

Date: 19 November 2018  
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**BY EMAIL ONLY**

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Dear Sir

**NSIP Reference Name / Code: Kemsley Paper Mill (K4) CHP Plant (EN010090)  
The Examining Authority's Second Written Questions and Requests for Information (ExQ2)**

Thank you for your consultation on the above, and for allowing additional time for Natural England to respond.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Answers to the Examining Authority's second written questions**

- Q2.1.4 Natural England has no comment to make regarding the impact of stack height on matters other than ecology.
- Q2.1.5 Natural England's view is that the Register of Environmental Actions and Commitments (REAC) provided as an appendix to the outline CEMP [REP3-009] addresses all the necessary environmental issues and actions.
- Q2.2.1 Natural England agrees with the applicant that increasing the stack height will reduce any ecological air quality impacts, due to the greater dispersion achieved. Therefore, assessing the lower stack height is correct as it represents the worst case scenario.
- Q2.2.2 Natural England agrees with the conclusions of the Technical Appendix 5.4 [REP3-014]. The Ramsar habitats have been assessed in tables C2 and C3 as requested by Natural England.

Any apparent discrepancy between the IAQM and EA guidance is perhaps due to issues with rounding. The IAQM guidance (which is followed in REP3-014) is to round the PC as a percentage of the CL to the nearest integer, which means that a PC less than 1% will be rounded up to 1%, and so the threshold for consideration of an effect is >1%. However, if the EA guidance is not to round to the nearest integer, then the threshold for there being no significant impacts will be <1% (not less than or equal to 1%).

Consideration of PECs for those European sites where the PC for nutrient nitrogen and acid deposition is listed in table C2 or C3 of REP3-014 as 1% of the CL is not necessary. This is because these percentages have been rounded up to 1, following

IAQM guidance, and in which case the threshold for further assessment is >1%, not greater than or equal to 1%.

- Q2.4.1 Natural England agrees with the conclusions of the revised Habitats Regulations Assessment Report [AS-022], as it takes account of the comments we had previously made.
- Q2.11.1 Natural England has no further comments to make on any of the submissions referenced AS-018 to AS-025.

Yours sincerely

Alison Giacomelli  
Sussex and Kent Area Team