

---

# **MedwayOne, Former Kingsnorth Power Station**

## **Environmental Statement Non-Technical Summary**

Prepared on behalf of Uniper UK Ltd

March 2021

# MedwayOne, Former Kingsnorth Power Station

## Environmental Statement

### Non-Technical Summary

Prepared on behalf of Uniper UK Ltd

Project Ref:	29497/A5/NTS	
Status:	Draft	Final
Issue/ Rev:	01	02
Date:	March 2021	March 2021
Prepared by:	JO	JO
Checked by:	RD	RD

Barton Willmore LLP  
7 Soho Square  
London  
W1D 3QB

Tel: 020 7446 6888



#### COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetation oil based inks.

## CONTENTS

1.0	Introduction .....	1
2.0	EIA Methodology.....	3
3.0	Site and Development Description .....	8
4.0	Alternatives and Design Evolution .....	13
5.0	Construction Methodology and Sequencing .....	15
6.0	Socio-economics .....	17
7.0	Landscape and Views.....	19
8.0	Biodiversity .....	21
9.0	Water Resources and Flood Risk .....	23
10.0	Transport and Access .....	25
11.0	Air Quality.....	27
12.0	Climate Change.....	29
13.0	Summary and Residual Effects .....	31

## FIGURES

Figure 1	Site Location Plan
Figure 2	Committed Developments Plan
Figure 3	Parcel Plan
Figure 4	Parameter Plan
Figure 5	Illustrative Masterplan
Figure 6	Socio-Economics Study Area

## 1.0 INTRODUCTION

- 1.1 Uniper UK Ltd (the Applicant) is applying for outline planning permission<sup>1</sup> for the redevelopment of the former Kingsnorth Power Station (the Site) for industrial, storage and distribution and energy uses (the Development). The Site, located within the administrative area of Medway Council (MC), extends to approximately 111 hectares (ha) and is shown at Figure 1.
- 1.2 An Environmental Statement (ES) has been prepared to support the planning application. The ES is the report of an Environmental Impact Assessment (EIA) carried out as required by the "EIA Regulations"<sup>2</sup>. This document is the non-technical summary of the ES and summarises the content and conclusions of the ES.

### Environmental Statement Availability

- 1.3 Given the current social distancing restrictions due to the Covid-19 pandemic, the ES is not available for review in hard copy in a public place at this time. The ES is available to view online: <https://www.medway.gov.uk/>.
- 1.4 Comments on the planning application can either be made via MC's website or can be forwarded to the Planning Department during normal office hours at the following address:

Development Management  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR

- 1.5 Copies of the ES can be purchased from the Environmental Planning Team at Barton Willmore:

Tel: 020 7446 6888 / Email: [IEPenquiries@bartonwillmore.co.uk](mailto:IEPenquiries@bartonwillmore.co.uk)

---

<sup>1</sup> An application for outline planning permission allows for a decision on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more 'reserved matters'.

<sup>2</sup> In this instance, SI 2017/571 as amended by 2018/695 and 2020/505

1.6 The ES may be purchased as a whole document or in separate volumes, the costs for which are as follows:

- Non-Technical Summary (NTS) - £15
- Volume 1: ES Main Text & Figures - £180
- Volume 2: ES Appendices - £250
- Volume 3: Transport Assessment - £500
- Full copy (with NTS) of the ES on CD or memory stick - £20

## 2.0 EIA METHODOLOGY

- 2.1 EIA is a procedure used to assess the likely significant effects of a proposed development on the environment. The results are written into an ES which is submitted with a planning application. This ES provides the local planning authority with sufficient information about the potential environmental effects of the Development before a decision is made on the planning application.
- 2.2 The ES predicts what the significance of each environmental effect would be, during the construction and operational phases of the Development, which is determined by two factors:
- The sensitivity, importance or value of the environment (such as people); and
  - The actual change taking place to the environment (i.e. the size or severity of change taking place).
- 2.3 Most environmental disciplines classify effects as negligible, adverse or beneficial, where effects are minor, moderate or major. Some disciplines use bespoke criteria based on published guidance. Each chapter of the ES states which effects are considered significant.
- 2.4 The ES includes a description of the current environmental conditions, known as the baseline conditions, against which the likely significant environmental effects of the Development are assessed.

### EIA Scope

- 2.5 Scoping involves focusing an ES on the likely significant effects of the development on the environment during the construction and operational stages.
- 2.6 A request for an EIA Scoping Opinion was submitted to MC on 23<sup>rd</sup> July 2020. MC adopted its EIA Scoping Opinion on 18<sup>th</sup> September 2020. The following subject areas have been included in the ES:
- Socio-economics;
  - Landscape and Views;
  - Biodiversity;
  - Water Resources and Flood Risk;
  - Transport and Access;

- Air Quality; and
- Climate Change.

### Cumulative Effects

- 2.7 An EIA must assess the potentially significant effects of a development that may arise when combined with other major development with planning permission or under construction in the local area.
- 2.8 The following nearby schemes (as shown on Figure 2) which have the potential to lead to likely significant effects on the environment have been considered. Below the consented developments in Table 1, there is also a single scheme at High Halstow which is considered to be 'reasonably foreseeable' but no application has been submitted to date. This scheme has been included in the cumulative assessment of this ES.

**Table 1: Committed Developments**

Scheme	Status	Distance from the Site
<p>Gridlink Interconnector, Kingsnorth Power Station (ref. MC/20/2738)</p> <p>The construction, operation and maintenance of a converter station, balance of plant and equipment, buildings related to materials storage and maintenance activities, internal roads and car parking, landscaping, access road and underground HVDC cable system from the converter station to the Mean High Water Springs.</p>	Approved March 2021.	Within the Site boundary.
<p>Gridlink Interconnector, Kingsnorth Power Station (ref. MC/21/0028)</p> <p>Application for a Lawful Development Certificate (proposed) for the installation of an underground 400 kV cable system between the new Gridlink Interconnector Ltd converter station site and the existing National Grid ESO Kingsnorth 400 kV sub-station located at the Kingsnorth Power Station.</p>	Approved March 2021.	Within the Site boundary.
<p>Damhead Creek II Power Station</p> <p>Combined Cycle Gas Turbine (CCGT) electricity generating station up to 1800 MW capacity.</p>	Section 36 Electricity Act variation to consent (ref. DAM/B/2.4/S36C Application)	Adjacent to the northern part of the Site boundary.
<p>Kingsnorth Quarry Lane to the south of Stoke Road (ref. MC/12/0020)</p> <p>Variation of Condition 14 of planning consent MC/05/0589 – extraction and processing of sand and gravel, establishment of ready-mix concrete plant, restoration to agriculture and water-based</p>	Approved January 2013 works ongoing until 2024.	Approximately 350m to the west.

<p>conservation to defer the commencement date. It is proposed that the minerals will be worked in a phased manner, with progressive restoration taking place over an anticipated 11 years. An ES was submitted with the planning application to vary Condition 1.</p>		
<p>Kingsnorth Industrial Estate (ref. MC/08/0370)</p> <p>Outline application for the construction of a business park of up to 250,992 sqm for business, general industrial and storage and distribution uses B1C (20,752sqm), B2 (115,120sqm) and B8 (115,120sqm) with landscaping, parking and access.</p> <p>Reserved matters applications and discharge of conditions:</p> <ul style="list-style-type: none"> <li>• Ref. MC/10/1342: Reserved Matters Application for appearance, landscaping and scale of outline MC/08/0370. Approved in January 2011. Built out.</li> <li>• Ref. MC/13/0541: Reserved Matters Application for appearance, layout, scale and landscaping of outline MC/08/0370. Approved in May 2013.</li> <li>• Ref. MC/14/3646: Reserved Matters Application for appearance, layout, scale and landscaping of outline MC/08/0370 for development at Plot 5. Approved January 2015. Built out.</li> <li>• Ref. MC/15/1658: Reserved Matters Application for appearance, layout, scale and landscaping of outline MC/08/0370 for development at Plot 1. Approved with conditions in August 2015. Plot 1A unit built out.</li> <li>• Ref. MC/16/0479 and Ref. MC/16/0475: Reserved Matters Application for appearance, layout, scale and landscaping of outline MC/08/0370 for development at Plot 4. Approved with conditions in April 2016. Plot 4 unit built out.</li> <li>• Ref. MC/18/1878: Reserved Matters Application for appearance, layout, scale and landscaping of outline ref. MC/08/0370. Approved in September 2018. Not yet built.</li> <li>• Ref. MC/18/1979: Reserved Matters Application for appearance, layout, scale and landscaping of outline MC/08/0370. Approved in October 2018. Not yet built.</li> <li>• Ref. MC/19/2757: Development of Plot 1B incorporating the construction of a warehouse building including Class B1(c) light industrial/ B2 general industrial/ B8 storage and distribution uses, access, parking, drainage, landscaping and associated works including means of access. Approved in October 2019. Not yet built.</li> </ul>	<p>Approved 2011 and currently being built out.</p>	<p>Approximately 500m to the north.</p>
<p>Stoke Road Business Centre, Stoke Road (ref. MC/17/4424)</p> <p>Outline planning application for up to 200 residential dwellings.</p>	<p>Approved August 2018. Subsequent reserved matters application was approved in July 2019 (ref. MC/19/0888)</p>	<p>Approximately 1.2km north-west.</p>



Land south of Stoke Road, Hoo St Werburgh (ref. MC/19/3129)  Outline application for up to 100 dwellings.	Approved November 2019.	Approximately 1.3km north west
Land at White House Farm Stoke Road (ref. MC/18/0247)  Outline planning application for up to 65 dwellings.	Approved July 2018. Subsequent reserved matters application was validated in July 2019 (ref. MC/19/1736) and approved with conditions in March 2020.	Approximately 1.6km to the north west.
Street Farm, Stoke Road (ref: MC/15/0098)  Redevelopment of former farm site to provide a residential development of up to 50 dwellings.	Approved November 2016. Subsequent reserved matters application has been approved (ref. MC/18/1795).	Approximately 1.7km to the north west.
Land south of Ratcliffe Highway Junction with Bells Lane (ref. MC/17/1884)  Demolition of existing buildings and structures and redevelopment of the land south of Ratcliffe Highway, with a detailed application to provide up to 232 residential units with access, landscaping and open space.	Approved November 2017.	Approximately 2.9km to the north west
Land at Hillcrest, Ratcliffe Highway (ref. MC/19/3328).  Detailed application for 21 dwellings including affordable housing, together with access, parking, landscaping and infrastructure works	Application validated December 2019.	Approximately 2.95km to the north west.
National Grid Property Holdings Grain Road (ref. MC/09/1628)  Outline application for up to 464,685 sqm of built employment floorspace (Use class B1(c), B2 & B8) and up to 245 sqm of business park management centre with associated infrastructure and access.  The outline application was revised in March 2015 (MC/15/0702) with an application for approval of reserved matters to MC/09/1628 approved in July of 2015 with conditions (Ref: MC/15/1051).	Approved March 2010.	Approximately 5km to the north east.
<b>Reasonably Foreseeable Development: Planning Reference and Description</b>	<b>Status</b>	<b>Distance from the Site</b>
Land South of Britannia Road, High Halstow  Environmental Scoping Opinion Request for provision of up to 790 dwellings, two form entry primary school, provision of a retail unit or GP/pharmacy and access.	Decision of EIA required, 23 <sup>rd</sup> April 2020 (ref: MC/20/0721).	Approximately 2.2km to the north west.

## Stakeholder Engagement and Consultation

- 2.9 A key role in the EIA process is to ensure consultation has taken place with key parties. This planning application is the culmination of a design process which has involved consultation with MC, nearby parish councils and local and regional stakeholders.
- 2.10 The organisations consulted as part of the EIA process include:
- MC (various departments);
  - Kent County Council;
  - Natural England;
  - Highways England;
  - Environment Agency (EA); and
  - Historic England.
- 2.11 Consultation with the local community commenced on 3<sup>rd</sup> February 2021, when a consultation website was launched ([www.medwayone.co.uk](http://www.medwayone.co.uk)) which included a public virtual exhibition room, a 'flythrough' video and information and details of how to join the public question and answer sessions that were held on 11<sup>th</sup>, 13<sup>th</sup> and 15<sup>th</sup> February 2021. The website also included consultation materials available to download such as feedback forms, information leaflet, Q&A presentation slides and exhibition boards.

## 3.0 SITE AND DEVELOPMENT DESCRIPTION

### Site Context

- 3.1 The Site (see Figure 1) is located on the Hoo Peninsula, approximately 2 kilometres (km) east of Hoo St Werburgh. The southern boundary of the Site is bound by the River Medway Estuary. Adjacent to the north of the Site is Damhead Creek CCGT Power Station, which is operational. The consented Damhead Creek CCGT Power Station II, which is awaiting construction, is also located adjacent to the northern boundary of the Site and east of the existing Damhead Creek CCGT. Further to the north of the Site is the Kingsnorth Industrial Estate, comprising industrial and manufacturing uses. It also extends into London Medway Commercial Park (which comprises industrial and storage and distribution uses).
- 3.2 Adjacent to the north-east of the Site is Damhead Creek, which flows into East Hoo Creek to the east of the Site. East Hoo Creek flows into the River Medway to the south-east. The Medway Estuary and Marshes extends to the north-east, east and south-east of the Site.
- 3.3 The main access onto the Hoo Peninsula is via the A228 Peninsula Way, with the peninsula defined broadly by its agricultural uses and small settlements. Access to the Site is provided from Eschol Road, which adjoins Stoke Road to the north-east and Jacob's Lane to the south-west. Stoke Road provides access to Hoo St Werburgh to the west and village of Upper Stoke to the east.

### Site Description

- 3.4 The Site is irregularly shaped and extends to approximately 111 hectares (ha) and is formed of four parcels of land (Parcels 1, 2, 3 and 4) (refer to Figure 3). The Site comprises primarily previously developed land, associated with the former Kingsnorth Power Station, which was coal fired, and located on Parcel 3 before it closed in 2012. The Site has been de-commissioned, demolition works have been completed and the southern and central areas of the Site are now dominated by hardstanding. The four parcels of land comprise the following:
- Parcel 1, which is located in the northern part of the Site, comprises overgrown pasture and scrub to the west of the existing access road and overgrown historic hardstanding to the east of the access road;
  - Parcel 2, which is located in the western extent of the Site, comprises a brick plant kiosk/security office and extensive areas of hard standing;

- Parcel 3, which is located in the southern extent of the Site, comprised the area which housed the coal fired power station, coal stock yard and associated tank farms and covered by expansive areas of hardstanding. Parcel 3 also includes a multi-storey structure associated with the Long Reach Jetty (which is adjacent to the Site); and
  - Parcel 4, which is located in the eastern extent of the Site and is largely undeveloped.
- 3.5 Two planning applications on the eastern boundary of Parcel 3 (refs. MC/20/2738 and ref. MC/21/0228), including an application for an interconnector, were approved by MC in March 2021 (detailed in Table 1 above). These applications do not comprise part of the Development and neither does the Development rely on them in any way.

### Description of Development

- 3.6 The Applicant is submitting an outline planning application with all matters reserved<sup>3</sup> for future determination except for access, in line with the formal description of the Development included below:

*'Outline planning application, with all matters reserved except access (to be taken from Eschol Road), for the erection of flexible E(g)(iii)/B2/B8 use class buildings, sui generis uses for energy uses and a lorry park, together with servicing, parking, landscaping, drainage, remediation, demolition and earthworks.'*

### Demolition

- 3.7 The Development includes the demolition of the existing brick plant kiosk/security office located in Parcel 2. The multi-storey structure on Parcel 3 will be retained as part of the Development.

### Land Use

- 3.8 The land uses proposed within the Development are detailed in Table 2 and the areas for built Development are shown on Figure 4 Parameter Plan. Table 2 details the maximum floorspace that could be implemented for each land use and which has been assessed in the ES.

---

<sup>3</sup> Reserved matters are the details of the original outline application which have been reserved for future approval.

**Table 2: Land Use**

Use Class	Maximum Use Class Floorspace Gross Internal Area (GIA) (sqm)	Maximum Use Class Floorspace Gross External Area (GEA) (sqm)
E(g)(iii)	Up to 33,000sqm	Up to 33,990sqm
B2	Up to 157,500sqm	Up to 162,225sqm
B8 (non-data centre)	Up to 315,000sqm	Up to 324,450sqm
B8 (data centre)	Up to 87,379sqm	Up to 90,000sqm
B8 (parcel distribution only)	Up to 60,000sqm	Up to 61,800sqm
Sui generis (energy uses)*	Up to 60,000sqm	Up to 61,800sqm
Sui generis (lorry park/layover)	40-50 spaces together with associated facilities (site area up to 1ha)	

Note: \* includes floorspace for energy uses up to a maximum power output of 49.9MW that may fall within Sui Generis Use Class

3.9 The total amount of built floorspace for the Development would not exceed 315,000sqm GIA/ 324,450sqm GEA. The number of vehicle trips generated by the Development would not exceed 615 vehicle trips for the AM period and 598 trips for the PM period.

#### Building/Barrier Heights

3.10 The proposed maximum heights of the Development are shown on Figure 4 Parameter Plan. The following building heights have been applied across the Development (and are more precisely indicated on Figure 4):

- Up to 15m above finished floor level (FFL) (to 20m above ordnance datum (m AOD)<sup>4</sup> in Parcels 1 and 2 in the northern and western parts of the Development;
- Up to 25m above FFL (up to 29m AOD) in the eastern extent of Parcel 3 (in the eastern part of the Development); and
- Up to 45m above FFL (up to 50m AOD) in the central parts of the Development (on Parcel 4 and the western extent of Parcel 3). Both parts would also allow for a stack at 100m in height above FFL.

3.11 The Development includes an acoustic barrier up to 3m (6.6m AOD) in height on top of a potential flood defence bund on Parcel 1 and along the northern part of the existing flood defence on Parcel 2.

<sup>4</sup> A measurement used to derive altitude which relates to the mean sea level calculated from observation taken at Newlyn, Cornwall.

### Green Infrastructure

- 3.12 Figure 4 Parameter Plan shows the green infrastructure proposals for the Site. These areas largely provide a buffer between areas of built Development and the boundary of the Site, as well as provide an interconnected network of habitats across the Site, which also connect with the wider area.
- 3.13 Parcel 4 includes a 40m wide ecological 'no buildings' zone as part of the proposed green infrastructure for the Development. This takes into account an existing Natural England Newt License, associated with the previous operations of the Site.
- 3.14 Figure 5 Illustrative Masterplan shows one way in which green infrastructure could be implemented at the detailed design stage of the Development.

### Access

- 3.15 Primary vehicular access to the Development will be from Eschol Road, which adjoins Stoke Road to the north east and Jacob's Lane to the south-west, as shown on Figure 4. The Development will upgrade the existing access to the Site which comes through Parcel 1 and along the north-eastern boundary of Parcel 2. A 'zone' has been identified for the primary access road through Parcel 3. Parcel 4 can be accessed off the primary access, either through Parcel 2 to the west or Parcel 3 to the south. The primary access is intended to comprise a 7.5m carriageway, with tree line verge and 3m shared pedestrian/cycle path.
- 3.16 The Development will also include the addition of a new footway/cycleway which will run along the Site frontage to the east, running parallel with Eschol Road before crossing to the northern side of the road where it will connect existing cycle/footpath connections at the roundabout which serves the adjacent Kingsnorth Industrial Estate.

### Drainage

- 3.17 The Site benefits from protection from existing coastal flood defences and the Development will provide an additional flood defence bund along the western boundary of Parcel 1 at a maximum height of 6.6m AOD.
- 3.18 The surface water drainage strategy for the Development broadly comprises the discharge of all surface water run-off from hard surfaced areas into local drainage networks. These in turn

would outfall to the tidal River Medway. Sustainable drainage system<sup>5</sup> (SuDS) features will be provided in areas of proposed green infrastructure.

### Lighting

- 3.19 The lighting scheme for the Development would be designed at the detailed design stage. All external lighting installations are to be designed in line with the Institution of Lighting Engineers (ILE) Guidance notes on reduction of obtrusive light<sup>6</sup>.

---

<sup>5</sup> SuDS are a natural approach to managing drainage in and around developments. They work by slowing and holding back the water that runs off from a site, allowing natural processes to break down pollutants.

<sup>6</sup> Institution of Lighting Professionals, 2012. *Guidance Notes for the Reduction of Obtrusive Light GN01:2011*

## 4.0 ALTERNATIVES AND DESIGN EVOLUTION

4.1 The EIA Regulations require an ES to detail any alternatives that have been considered to the development submitted for planning permission. The alternatives considered in the ES include the following:

- No Development;
- Alternative Locations and Uses; and
- Alternative Designs.

### The 'do nothing' Alternative

4.2 Under the 'do nothing scenario', the Site would remain in its existing use as a largely cleared brownfield site. The beneficial and adverse effects outlined in this ES would not occur.

### Consideration of Alternative Locations, Uses and Designs

4.3 The Development comprises a mix of employment uses, for which there is a known demand. It would provide continuity in employment generation at the Site and buildings that are suitable for modern occupation.

4.4 Due to the size of the Site and its spatial location in close proximity to key markets around the south-east, the Development includes a range of uses such as industrial, commercial, logistics, energy and associated uses in a modern high-quality employment centre. The Development includes a mix of uses to remain flexible to best match any future demand for specific uses at the Site. Accordingly, no alternative locations or uses for the Site has been considered.

4.5 Given the outline nature of the planning application to regenerate a significant brownfield site, the proposals are defined in terms of a series of development parameters defined by the Parameter Plan (Figure 4). The Parameter Plan was developed from a comprehensive baseline assessment presented throughout this ES. This baseline information defined the areas of constraint which required mitigation to be secured by parameters. These parameters include building height limits, buffer zones from sensitive areas/receptors, proposed developable areas, strategic planting, and protection and enhancement of ecologically sensitive areas.

4.6 In addition to the above, issues raised during the consultation process have been addressed and amended in the design evolution of the Development which has led to the Parameter Plan



(Figure 4) submitted for approval. The main issues raised during the consultation process are summarised in Table 3 below.

**Table 3: Issues raised in the design and consultation process**

Issues raised	Amendments in the design of the Development	Comparison of environmental effects
Impact on the landscape owing to the scale and massing of the Development	Concentration of taller elements of the Development towards the centre of the Site in the location of the former Kingsnorth Power Station and adjacent to the existing Damhead Creek Power Station.	The Development would give rise to less adverse landscape effects than earlier iterations.
Impacts on ecology and wildlife	<ul style="list-style-type: none"> <li>• Inclusion of a 40m wide ecological no build zone in Parcel 4 in respect of species which are sensitive to lack of sunlight;</li> <li>• A 20m wide green corridor separates the different parcels of land within the south of the Site to enable species to move across the Site; and</li> <li>• The removal of land parcels to the east and west of the Site which are statutory designated sites and therefore overall reduction in the Site boundary to prevent impact on these ecologically sensitive sites.</li> </ul>	The Development would give rise to less adverse effects on ecology than earlier iterations.
Inclusion of additional flood defences	Design meetings and modelling analysis identified the need for additional flood defences to maintain the Site and accounting for climate change impacts. As such, the Development includes a zone for a flood defence bund within Parcel 1.	The Development would maintain the current Standard of Protection with regards to flood defences.
Noise impacts on sensitive receptors	Zones for acoustic fencing were incorporated into Parcels 1 and 2 as a result of noise modelling analysis to ensure the Development would not significantly impact the residential receptor at Burnt House Farm.	The Development would give rise to less adverse effects on noise sensitive receptors than earlier iterations.

## 5.0 CONSTRUCTION METHODOLOGY AND SEQUENCING

- 5.1 Planning for construction is broad at this stage. The assessment of construction phase environmental effects is based on reasonable assumptions and experience.
- 5.2 The construction of the Development is anticipated to commence in 2021, subject to gaining planning permission. It is expected to be fully operational by 2031 and built out in an east to west approach.
- 5.3 Elements of the construction programme would overlap and construction would include the following stages:
- Remediation works<sup>7</sup>;
  - Access road construction and enabling works<sup>8</sup>;
  - Site preparation (including excavation and site levelling);
  - Foundation works and piling;
  - Infrastructure works;
  - Drainage works;
  - Construction of substructure;
  - Construction of superstructure; and
  - Landscaping.

### Vehicle Movements

- 5.4 Construction vehicle movements would be managed to minimise the impact on the local road network. HGV movements would be dispersed across the working day outside of the morning and evening peak periods.
- 5.5 It is intended that construction HGV traffic would approach and leave the Development via the strategic and main road network. For the purposes of this assessment, it has been assumed that all HGVs would access the Site via Eschol Road, Stoke Road, Ropers Lane and the A289, thereby avoiding built up areas.
- 5.6 Construction routes to the Site would be reviewed in detail and agreed as part of a plan for the management of construction traffic to be agreed with MC.

---

<sup>7</sup> A remediation strategy for the Site has been agreed in principle with the Environment Agency and submitted in support of the planning application.

<sup>8</sup> Site preparation works that would take place prior to work under the main construction contract.

## Hours of Work

5.7 Working hours on the Site would be agreed with MC. However, it is likely that standard hours of work would be adhered to, these are:

- Monday to Friday, 8am to 6pm;
- Saturday, 8am to 1pm; and
- Sundays and Bank Holidays, no noisy activities on-Site.

5.8 All work outside these hours would be subject to prior agreement of, and/or reasonable notice to MC as appropriate. Night-time working would be restricted to exceptional circumstances, and work internally with buildings. By arrangement, there may be some out of hours construction deliveries made to the Site.

## Environmental Management

5.9 In addition to the traffic management plan, a Construction Environmental Management Plan (CEMP) would be prepared for the Development. This is a document that would provide methods for managing environmental issues, such as noise and dust during construction. Measures would include details of prohibited or restricted operations (location, hours etc.) and the mechanism for the public to register complaints and the procedures for responding to such complaints.

## 6.0 SOCIO-ECONOMICS

6.1 The ES has assessed the likely significant effects of the Development on socio-economic issues. This assessment has been based on information available from sources, including the Office for National Statistics.

### Baseline Conditions

6.2 The socio-economic assessment identified the effects of the Development within the Study Area shown in Figure 6. The current socio-economic conditions of this Study Area comprise the following:

- The Site currently supports employment equivalent to 2 full time equivalent (FTE) jobs;
- Overall levels of unemployment for the MC area (for those aged between 16 and 64) are 4.9%, which is higher than the national average;
- In February 2020, there were 115 residents in the Study Area claiming unemployment related benefits and by November 2020, this had doubled to 250;
- The majority of employment within the Study Area is within the Mining, Quarrying and Utilities industry (accounts for 23% of all employment) which is significantly higher when compared to the Hoo Peninsula, the MC area and England;
- 36% of workers commute to the Study Area from a destination outside of the MC area.

### Construction Phase Effects

6.3 The various elements of the Development would generate an average of 725 full time equivalent (FTE) workers for the duration of its construction. In addition to this direct employment, there would be indirect benefits arising from what are known as 'spin off' benefits, such as purchasing materials and basic convenience goods from shops local to the Development. The direct and indirect jobs created during the construction phase will generate economic output in the form of gross value added (GVA)<sup>9</sup> equivalent to £72.1 million per annum. In addition, the construction work force will generate additional expenditure of £157,325, increasing workforce expenditure in the MC area by 0.8%. Overall, the Development is expected to create a moderate beneficial effect in respect of employment and economic output and a minor beneficial effect on local expenditure during the construction phase.

---

<sup>9</sup> GVA measures the contribution made to an economy by one individual producer, industry, sector or region. This figure is an assessment of the value of goods and services produced minus the cost of inputs and materials used in the production process.

### Operational Phase Effects

- 6.4 The Development is anticipated to create 936 net additional FTE jobs as a worst-case (accounting for the loss of the 2 FTE existing jobs on the Site and potential spin-off effects) which will increase employment in the MC area by 1.0%. The additional jobs will generate GVA of £43.8 million per annum, increasing GVA in the MC area by 0.9%. In addition, the net additional jobs could generate £203,112 in convenience in expenditure per annum, increasing workforce expenditure in the MC area by 1.0%. On this basis, the operational phase of the Development would result in a moderate beneficial effect on employment and economic output and a minor beneficial effect on workforce expenditure.

### Cumulative Effects

- 6.5 When the committed developments are considered, there are anticipated to be temporary moderate-minor beneficial cumulative effects on construction employment, economic output and expenditure and permanent major – moderate beneficial cumulative effects on operational employment, economic output and workforce expenditure.

## 7.0 LANDSCAPE AND VIEWS

- 7.1 The ES assesses the likely significant effects of the Development on the environment in respect of landscape and views.
- 7.2 The Site has been subject to a visual appraisal, identifying the visibility of the Site from surrounding areas. 21 locations of publicly accessible viewpoints which are sensitive to changes in views have been identified for the assessment and agreed with MC, including an additional location in Riverside Country Park.
- 7.3 The assessment within the ES sought to identify how the character of the existing area, the landscape, would change as a result of the Development, and how the views of people living and working in the local area would change.

### Baseline Conditions

- 7.4 The majority of the Site is within Kent Council's 'Medway Marshes' Landscape Character Area (LCA) with the north-western edge of the Site situated within MC's LCA 12 'Lower Stoke Farmland'. The character of the Site varies between the Parcels. However, each Parcel is considered to have low landscape sensitivity. Parcel 1 comprises overgrown pasture and scrub and overgrown historic hardstanding to the west and east of the existing access road, respectively. Parcel 2 is characteristic of cleared industrial land and is dominated by remaining large buildings. Parcel 3 is the most degraded area of the Site, characterised by areas of hardstanding with essentially no vegetation. Parcel 4 comprises an area of pastureland and has been affected by its history as part of both RNAS Kingsnorth and the former power station and is heavily influenced by the Damhead Creek CCGT to the north. The landscape of the Site is low lying and open, with the Site located on the edge of the open water of the estuary. The land rises to the north-west and south-west, providing slightly elevated viewpoints over the low-lying and sparsely developed landscape. The twin stacks of the Damhead Creek CCGT form a useful reference point in views, as do the existing buildings in Parcel 2 and the warehouses to the north and north-east of the Site.

### **Construction Phase Effects**

- 7.5 During the construction phase of the Development, there would be some views of construction works. Mitigation measures during the construction phase will include measures such as control of lighting, careful location of stockpiles and machinery into visually less sensitive areas and the protection of existing vegetation to be retained, implemented through a CEMP. Moderate adverse visual effects for users of the Medway including visitors to Fort Hoo and Fort Darnet would be generated as a result of the construction phase of the Development.

### **Operational Phase Effects**

- 7.6 The Site would change from its current vacant nature to a new development, including the creation of enhanced landscaping, open spaces and a variety of new building heights. The operational Development is anticipated to result in a moderate beneficial effect on the existing landscape character. Negligible adverse to minor adverse effects on views for users of the Medway including visitors to Fort Hoo and Fort Darnet, users of the public right of way network in close range views to the north of the Site and from the southern edge of the Medway are also anticipated.

### **Cumulative Effects**

- 7.7 The combined visual effects of the Development, Kingsnorth Industrial Estate and Damhead Creek II Power Station in views to the north east of the Site on Stoke Road will result in moderate adverse effects during construction and on completion due to the scale of development within the view. There will be no significant landscape cumulative effects upon any of the published landscape character areas during the construction or operational phases of the Development.

## 8.0 BIODIVERSITY

8.1 The ES assesses the likely significant effects of the Development on the environment with respect to ecology and nature conservation. Ecological surveys of the Site and adjacent areas have been undertaken, including a desk study, habitat surveys and species specific surveys in respect of rare plants, badger, bats, water vole, otter, great crested newt, reptiles, birds and invertebrates.

### Baseline Conditions

8.2 A number of statutory ecological designations were identified by the desk study, with the closest being Medway Estuary and Marshes Special Protection Area (SPA)<sup>10</sup>/Ramsar<sup>11</sup>/Sites of Special Scientific Interest (SSSI)<sup>12</sup> which lies adjacent to the southern Site boundary.

8.3 The Site supports significant areas of hardstanding associated with the demolished power station. Habitats that are considered to be important within the Site are open mosaic habitat (OMH), woodland, other trees, semi-improved grassland, waterbodies and off-Site intertidal mud/sand/shingles/cobbles and saltmarsh.

8.4 The Site supports bats, badger, water vole, great crested newts, reptiles, breeding birds and invertebrates. In addition, otter, common seal and grey seal are present/likely to be present off-Site in the wider area.

### Construction Phase

8.5 Prior to the implementation of mitigation measures, potentially significant construction phase effects are anticipated for Medway Estuary and Marshes SPA/Ramsar/SSSI and Functionally Linked Land at Damhead Creek, Medway Estuary MCZ, OMH, woodland, semi-improved grassland, waterbodies, off-site mud/sand and shingles/cobbles, off-site intertidal saltmarsh, Badger, Water Vole, Great Crested Newt, Breeding birds and Invertebrates. However, mitigation measures would be implemented to ensure that all residual effects on these sensitive receptors would be non-significant. These measures would include the implementation of a Dust Management Plan which would be implemented to minimise the creation of dust, a CEMP to include construction safeguards, an Ecological Design Strategy to

---

<sup>10</sup> A Special Protection Area is a designation under the European Directive on the Conservation of Wild Birds. Under this designation, there is a duty to safeguard the habitats of migratory birds and certain particularly threatened birds.

<sup>11</sup> A Ramsar site is a wetland site of international importance.

<sup>12</sup> A Site of Special Scientific Interest is a formal conservation designation; an area that is of particular interest to science due to the rare species of fauna or flora it contains or important geological or physiological features.



ensure the delivery of habitat creation, enhancements and landscaping across the Site, sensitive lighting design and a Construction Method Statement for all works proposed in Parcel 3.

### **Operational Phase**

- 8.6 The Development has been designed to incorporate mitigation measures into the design, with the key elements being the establishment of green infrastructure corridors around and across the Site. The corridors have been designed to maintain and enhance habitat connectivity across the Site for more mobile species, such as badgers and commuting and foraging bats. The Development also retains the vast majority of habitat where reptiles have been recorded, retained and buffer all habitats where water vole has been recorded and retain habitat associated with key breeding bird territories. In addition, a 40m building stand-off has been included in Parcel 4 to ensure that the proposed buildings do not overshadow the retained habitats. With the implementation of these and other mitigation measures, the Development's operational phase will result in effects which are not considered to be significant and indeed, neutral-slight positive and slight positive effects for a number of important ecological features are anticipated. In addition, moderate positive effects are predicted in relation to waterbodies and water vole.

### **Cumulative Effects**

- 8.7 As no significant negative residual effects have been identified as a result of the Development or any of the committed developments, significant cumulative effects from the Development are not anticipated.

## 9.0 WATER RESOURCES AND FLOOD RISK

- 9.1 The ES assesses the likely significant effects of the Development on the environment with respect to water resources and flood risk. The assessment is supported by a Flood Risk Assessment and Drainage Strategy.

### Baseline Conditions

- 9.2 The majority of the Site is designated Flood Zone 3, considered to be at high risk of flooding from the River Medway. The closest watercourse to the Site is the River Medway, which is an EA designated main river and is present immediately to the south of the Site. The Damhead Creek which is designated as an ordinary watercourse is also present, immediately to the east of the Site. The Site benefits from flood defences along the bank of the River Medway with a protection for events up to a 1 in 1,000 year event probability. Secondary flood defences are also present along Damhead Creek and around the perimeter of the former Kingsnorth Power Station.
- 9.3 The majority of the Site is currently at very low risk of flooding from surface water, with localised areas at low risk of flooding from surface water. No other significant risk of flooding was identified.

### Construction Phase Effects

- 9.4 The construction activities of the Development have the potential to have a significant effect on flood risk through the increase in impermeable areas within the construction compounds as well as on water quality of nearby watercourses and ecological habitats. A CEMP will be implemented during the construction phase which will include measures to control runoff from the construction works such as appropriate storage and siting of stockpiles and spill procedures. All construction compounds will include temporary construction drainage in order that no increase in surface water is caused. They will be located away from the ecological habitats and the River Medway / Medway Estuary.
- 9.5 With the proposed mitigation measures outlined, the residual effect of the construction work on on-Site and off-Site receptors with regards to water resources and flood risk is expected to be minor adverse and therefore not significant.

### Operational Phase Effects

- 9.6 A surface water drainage strategy has been developed which will prevent any increase in runoff caused by the Development, with an allowance for additional runoff caused by climate change. The proposed surface water drainage strategy will incorporate oil separators and sediment management measures in order that water discharged into the Medway Estuary has low concentrations of suspended solids and oils that could impact on water quality. Operational management plans will be in place throughout the Development's operational phase, which will incorporate emergency spill procedures and ongoing water quality monitoring to ensure that no adverse pollution is caused to surrounding habitats. With the implementation of mitigation measures, it is predicted that the residual effects of the operational/ maintenance activities on water resources and flood risk will be minor adverse, which is not significant.

### Cumulative Effects

- 9.7 The identified committed developments will be required to implement a series of construction mitigation measures, resulting in the residual effects to be minor and not significant. Any works undertaken within 8m of a watercourse and / or flood defence and within 16 m of tidal defence will require consent. For the consent to be provided the developer is required to demonstrate that the risk of flooding during the lifetime of the development could be mitigated to a level acceptable to the EA, the Leading Local Flood Authority and / or the Lower Medway Internal Drainage Board. In addition, the committed developments will be required to demonstrate that the operational phase has a limited effect on water quality and will not increase flood risk to the site or the surrounding area. Without this, the committed developments cannot achieve planning permission. Therefore, the committed developments, along with the Development will include a series of operational mitigation and management measures which will limit any adverse effects on the Development.
- 9.8 Overall, negligible cumulative effects are predicted as a result of the Development in combination with the identified committed developments.

## 10.0 TRANSPORT AND ACCESS

10.1 The ES assesses the likely significant effects of the Development on the environment with respect to transport and access. The assessment is supported by a Transport Assessment.

### Baseline Conditions

10.2 The Site is accessed from Eshcol Road which is a two-way single carriageway that routes between Jacobs Lane and Stoke Road. Via Eshcol Road, Jacobs Lane, Stoke Road and Ropers Lane, the Site connects to the A228 Peninsula Way/Four Elms Hill which is the main strategic network leading onto the Hoo Peninsula.

10.3 There are currently no bus stops within walking distance of the Site. The nearest bus stops are located in Hoo, approximately 3km to the east, and on Ratcliffe Highway, approximately 3.5km to the north. The nearest railway station to the Site is located at Strood, which is approximately 7km to the west. By road, this equates to approximately 10.5km, or a 15-20 minute drive. Strood Railway Station provides connectivity to destination such as London St Pancras International, Luton, Tonbridge, Rainham and Faversham.

10.4 Hoo can be reached on foot within 30 – 40 minutes, depending on the destination and when taking the existing footways along Eshcol Road and Stoke Road. The Site is well served by a number of public right of ways. To the west of the Site, Footpath RS92 connects the Site to Hoo via a series of public right of ways, including footpaths and restricted byways. National Cycle Network Route 179 can be accessed from the Site within 1.5km or a 5-minute cycle ride at the Ropers Lane/Stoke Road roundabout.

### Construction Phase Effects

10.5 The following effects in relation to transport and access were assessed using published guidance:

- Severance;
- Driver delay;
- Pedestrian delay;
- Pedestrian amenity; and
- Accidents and safety.

10.6 In terms of mitigation during the construction phase, a CEMP would be implemented to minimise and mitigate any effects from construction traffic. The CEMP to be implemented would include the appropriate routing and timing of construction traffic to minimise effects on sensitive receptors. All construction phase effects of the Development would be negligible following the implementation of these mitigation measures.

### **Operational Phase Effects**

10.7 For the operational Development, all effects would be negligible, following the implementation of the following mitigation measures:

- Site-wide Framework Travel Plan;
- Car Sharing scheme;
- Dedicated car share spaces;
- Cycle parking, washing, changing and storage facilities;
- Electric vehicle charging points;
- Cycle route along Eschol Road connecting existing cycle routes to the Site;
- Active travel corridor through the Site, providing pedestrian and cycle access to each building;
- Enhancements to Bus Services and / or dedicated staff shuttle bus services; and
- Sustainable Distribution Plan for larger vehicle movements associated with the Site.

10.8 Local highway improvement schemes which are planned for delivery by 2024 will help increase capacity on the local highway network. In the unlikely event that schemes are not implemented, alternative schemes that mitigate the impact of the Development have been prepared and may be secured through financial contribution or direct delivery may be agreed with appropriate parties.

### **Cumulative Effects**

10.9 All cumulative effects have been taken into account in the construction phase and completed Development phase assessments and do not require further consideration.

## 11.0 AIR QUALITY

- 11.1 The ES assesses the likely significant effects of the Development on the environment with respect to air quality.

### Baseline Conditions

- 11.2 The Site is not located within or adjacent to an Air Quality Management Area<sup>13</sup> (AQMA). The nearest AQMAs are Four Elms Hill AQMA and Gillingham AQMA. Four Elms Hill AQMA was declared in 2017 for annual mean NO<sub>2</sub> concentrations. It is located along Four Elms Hill in Chattenden, which is approximately 4km to the west of the Site. The Gillingham AQMA was declared in 2010 for annual mean NO<sub>2</sub> concentrations. It is located along Pier Road in Gillingham, approximately 3.6km to the southwest of the Site. Surrounding sources of air pollution include the Damhead Creek CCGT Power Station and beyond this, the Kingsnorth Industrial Estate.

### Construction Phase Effects

- 11.3 An assessment of the potential effects during the construction phase identified that releases of dust and particulate matter are likely to occur during site activities. Through good site practice and the implementation of suitable mitigation measures secured through a CEMP, the effect of dust and particulate matter releases may be effectively mitigated and the resultant effects are negligible.

### Operational Phase Effects

- 11.4 The assessment of operational effects of the Development on local air quality has shown that that pollutant concentrations are predicted to be below the relevant limits at the sensitive human receptors in the vicinity of the Site. The impact is determined to be medium in accordance with the Medway Council Air Quality Planning Guidance significance criteria at a number of receptors along the key roads leading to the Site in particular along the A228. Overall, the impact is classed as negligible. In addition, the impact of the deposition of pollutants on nearby sensitive ecological habitats was identified to be insignificant.

---

<sup>13</sup> If a local authority finds any places where the air quality objectives are not likely to be achieved, it must declare an AQMA. Following this, a plan must be prepared by the borough which sets out measures seeking to reduce the effects on air quality.

## **Cumulative Effects**

11.5 Negligible effects have been assessed when the committed developments are considered.

## 12.0 CLIMATE CHANGE

- 12.1 The ES assesses the likely significant effects of the Development on the environment with respect to climate change.

### Baseline Conditions

- 12.2 The climate profile is taken from the closest available data source to the Site, which is located at Gillingham FC, approximately 4.5km to the south-west. Regionally, the climate is warm and temperate with a significant rainfall all-year-round. In a year, the average rainfall is 594.2mm (48% less than the mean annual UK rainfall). The driest month is July and the most precipitation that falls is in January.
- 12.3 Overall, carbon emissions have steadily declined within Medway over the period 2005 to 2018. There has been a downward trend in the contribution of each of the three main sources of emissions, with Industry and Commercial being the largest percentage decrease, at 48% over the thirteen year period.
- 12.4 For the future climate conditions (up to 2100), the south-east region of England, where the Site is located is set to experience hotter, drier summers and milder, wetter winters. With winter precipitation and the number of heavy rain days projected to increase, flooding events may be more likely and occur on a more frequent basis. Conversely, summer precipitation is expected to decrease. Coupled with a central estimate of summer temperatures increasing by 5.8°C, the area may experience an overall reduction in water resources. Whilst there are large uncertainties in the frequency and intensity of storms increasing under climate change, wind speeds are expected to increase slightly as well.

### Construction and Operational Phase Effects

- 12.5 Construction and operation of the Development is likely to result in emissions of CO<sub>2</sub> from direct sources and indirect sources. It is not anticipated that the scale of projected climate change identified will fundamentally alter baseline conditions or the effects included in this ES. Overall, with the design and mitigation measures proposed, the Development is considered to be resilient to projected climate change.
- 12.6 Indicative results based upon operational vehicular projections for traffic modelling scenarios for 2037 indicate that the anticipated operational emissions for traffic associated with the Development could generate effects of minor-adverse significance locally.



- 12.7 Key design principles, such as adherence to the Building Regulations, will be embedded within the Development to minimise climate risks at the Reserved Matters stage.

### **Cumulative Effects**

- 12.8 The cumulative impact of carbon emissions arising from global human activity is high. This is true to the nature of climate change as a global, cumulative problem. As committed developments have been assessed throughout this ES and particularly through the cumulative vehicular transport scenarios, the potential inter-scheme cumulative effects during the operational phase of the Development have already been considered.
- 12.9 It is assumed that all committed developments will be required to meet relevant standards for emissions reduction and to comply with related planning policy. On this basis, it is considered appropriate to assume that any applications that are consented include 'reasonable' measures to avoid, reduce and /or offset the generation of greenhouse gas emissions and therefore that no significant cumulative effects are anticipated.

## 13.0 SUMMARY AND RESIDUAL EFFECTS

13.1 The Development has been subject to a thorough analysis of environmental constraints and opportunities and as the process evolved, measures have been incorporated into the proposals to avoid, reduce or offset environmental effects. Where this has not been possible, further mitigation measures have been proposed.

13.2 In conclusion, the ES has identified that the Development would result in the following beneficial residual effects:

- Beneficial socio-economic effects following the provision of construction and operational Development phase employment and wider benefits to the local economy;
- Slight to moderate positive effects during the construction phase of the Development on internal habitats and waterbodies and the fauna present on the Site; and
- Slight to moderate positive effects from the operational Development on habitats within the Site and the fauna associated with the retention of the existing habitat and habitat creation.

13.3 The ES has also identified a number of adverse residual effects, including:

- Moderate adverse effects relating to the views of the construction phase of the Development from users of the Medway, including visitors to Fort Hoo and Fort Darnet;
- Minor adverse visual effects during the operation of the Development from users of the Medway;
- Slight negative effects during the construction phase on water vole and badger;
- Minor adverse effects during both the construction and operational phases of the Development on water resources and flood risk; and
- Minor adverse effects during the operational phase of the Development on driver delay and severance.

