



**Document 3.1- ES Volume 2
Appendix 5.1 Air Quality Consultation**

**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

Appendix 5.1: Consultation

The scope and methodology for the air quality assessment, as set out in this chapter, was agreed with the Environmental Protection Team Leader at Mid Kent Environmental Health as shown in the email chain below.

Fiona,

Apologies for the delay in responding.

I have now had an opportunity to look through your proposed scope and methodology and have no issues with it, please proceed.

Presumably I will be able to comment on the assessment once it has been completed?

Regards

Steve Wilcock

Environmental Protection Team Leader

Mid Kent Environmental Health

Maidstone Borough Council, Maidstone House, King Street, Maidstone ME15 6JQ

Swale Borough Council, Swale House, East Street, Sittingbourne, Kent ME10 3HT

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From: Fiona Prismall [<mailto:PrismallF@rpsgroup.com>]

Sent: 06 November 2017 15:21

To: Steve Wilcock; Environmental Health Admin Team (SBC & MBC)

Cc: 'Tim Spicer (tim.spicer@dhaplanning.co.uk)'

Subject: RE: Kemsley K4 - Air Quality Assessment

Dear Steve

I wrote to you last month in relation to an assessment at the Kemsley Paper Mill. Please could you come back to me if you have any issues with our proposal as we will be commencing the modelling in the near future.

Regards

Fiona

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From: Fiona Prisma

Sent: 17 October 2017 11:23

To: steve.wilcock@midkent.gov.uk; ehadminSBC-MBC@midkent.gov.uk

Cc: Tim Spicer (tim.spicer@dhaplanning.co.uk)

Subject: Kemsley K4 - Air Quality Assessment

Dear Steve

RPS has been asked to undertake an air quality assessment for the replacement of an existing gas-fired Combined Heat and Power (CHP) plant with a new gas-fired CHP plant to supply steam and power to Kemsley Paper Mill, in Sittingbourne Kent. The proposed development seeks to decommission the existing K1 CHP on the Site and build, commission and operate a new 54-57 MW CHP plant (known as K4). K1 will be decommissioned once the new CHP plant becomes fully operational and reflected in the amended Environmental Permit issued by the Environment Agency which controls the operation of the site. This permit variation application will be submitted alongside the DCO application and in place prior to any Order granting Development Consent.

I have attached a figure indicating the site location. In accordance with National Planning Practice Guidance, the purpose of my email is to agree the scope of the assessment and the method with you:

- For the construction phase, we propose to undertake an assessment of risk of nuisance dust effects using the Institute of Air Quality Management (IAQM) *Guidance on the assessment of dust from demolition and construction*.
- Generic mitigation measures designed to control dust nuisance effects and emissions during construction, consistent with the level of risk, will be recommended. These will be drawn from the IAQM 'Guidance on the assessment of dust from demolition and construction'.
- The effects of emissions from K4 (nitrogen oxides and carbon monoxide) will be evaluated using the ADMS 5 dispersion model. The dispersion modelling will take account of terrain, local building and meteorology effects. We will use five years of hourly sequential meteorological data collated at Gravesend.
- We will determine the stack height for K4 to establish the minimum height at which local buildings are not predicted to affect dispersion:
 - Annual-mean NO₂ and maximum daily running 8-hour mean CO concentrations will be modelled for a grid of receptors centred on the combustion plant and selected sensitive human-health receptors.
 - Concentrations of nitrogen oxides, nutrient nitrogen deposition and acid deposition rates will be modelled for a grid of receptors at the Swale Special Protection Area

(SPA), Medway Estuary and Marshes SPA, Thames Estuary and Marshes SPA; and Queendown Warren Special Area of Conservation (SAC).

- The effects of cumulative emissions from K4 will be evaluated by including K2 and K3 nitrogen oxides emissions within a single model. Consideration will be given to the likely cumulative effects while K1 is being decommissioned.
- Cumulative air quality effects arising from the project alongside other projects within the area from other industries/activities (e.g., industrial/commercial development, coastal infrastructure) would be included in the assessment.
- The significance of the illustrated effects of the combustion of the gas will be described using professional judgement and relevant criteria, including those set out in the Environmental Protection UK (EPUK)/IAQM (January 2017) Land-Use Planning & Development Control: Planning For Air Quality document.
- Mitigation measures to improve air quality during the operational phase will be recommended, should initial results of the assessment show any adverse air quality effects arising from the proposed development.

Please could you advise if you consider our proposed scope and methodology appropriate. If you need any further information to comment, then please let me know.

Regards

Fiona

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