



Mr. Kevin Gleeson
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**Environment, Planning and
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BY EMAIL ONLY

30 July 2018

Dear Mr. Gleeson,

Re: Application by DS Smith Paper Ltd for an Order Granting Development Consent for The Kemsley Mill K4 Combined Heat and Power Generating Station – Written Representation Submission

Following the Planning Inspectorate's Rule 8 letter dated 24 July 2018, Kent County Council (KCC) submits its Written Representation. KCC wishes to be considered as an Interested Party for this application.

KCC has set out its position in relation to the proposed development in its Relevant Representation letter dated 8 June 2018 and is engaging with the agent representing the applicant (DHA Planning) on the matters raised. A general update on the principal submissions outlined in KCC's Relevant Representation is provided below. The letter has been prepared in accordance with Planning Inspectorate Advice Note 8.4.

In summary, the principal issues that KCC has made in relation to the application concern:

- Highways and transportation, as the Local Highway Authority for Kent;
- Minerals and waste, as the Minerals and Waste Planning Authority for Kent;
- Heritage and Conservation; and
- Surface Water Flooding and Drainage.

Highways and Transportation

As set out within KCC's Relevant Representation letter dated 8 June 2018, the final Transport Assessment should provide justification for the predicted number of HGV movements. It will also need to provide a clear indication as to the length of time that

the peak number of staff would be expected to be on site. In addition, the number of remaining staff expected for the construction period should be made clear in order for any impact and parking need to be assessed. KCC is awaiting clarity from the applicant on this matter.

KCC would also like to clarify that within KCC's Relevant Representation, the comments regarding the Construction Traffic Management Plan measures relate to those listed in paragraph 4.8.2 of the Traffic and Transport section of the Environmental Statement Volume 1 – April 2018, and not of the Outline Construction Environmental Management Plan.

Minerals and Waste

As demonstrated within KCC's Relevant Representation dated 8 June 2018, KCC, as the Minerals and Waste Planning Authority, remains of the view that the proposed development is not affecting any Mineral Safeguarding Areas and would not have any implications on existing waste management capacities. Therefore, KCC as Minerals and Waste Planning Authority for Kent has no further comments to make in relation to minerals and waste safeguarding implications.

Heritage and Conservation

As set out within KCC's Relevant Representation letter dated 8 June 2018, KCC considers that mitigation of the potential archaeological impacts of the scheme should include a requirement that seeks further assessment of the impacts of the scheme on buried archaeology.

KCC recommends that this should be done initially through a review of any forthcoming geotechnical data from the site and then an informed and targeted programme of evaluation through trial trenching and possibly bore hole survey.

Should potential archaeological impacts be subsequently confirmed as a result of the evaluation, provision should be made for further investigation and reporting. At present, the draft Requirement 13 'Archaeology' limits the works to a watching brief only, which KCC does not consider acceptable.

KCC is working with the applicant to ensure suitable wording of Requirement 13 which will allow for a programme of archaeological evaluation to assess the impact of the scheme on the buried archaeology.

Surface Water Flooding and Drainage.

KCC, as Lead Local Flood Authority, is satisfied with the mitigation measures as proposed within Table 9-11 of the Environmental Statement.

KCC welcomes the proposal from the applicant for Requirement 11 to include appropriate wording regarding the relevant consenting authority.

KCC looks forward to working with the applicant and Planning Inspectorate as the project progresses through the Examination process and will welcome the opportunity to comment on matters of detail further as may be required throughout the Examination.

Should you require any additional information or clarification, please do not hesitate to contact me.

Yours sincerely,



Katie Stewart

Director - Environment, Planning and Enforcement