

Mr. E. Williams  
National Infrastructure planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Our Ref: 18/501923/ADJ  
PINS ref: EN010090  
Date: 14 August 2018

Dear Mr Williams,

**Local Impact Report in respect of the application by DS Smith for an Order Granting Development Consent for the Kemsley Paper Mill (K4 CHP Plant);**

I submit the following as the Council's Local Impact Report in respect of the above development.

Site Location

1. The development is proposed to sit within the confines of the existing Kemsley Mill site, which lies to the north of Sittingbourne and within the defined built up area boundary. It is a prominent and recognisable feature of the town's landscape, and visible from numerous locations on both the mainland and the Isle of Sheppey.
2. The Swale (a coastal SSSI and SPA designated for its biodiversity value, particularly for migratory birds) lies to the east/southeast of the site beyond areas of open ground, and public footpath ZU1 (the Saxon Shore Way) approximately follows the coastline past the mill. To the south of the mill is Castle Rough, a scheduled monument (HER Number: TQ 96 NW 10) comprising a Danish fortress / medieval moated manor house that is now largely subsumed by the landscape and apparent only through changing land levels.
3. To the west of the site is an agricultural field, beyond which lies Swale Way (a main arterial road through Sittingbourne). On the far side of Swale Way are residential dwellings. Sittingbourne's main industrial area, Ridham Dock, lies to the north of the site and comprises a number of heavy industrial activities. There is also a large supermarket depot and a number of light industrial buildings to the northwest, which comprise the first phases under an outline consent for development of all the (currently) vacant land to the north (ref: SW/95/0099).
4. The mill is accessed by Swale Way, which runs westwards to the Grovehurst Road (a busy B road leading to the town centre) and the A249 (and M2 beyond), and southwards through the Eurolink industrial estate to the town centre and A2 (London to Dover road).

Neighbouring Development

5. Outline planning permission has been granted (ref: 14/500327/OUT) for

redevelopment of land to the south of the mill for up to 8000sqm of B1 and B8 uses. Preliminary off-site compensatory works required by that permission have recently been completed, and a reserved matters application is expected in the near future.

6. Planning permission was granted by Kent County Council (SBC ref. SW/10/0040) for the erection of a CHP plant on land to the east of the mill. Known as K3, the structure is currently under construction and completion is expected mid-2019. A further DCO for amendments to that project is the subject of preliminary discussions between Wheelabrator technologies and PINS (ref. no. unknown).

### Swale Borough Local Plan 2017

7. The adopted Local Plan is the Swale Borough Local Plan 2017, which was adopted last year after a formal review and adoption process. The following policies (all available for view online: <http://services.swale.gov.uk/media/files/localplan/adoptedlocalplanfinalwebversion.pdf>) are considered to be relevant to this proposal:

ST1 (sustainable development), ST5 (Sittingbourne area strategy), CP1 (strong, competitive economy), CP4 (good design), DM14 (general development criteria), DM28 (biodiversity and geological conservation), and DM34 (Scheduled Monuments and archaeological sites).

### Kent County Council Adopted Policies

8. The following policies and documents are relevant:
  - [Kent Minerals and Waste Local Plan 2013-30](#);
  - [Kent Environment Strategy](#) (March 2016). This strategy has three themes: Building the foundations for delivery, Making best use of existing resources, avoiding or minimising negative impacts and Toward a sustainable future;
  - [Kent and Medway Growth and Infrastructure Framework](#) provides a picture of emerging development and infrastructure requirements, to support growth across Kent and Medway, up to 2031;
  - [Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031](#); and
  - [Kent Waste Disposal Strategy](#).

### Residential Amenity

9. The application site lies within the confines of the existing mill complex and within an area generally set aside for industrial uses. It is not anticipated that this development would give rise to any significant amenity concerns for local residents (closest property ~185m from the nearest mill building) over an above those associated with the regular operation of the mill, and the existing surrounding land uses.

### Landscape / Visual

10. A public right of way (ZU1, the Saxon Shore Way) runs roughly north-south along the coast to the east of the site, and affords views of the wider mill complex. There are also long distance views of the mill from numerous locations both on the mainland and on the Isle of Sheppey. However the proposed development will be viewed against

the context of the existing mill, which includes large industrial-style buildings, outbuildings, vehicle parking areas, and tall chimneys. Therefore it is not expected that the proposed development would be prominent, or give rise to any significant visual impacts or additional significant harm to the wider landscape over and above that arising from the existing circumstances.

### Highways

11. No significant impacts over an above those associated with the current operation of the mill are anticipated, and in that regard the Council does not have any serious concerns in respect of highway safety and amenity, The Council would, however, respectfully defer final comment on this matter to Kent Highways & Transportation and the Highways Agency (as necessary).

### Ecology

12. As noted above: the site lies adjacent to the Swale SSSI / SPA. The development has the potential to impact these protected areas by way of noise and emissions. It is noted, however, that the K4 CHP will replace an existing plant, K1. In that regard the Council has no serious concerns, but, as with highways, would defer final comment on this matter to the relevant statutory authorities (Natural England and Kent County Council ecology).

### Scheduled Monuments / Archaeology

13. As noted above the mill lies near to Castle Rough, a Scheduled Monument. However given the location of the proposed development SBC does not have any significant concerns in regards the impact on its special character or setting. SBC would, however, defer final comment on this matter to Historic England and the Kent County Council archaeologist.

### The Draft DCO

14. The Council has considered the draft DCO, and has no significant concerns in respect of its contents at this time. Minor amendments were suggested at the initial hearing in respect of wording within Schedule 1 that would allow "alteration of any building," but this has since been addressed by the applicant and the Council has no further comments.

Please let me know if you have any questions.

Yours sincerely,



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