will provide steam to the mill.

K3 is currently being constructed, with the original design having a capacity of less than 50MW. A separate DCO application is being prepared, the 'Wheelabrator Kemsley Generating Station (K3) – Power Upgrade', to increase the capacity of the K3 plant to 75MW. That is an entirely separate proposal from the K4 scheme which forms the subject of this DCO application.



- Application Boundary
- Existing K1 Facility
- Existing K2 Facility
- K3 Permitted Wheelabrator Facility

Figure 3: Location of existing energy sources at Kemsley Paper Mill.

The Proposed Scheme

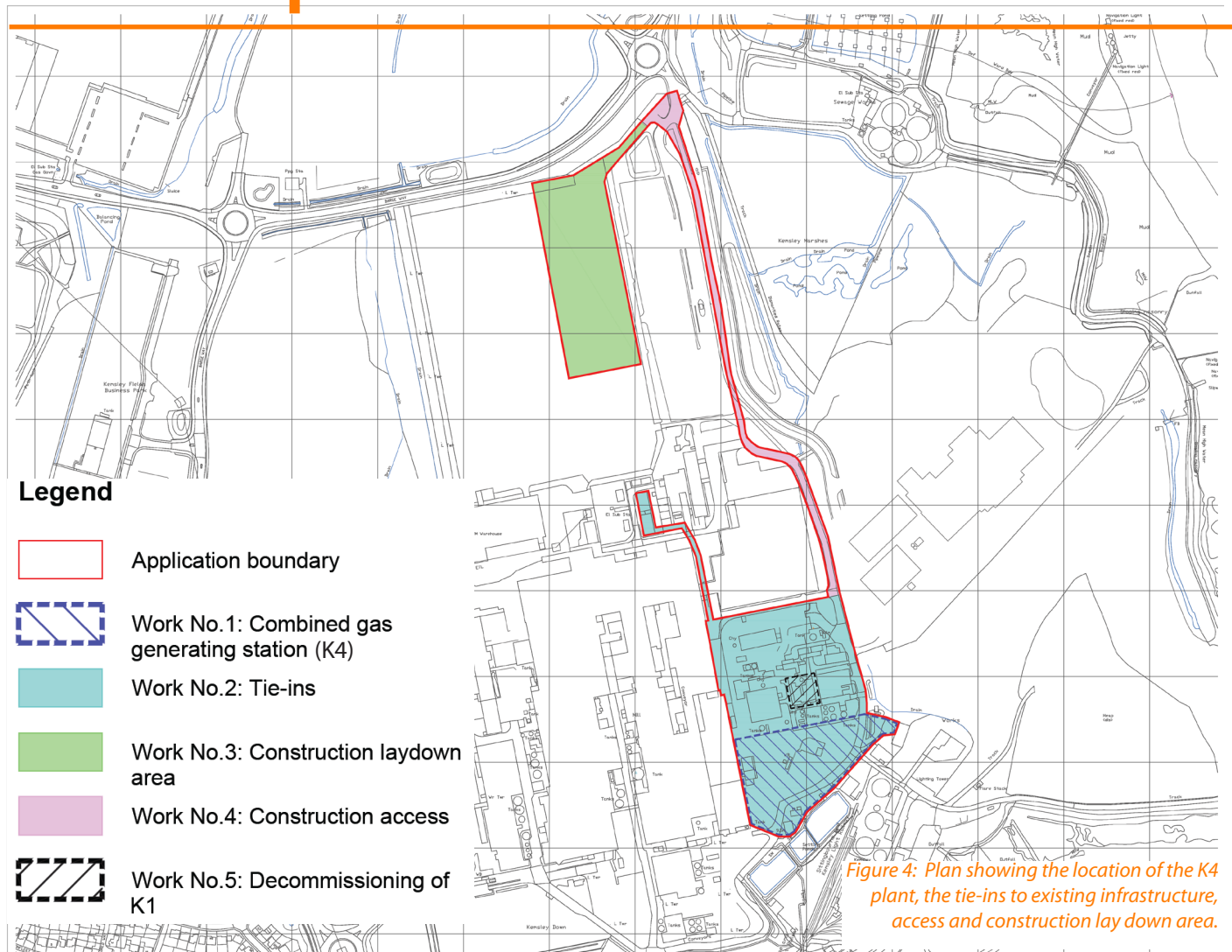


Figure 4: Plan showing the location of the K4 plant, the tie-ins to existing infrastructure, access and construction lay down area.

The electricity and steam provided by the existing K1 gas turbine is key to the operation of the Paper Mill. However K1 was built in 1995 and now requires significant investment to extend its operational life. In addition K1 was designed to also provide energy to the Sittingbourne Paper Mill in the centre of Sittingbourne (which no longer exists) as well as the Kemsley Mill, so has an inefficient surplus potential capacity.

DS Smith is therefore seeking consent to replace K1 with a new CHP plant, called K4. The new plant would be located on land within the existing Kemsley Paper Mill complex, adjacent to the existing K1 plant. It is intended to be a smaller, more efficient replacement of K1 of bespoke design to serve the specific needs of Kemsley Paper Mill and to complement the energy and steam provided by K2 and K3. A plan showing an illustrative layout of how K4 is likely to be constructed is provided in Figure 5 below.

K4 would be powered by natural gas. The detailed design of the CHP is still being finalised, but it will comprise the following:

- A gas turbine producing in the region of 52 to 57MW of electrical power;
- A Heat Recovery Steam Generator, producing in the region of 105 to 110 MWt of steam;
- A steam turbine, producing in the region of 16MW of electrical power.

K4 will be a combined heat and power plant (CHP) that works by burning gas to fire the gas turbine and create mechanical energy that produces electricity. This process generates excess heat which rather than wasted is then used to heat water and create high pressured steam which is fed through a second turbine to generate further electricity thereby maximising electricity generation (see Figure 6 below). The steam produced is also critical for the paper making process and is contained, de-pressurised and sent to the Paper Mill for use within the paper production process. It therefore provides an energy efficient way of providing both electricity and steam for the paper making process.

Once K4 is fully commissioned (expected in Summer 2021) K1 will be decommissioned and rendered inoperable before being dismantled at a later date with the exception of six ancillary package boilers from K1 which will be retained to provide back up steam in the event of a planned or unplanned temporary shutdown of either K2, K3 or K4.

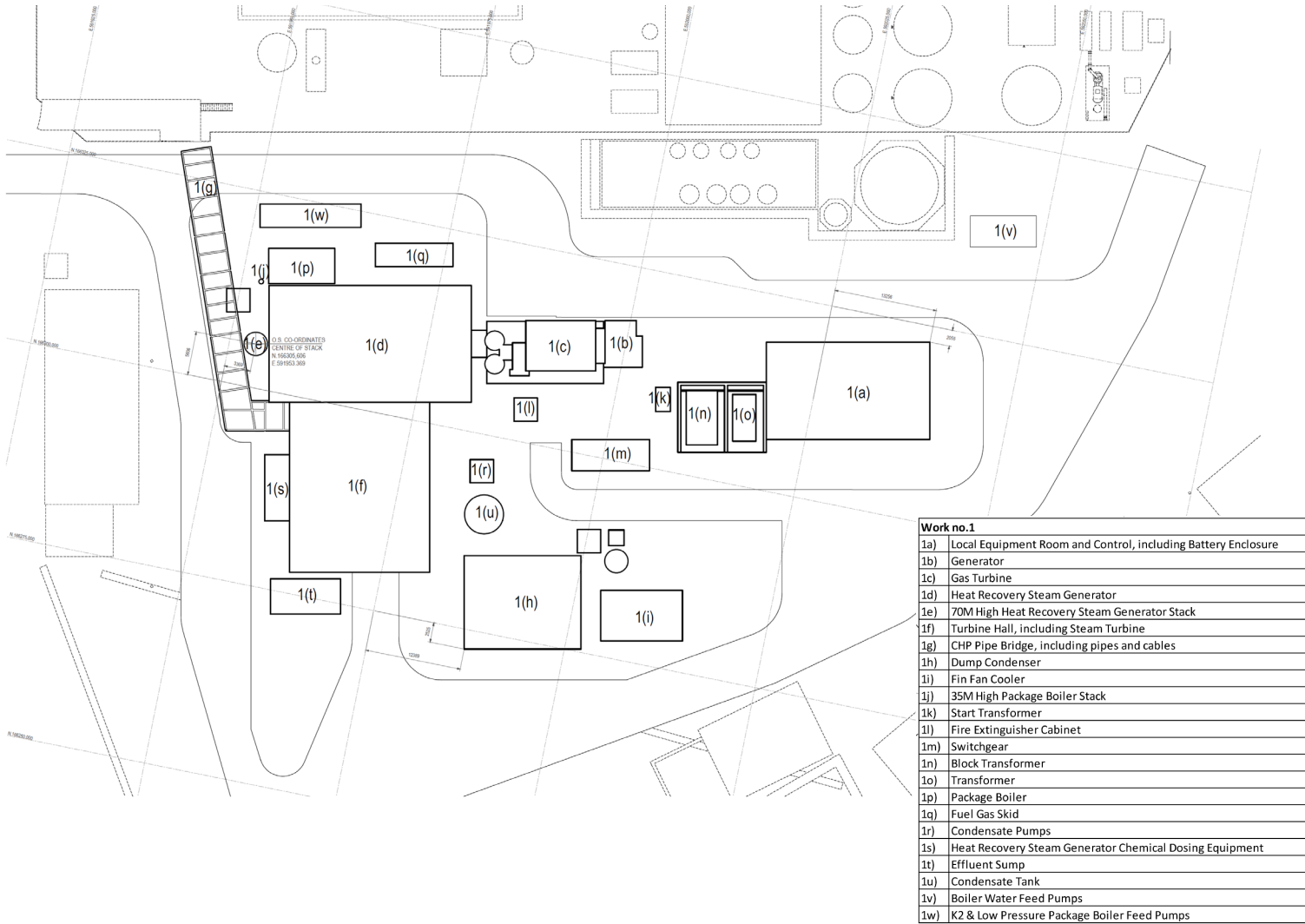


Figure 5: Illustrative plan showing how the Proposed Development is likely to be constructed.

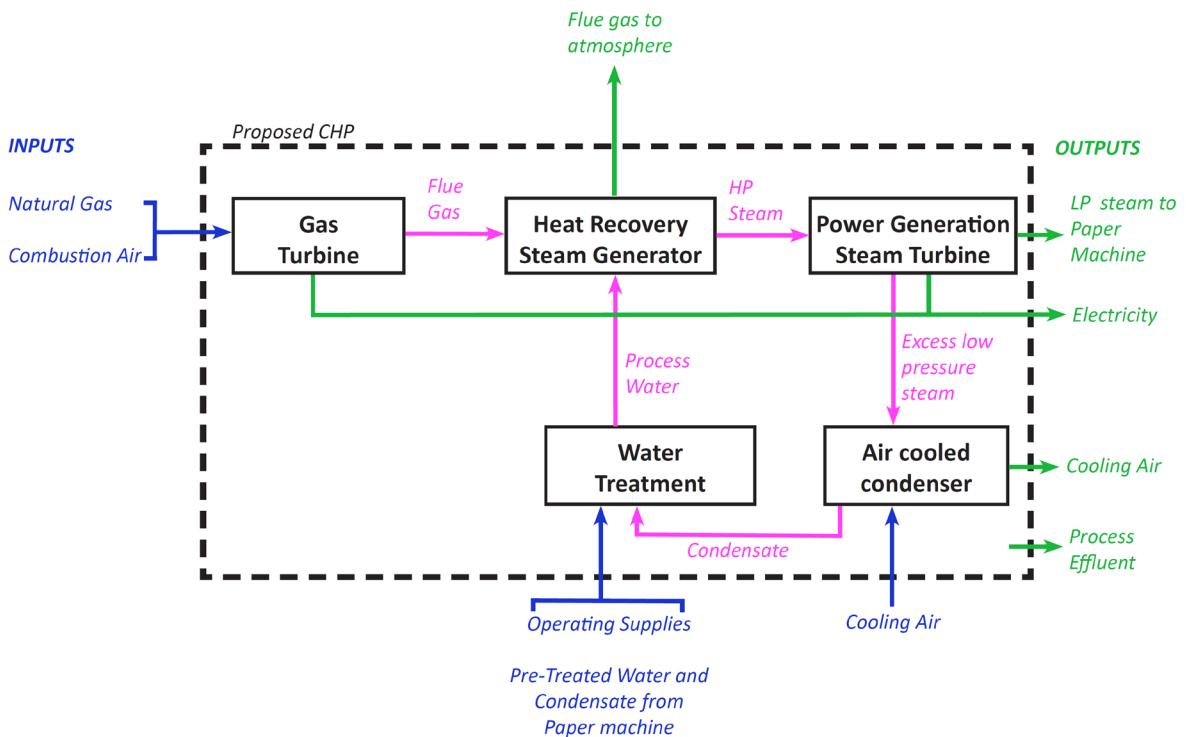


Figure 6: Infographic illustrating the key CHP processes of K4.

Impacts to be Assessed

The EIA has assessed a range of potentially significant environmental effects utilising the professional experience of a range of competent experts and the Scoping Opinion of the SoS and relevant consultees. The summary below provides a commentary on the assessments undertaken including the potentially significant environmental effects envisaged, any mitigation measures proposed to reduce or offset these effects and the likely residual effects of the development on the environment following mitigation where possible.

For further information on the results of the EIA please see the full ES submitted with the application (Document 3.1). Please see the end of this document for information on how you can submit formal comments on the ES.

What has been assessed?

A scoping checklist of environmental features and their components was utilised to identify those aspects of the environment or components of them that have the potential to be subjected to likely significant environmental effects and therefore should be included in the EIA during the scoping process.

A formal Scoping Opinion request, which included the results of the checklist assessment, was made to the SoS in July 2017 to agree the scope of the EIA in consultation with the relevant consultees i.e. KCC, the Environment Agency, Natural England etc.

The EIA has been produced in accordance with the SoS's formal Scoping Opinion and subsequent consultation undertaken during the completion of the EIA.

Method of assessment

The specialist assessments follow generally similar methodologies. Desk and/or field studies have been undertaken to establish the existing situation at the Site and surrounding area. The effects of the Proposed Development are then established using a method that compares the sensitivity /importance of an aspect of the environment with the likely size of the predicted change to establish the degree of effect (negligible, slight, moderate, substantial, very substantial). Typically if an effect is determined to be of moderate significance or above then it is deemed to be a significant effect for the purpose of the EIA Regulations.

The degree of an effect determines the resources that should be put in place to avoid or reduce an adverse effect. Where appropriate mitigation measures have been proposed to avoid/reduce a significant adverse effect. The significance of an effect with this mitigation in place is then re-assessed to determine its significance post mitigation.

Any significant environmental effects remaining after mitigation are reported and represent the likely residual effects of the proposed development on the environment.

All methodologies are undertaken in accordance with current guidance and best practice.

A summary of the assessments of the specialist environmental topics is provided below:

Air Quality

Impacts during the construction of the Proposed Development, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. The results of the risk assessment of construction dust impacts undertaken using the Institute of Air Quality Management's (IAQM) dust guidance, indicates that even before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance will reduce the residual dust effects to a level categorised as "not significant". The agreed mitigation measures would be included in a Construction Environmental Management Plan (CEMP) and the written approval of the documents required prior to construction.

The number of vehicle movements generated by construction activities is below the industry criteria for requiring an assessment. The effects due to emissions from construction-related vehicles can therefore be considered "not significant".

Emissions from the operation of K4 have been assessed using detailed dispersion modelling adopting best practice approaches. The assessment has been undertaken based on a number of conservative assumptions. These are likely to result in an over-estimate of the contributions that will arise in practice from the facility and is therefore considered robust. The results of the dispersion modelling reported in the ES indicate that predicted contributions and resultant environmental concentrations of all pollutants considered are 'negligible'.

The resulting air quality effect of the Proposed Development is therefore not significant.

Greenhouse Gases and Climate Change

The Proposed Development will replace an older, oversized and less efficient CHP plant (K1). Calculations of existing Greenhouse Gas Emissions (GHG) and those deriving from the Proposed Development have been undertaken. GHG emissions from K4 on a comparative basis over an assumed 25 year period will be approximately 12% less than K1 even if it were to be modified.

The Proposed Development is not therefore considered to have an adverse effect on GHG emissions and climate change.

Traffic and Transport

K4 will not generate any regular traffic when it is operational and the assessment has therefore considered the impact of K4 during the construction phase only. The peak construction period is expected at the start of the programme when groundworks and foundation works are ongoing, this would be during 2019.

During construction, it is estimated there will be an average of 100 staff on site with a peak of up to 200 staff on site during the early groundworks and foundation works period.

It is estimated that construction of K4 will generate an average of 25 to 30 HGV deliveries per day (average of 50 to 60 HGV movements per day) throughout the 20 month construction period. During the early groundworks and foundation works period, this could peak at up to 40 HGV deliveries per day (up to 80 HGV movements per day). This includes all associated construction activities including all deliveries (including abnormal indivisible loads) and all removal of material / waste etc.

Construction activities will be undertaken during normal construction working hours of 07:00 and 19:00 on weekdays and 07:00 to 16:00 on Saturdays and Sundays where needs dictate. A Construction Traffic Management Plan will be produced before the commencement of development to control construction vehicle routes and the timing of HGVs arrival and departure.

In accordance with current guidance, the construction traffic would result in a negligible impact along the adjacent highway network. Thus, it is predicted that the construction traffic would not result in any significant effects.

There would be less than four members of staff on site associated with K4 at any one time once operational and so any effect will be negligible. In terms of the future decommissioning of K4 it is predicted that vehicle movements will be lower than those required during construction and it is therefore reasonable to assume that this would not result in significant effects.

Noise and Vibration

The nearest residential properties are over 500m from the main construction area of K4. Given the separation between the K4 site and the nearest residential receptors, construction activities are unlikely to result in significant adverse effects due to noise.

Three of the more noisy phases of construction works have been considered: piling works; general excavation; and concrete works. Other construction activities, such as installing plant, would be expected to result in noise levels below that for those identified above.

An assessment using typical noise source levels taken from BS 5228-1:2009+A1:2014 for construction plant has been undertaken. This identifies that in accordance with industry standard noise criteria no significant effects on sensitive receptors (dwellings, schools, public rights of way) will occur.

Similarly construction vehicle movements are not of a magnitude to generate noise levels sufficient to result in significant noise related effects. There is no potential for significant vibration related effects from the construction of the Proposed Development. A Construction Environmental Management Plan will form a requirement of any DCO permission which will safeguard the implementation of standard and best practice noise management procedures during construction.

Using data on the various noise levels of the proposed plant no significant adverse effects on sensitive receptors during the normal operation of the Proposed Development are predicted to occur.

An emergency release valve is a safety feature of all CHP plant. K1 has an existing emergency release valve which has typically been used between 3-4 times per annum. K4 has been designed to include a dump condenser to deal with any excess steam production and to negate the use of the emergency release valve except in an absolute emergency. The safety release valve will therefore be required to be used less often in K4 than is required by the existing K1 facility by virtue of design.

No significant noise or vibration effects are therefore predicted to occur as a result of the Proposed Development.

Landscape and Visual Effects

The Site currently comprises concrete hardstanding and forms part of the operational land within the Kemsley Paper Mill site. Large scale industrial buildings, energy infrastructure and chimneys form the northern and western site boundaries and separate the location from the residential districts of Sittingbourne to the west. This urban area is defined as the Sittingbourne Industrial Commercial townscape character area. The Industrial/commercial character area has a poor quality and condition due to the extensive industrial buildings and infrastructure and the presence of disused and derelict land resulting in a low value.

There are no designated landscapes such as Areas of Outstanding Natural Beauty (AONB) which lie within proximity of the Site. The North Kent Marshes Special Landscape Area (SLA) extends over the Swale and neighbouring coastal landscape. This area includes the Chetney and Greenborough Marshes which lie next to the Site and extend along Milton Creek. This area is valued for the open character of its landscape.

The Site is currently not visible in views from the majority of the settlement of Sittingbourne due to industrial development on the edge of the town and the restored landfill mound to the east on the banks of the Swale. To the south-east of the Site the channel of the Swale and low-lying landscape of the Isle of Sheppey allow more open, longer distance views. Key visual receptors of high sensitivity and susceptibility to change in view as a result of the Proposed Development include walkers using the Saxon Shore Way long distance footpath beside the Swale and Milton Creek. People using this path form the closest high sensitivity receptors. The greatest number of visual receptors with views towards the Site would be occupiers of vehicles travelling on Swale Way.

The new buildings and infrastructure which form the proposed K4 CHP, although large in scale, would form an extension of the existing character of neighbouring development at Kemsley Paper Mill. The townscape character of the Site would be of low sensitivity to change through redevelopment. There would be no significant adverse effects on townscape character during construction or operation during the day or at night.

The surrounding rural landscape character areas of the Swale and Isle of Sheppey are generally in good condition

and have an intrinsically high value. There would be no direct effects on these rural and wild landscapes and their sensitivity to change through the indirect influence of the new CHP would be medium or low. There would be no significant adverse effects on landscape character during construction or operation during the day or at night.

Walkers using the Saxon Shore Way would experience a sequence of views that would include a more heavily developed cluster of energy infrastructure at Kemsley Paper Mill within a journey between Milton Creek and Ridham Docks. Whilst the assessment of individual viewpoints concludes that there would be no significant effects on receptors at each individual location, when the series of views are combined into a single journey, walkers would experience a significant adverse sequential effect on visual amenity, in the long term. There would be no significant adverse effects on other visual receptors within the study area during construction or operation during the day or at night.

Cultural Heritage

The direct and indirect effects of the Proposed Development on the historic environment of the area, including buried archaeological sites, historic buildings and historic landscapes have been assessed. The assessment identifies all effects on these heritage assets - in terms of the potential for direct physical disturbance and indirect visual effects on setting - and to assess the overall effect and significance of these predicted effects. The likely impacts are assessed during the construction, operational and decommissioning phases of the Proposed Development.

The Site lies within a wider landscape which generally has high potential to contain remains of all periods from the prehistoric onwards. Site visits, however, have indicated that the Site contains buildings and existing concrete hardstanding. Both the nature of the 20th century land-use at the site and the associated ground disturbance suggests that the potential for the survival of previously unidentified sub-surface archaeological remains of national importance, or of sufficient importance to warrant preservation in its existing location is unlikely. In addition it is likely that any archaeological remains that may have been on Site will have been damaged or removed and that the potential for the survival of significant archaeological remains is low. Any buried remains are likely to be of at most low significance. The effect of the Proposed Development on any surviving buried remains would therefore be minor adverse and not significant.

There are no designated assets (e.g. scheduled monuments, listed buildings) within the Site. The nearest designated asset is Castle Rough, a scheduled monument. The scheduled monument is located some 230 m southwest of the Site. The scheduled monument is of highest significance. However, there would be no physical impact upon the scheduled monument from the Proposed Development and any impact would be on the setting of the designated asset. Given the location and scale of the existing Paper Mill buildings, the impact magnitude on the setting of the scheduled monument is assessed as being negligible. The effect of the Proposed Development on the scheduled monument would be minor adverse, and this would be an indirect effect that is not significant. The effect would be long term. There would be no significant effects on any other designated assets.

Biodiversity

The Site consists almost entirely of existing concrete hard standing and does not have the potential to support protected species.

Notwithstanding this the Site lies in close proximity to a number of environmentally sensitive sites with respect to their biodiversity interest. The Site lies within 300m of the Swale Estuary Special Protection Area (SPA) and Ramsar site legally protected for the breeding and wintering bird communities it supports. The Site also lies adjacent to the Milton Creek Local Wildlife Site and there are a number of other wildlife sites of national and international importance within a 10km area around the Site.

The potentially significant adverse effects of the development therefore relate to water quality, noise, light spill and air quality. The emissions and potential impact of the development has been assessed using established environmental assessment criteria and the results of supporting studies (air quality, noise and water environment).

No significant effects on the designated sites were identified as likely to occur as a result of the Proposed Development and therefore no significant adverse effects have been identified on their biodiversity interest and the animal species and plants they support.

Ground Conditions

The baseline ground conditions in the vicinity of the Site have been considered. This involved reviewing the history, geology, hydrogeology and hydrology of the Site as well as available ground investigation results from investigations undertaken in the vicinity of the Site.

A conceptual model has been developed that identifies potential contamination sources, sensitive receptors and contamination exposure pathways.

Based upon the available data, it is anticipated that during the construction phase there would be potential minor adverse effects to human health from (construction workers, adjacent site users and from the presence of ground gas), shallow groundwater, deep groundwater, the Swale river and ecological receptors from potential ground contamination that may exist and in the absence of mitigation.

Upon completion of the development, it is anticipated that there would be potential moderate significant adverse effects to human health from the presence of ground gas associated with a nearby landfill without mitigation.

The report stipulates that a number of mitigation measures are implemented during construction to mitigate effects to human health and controlled waters. These measures are in line with industry best practice and include the appropriate segregation, storage and disposal of waste, the appropriate storage of hazardous materials during construction, undertaking a piling risk assessment to identify the most appropriate piling techniques to prevent the downward migration of contamination into aquifer and the implementation of suitable measures in line with regulatory requirements to manage ground gas exposure risks to humans. This includes specified standard practice ground gas protection measures in the developments design. Once ground gas measures have been implemented in new structures, no significant adverse effect is anticipated to be present to human health.

Subject to the implementation of the identified mitigation measures no significant residual adverse environmental effects are envisaged to result from the Proposed Development during construction or when operational.

Water Environment

The location of K4 plant lies in flood zone 1 an area categorised as having a low risk of tidal or river flooding. Future climate change scenarios produced by the Environment Agency (EA) confirm that this will remain the case for the duration of the operational life of K4. Whilst areas of the DCO boundary such as the laydown area lie in flood zones 2 and 3 (at moderate to high risk of flooding) no permanent development is to be situated in these locations. Standard flood risk prevention measures will be employed during the construction stage to mitigate any temporary flooding risk associated with the construction laydown area.

The Site consists almost entirely of existing impermeable concrete hard standing. The Proposed Development will not increase the impermeable area beyond existing baseline conditions on the Site and therefore will not increase surface water flood risk on or off the Site. Surface water will be dealt with in accordance with the existing surface water drainage infrastructure of the Mill and discharged using the same surface water outfall.

In terms of process water from the CHP process any excess water will be conveyed to the Mill's existing Waste Water Treatment Facilities (WWTF). As a smaller more efficient plant there will be less excess water by way of volume compared to K1. The Mill's WWTF is controlled by an EA permit which seeks to control water quality and temperature to acceptable limits. The Proposed Development will therefore be required to meet the existing permit limits and no effect on water quality or temperature at its point of discharge into the Swale will occur.

Process water for K4 will use ground water abstracted by DS Smith in accordance with their EA permit as currently occurs for K1. This permit sets a maximum abstraction limit for the Mill. As a smaller more efficient plant K4 will use less water than K1 and therefore there will be no effect on the existing permitted ground water abstraction limit in place and no effect of ground water resources.

Cumulative Effects

Schedule 4 of the EIA Regulations states that an ES should provide a description of the likely significant cumulative effects of the development with other existing and/or approved projects.

The ES for the Proposed Development has therefore considered the potential cumulative effects of the Proposed Development in combination with other developments within the local area. Cumulative effects can occur where more than one individual impact may lead to a more significant effect when considered in combination.

The following developments listed below and shown on Figure 7 have been considered in combination with the Proposed Development with regard to significant cumulative effects and agreed with PINS and statutory consultees:

1. 16/501484/COUNTY - The construction and operation of a gypsum recycling building
2. 16/501228/FULL - Construction of new baling plant building
3. 16/507687 - The construction and operation of an Incinerator Bottom Ash (IBA) recycling facility
4. SW/10/444 - Development of a sustainable energy plant
5. END10085 - DCO scoping opinion for power upgrade project
6. 15/510/589/OUT - Construction of Business Park
7. SW/11/1291 - Anaerobic digester and associated ground profiling and landscaping
8. 14/500327/OUT - Up to 8000m² of class B1 and B2 floor space and country park
9. SW/12/0816 - Relocation of Nicholls Transport depot from Lydbrook Close
10. 16/506935/COUNTY - Application for steam pipeline connecting the Ridham Dock Biomass Facility to the DS Smith Paper Mill
11. SW/14/0224 - Application for solar farm
12. 14/502737/EIA - Scoping opinion for combined heat and power plant.
13. SW/12/1211 - Construction of materials recycling facilities and waste transfer station
14. 15/500348/COUNTY - Install advance thermal conversion and energy facility at Kemsley Fields Business Park
15. 17/503713/ENVSCR - EIA Screening Opinion for large residential development
16. 16/506193/ENVSCR - EIA Screening Opinion - Outline application for proposed residential development of 275 dwellings
17. 16/506014 - EIA Scoping Opinion - A sustainable urban extension comprising up to 1,100 new dwellings
18. 17/505073/FULL - Erection of a tile factory including service yard, storage yard and parking area
19. 18/500393/FULL - Erection of a natural gas fuelled reserve power plant with a maximum export capacity of up to 12MW
20. Forthcoming application by D S. Smith for a new southern boundary road for Kemsley Paper Mill
21. 18/500257 - Proposed Development of 153 Dwellings

Following the implementation of the mitigation measures set out by the relevant technical specialists the development is only considered to result in a significant adverse cumulative effect on landscape character and views from the Saxon Shore Way. Details of the full suite of mitigation measures proposed are set out in the main ES (Document 3.1).

The Proposed Development in combination with the other cumulative developments identified would result in a significant adverse effect on the landscape character of the area and sequential views along the Saxon Shore Way public right of way. This is an inevitable effect of the quantum of development permitted or proposed in this locality, reflective of its industrial context. However, K4 in its own right is considered to make a negligible contribution to the cumulative effect on landscape character which would occur even in the absence of K4. Further details of this assessment are available in Chapter 11 of the main ES (Document 3.1).

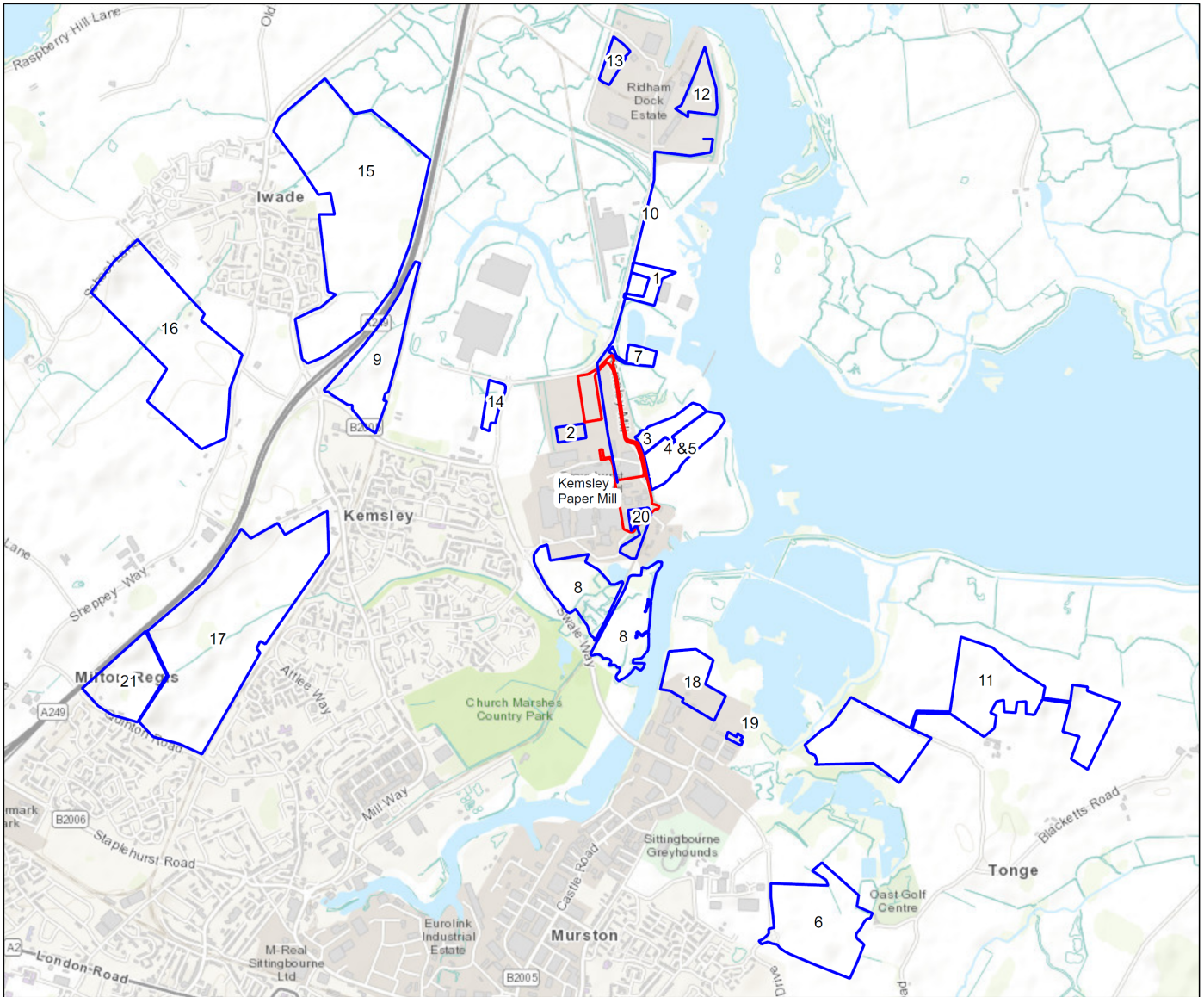


Figure 7: sites included in the assessment of cumulative effects with the Proposed Development.

- | ID | Name |
|-----|--|
| 1. | 16/501484/COUNTY - The construction and operation of a gypsum recycling building |
| 2. | 16/501228/FULL - Construction of new baling plant building |
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| 18. | 17/505073/FULL - Erection of a tile factory including service yard, storage yard and parking area |
| 19. | 18/500393/FULL - Erection of a natural gas fuelled reserve power plant with a maximum export capacity of up to 12MW |
| 20. | Forthcoming application by D S. Smith for a new southern boundary road for Kemsley Paper Mill |
| 21. | 18/500257 - Proposed Development of 153 Dwellings |



Figure 8: 3D visualisation of how it is intended K4 would look in the context of the existing Paper Mill site.

Summary

The Proposed Development, subject to the implementation of the full suite of mitigation measures set out by the respective topic specialists, will result in a number of slight residual adverse effects on the environment which inevitably result from a development of this size, albeit are not considered significant.

However, walkers using the Saxon Shore Way would experience a sequence of views that would include a more heavily developed cluster of energy infrastructure at Kemsley Paper Mill within a journey between Milton Creek and Ridham Docks. Whilst the assessment of individual viewpoints concludes that there would be no significant effects on receptors at each individual location, when the series of views are combined into a single journey, walkers would experience a significant sequential adverse effect on visual amenity, in the long term. When considered in combination with other planned or permitted development in the locality a significant adverse cumulative effect on the landscape character of the area and sequential views along the Saxon Shore Way public right of way is predicted. Notwithstanding this K4 in its own right is considered to make a negligible contribution to the cumulative effect on the landscape character of the area that would occur even in the absence of K4.

The Proposed Development is not considered to result in any other significant cumulative adverse effects on the environment when considered in combination with other local developments within the zone of the influence of the development or the Paper Mill.

Further detailed information on the environmental assessment of the Proposed Development is provided within the main ES and its technical appendices.

When will the scheme be built?

At this stage it is not possible to accurately estimate when the development will become fully operational which is intrinsically linked to the main contractor appointed, build out rates, the DCO process and discharging of any requirements attached to the consent. However, it is estimated that a formal decision by the SoS will be made by Spring 2019. In this instance construction would begin by the summer of 2019 and take approximately two years to complete. K4 would therefore be fully commissioned and operational by the end of 2021.

Further Information

Electronic copies of the ES, NTS and other planning application documents can be viewed and downloaded free of charge on the PINS and DS Smith websites:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/kemsley-paper-mill-k4-chp-plant/>

<http://www.dssmith.com/paper/about/paper-mills/kemsley-uk/k4-projectpublic-consultation>

Copies of the ES and NTS can also be inspected at the following locations until the conclusion of the examination period (anticipated February 2019), with typical opening hours shown:

- | | |
|---|--|
| - The Site Office, DS Smith Kemsley Paper Mill, ME10 2TD - | 9am to 5pm Monday to Friday |
| - Swale Borough Council Offices, East Street, Sittingbourne, ME10 3HT | 8:45am to 5pm Monday to Thursday,
8:45am to 4:30pm Friday |

Additional copies of the ES (paper or CD) may be obtained at a reasonable charge to reflect printing and distribution costs by contacting:

DHA Environment
Eclipse House
Eclipse Park
Sittingbourne Road
Maidstone
ME14 3EN
Tel: 01622 776226
Email: info@dhaplanning.co.uk

Making Representations On The ES And DCO Application

Following submission the Planning Inspectorate has up to a month to assess whether the DCO application is valid. The applicant is required to publicise the acceptance of a DCO application, at which point details will be provided as to how to register with PINS to be an Interested Party during the DCO examination. At that stage there is the opportunity to make an initial representation regarding the content of the DCO application. All such Relevant Representations made will be published by PINS on their website.

Anyone registered as an Interested Party will then be updated by PINS as the examination of the application progresses. They will have the opportunity to attend and speak at the Preliminary Meeting, which considers how the examination will proceed, and then at any Hearings which take place during the examination period itself. In addition, Interested Parties can submit a detailed Written Representation and make submissions in response to the formal questions raised by the Inspector(s) and the submissions of the Applicant and other Interested Parties.