



Ms S Evans
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PINS Ref: EN010090
DHA Ref: DHA/12321 Doc 15.1

3rd January 2019

Dear Ms Evans

EN010090 – THE KEMSLEY MILL K4 COMBINED HEAT AND POWER GENERATING STATION DEVELOPMENT CONSENT ORDER

DOCUMENT 15.1 – APPLICANT’S SUBMISSION AT DEADLINE 9

I write at Deadline 9 of the examination programme regarding the representations made to PINS by various parties at Deadline 8.

We note the representations by the EA, Natural England, Swale Borough Council and Harlaxton Energy and on the basis that they raise no issues do not consider it necessary to comment on those submissions.

We do consider it necessary to address the submission by Mr Vick of the 12th December 2018. DS Smith refutes any allegation that it has sought to mislead the public in making the change proposed to the draft DCO at this stage in the examination process. As documented in our letter of the 7th December 2018 the change arose as a result of a discrepancy in the originally stated dimension for the gas turbine building. Making the change at this stage was not to the benefit of the applicant as it prevented any potential early close of the examination and DS Smith notified the Inspectorate as soon as that discrepancy was identified and prior to making a formal submission to seek to correct the error. The change proposed is minor when considered in the context of the scheme overall, and there remained sufficient time within the 6 month examination period to allow any interested parties to consider and make representations on the proposal to increase the height of the gas turbine building.

Whilst not all of the points made by Mr Vick in the representation are considered to be relevant to the determination of this particular application, the comments in respect of views from the country park, light pollution from the mill site, noise and congestion at the junction with the A249 are noted and are addressed below. In addition we note the concern that K4 does not represent a replacement of an existing facility; that is directly addressed by draft Requirement 6 which provides for the decommissioning of the existing K1 facility.

As set out in our letter of the 7th December 2018 the proposed change to the height of the gas turbine building would not result in any additional significant adverse effects on landscape, townscape or visual receptors over those identified in the originally submitted

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Environment Statement. In views from the country park, to the south-west, the gas turbine building would be obscured by existing buildings of the paper mill together with higher elements of the K4 facility itself. In longer views the proposed change in height of the gas turbine building would be imperceptible.

There would be no increased potential for light pollution arising as a result of the proposed change to the height of the gas turbine building, given the nature of the proposed change and particularly as Requirement 9 of the draft DCO would still apply and requires the approval of a scheme for the management and mitigation of artificial light emissions at the construction, operation and decommissioning stages of the project. Similarly the proposed change would not alter the conclusions of the original Environmental Statement, which states that no significant noise or vibration effects are predicted to arise from the proposed development.

The proposed change to the height of the gas turbine building will have no impact on the assessment and conclusions of Chapter 4 of the Environmental Statement (Document 3.1) which concludes that there would be no significant effects arising from vehicles associated with the construction and decommissioning of the proposed K4 facility and that operational vehicle movements would be negligible.

I trust these comments are useful and please do not hesitate to contact me should you require any further clarification prior to the closure of the examination.

Yours sincerely,



David Harvey
Director

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