Richborough Peaking Plant Facility and Internal Road Network & Landscaping

Non-Technical Summary

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Preface

This document comprised a Non-Technical Summary of the Environmental Statement that has been prepared in support of two separate planning applications, one for the Richborough Peaking Plant Facility to Dover District Council and a second for the Internal Road Network and Landscaping to Thanet District Council. The two planning applications could be delivered independently but it is anticipated that they will be delivered together and therefore the ES will be submitted to support both applications.

The Environmental Statement comprises the following documents:

- The Non-Technical Summary (this document);
- Environmental Statement - Volume I Main Report; and
- Environmental Statement - Volume II Technical Appendices.

In addition to the above, the Environmental Statement is accompanied by planning application documents including: cover letter; forms and schedule; and planning application drawings.

Further copies of these reports, or further information on the proposed development, can be obtained from:

Peter Bovill
Montagu Evans
5 Bolton Street
London
W1J 8HB

Copies of the full Environmental Statement and Technical Appendices can be purchased as a hard copy for £250 (Environmental Statement £100, Technical Appendices £150). Electronic copies on CD are available for a fee of £5.

The Environmental Statement can be viewed by the public during normal office hours at the offices of the Planning Department of either Thanet District Council or Dover District Council, at:

Thanet District Council,
Planning Department,
PO Box 9
Cecil Street
Margate

or

Dover District Council,
White Cliffs Business Park,
Dover,
Kent CT16 3PJ

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Non-Technical Summary

1. Introduction

1.1 Overview

Richborough Management Company Limited (the ‘Applicant’) is seeking full planning permission for the construction and operation of a Peaking Plant Facility, in addition to an Internal Road Network and Landscaping, at the former Richborough Power Station site on Ramsgate Road, Sandwich, CT13 9NL (hereafter referred as the ‘Proposed Development Site’).

The Proposed Development comprises two separate planning applications to two separate local planning authorities: one for the Peaking Plant Facility to Dover District Council (DDC) and another for the Internal Road Network and Landscaping to Thanet District Council (TDC). Duplicate applications have also been submitted to each council in recognition that each site extends into both administrative areas.

It is important to note that the Proposed Development has been designed so to allow either application to progress independently of the other, although it is the Applicant’s intention that both the Peaking Plant Facility and the Internal Road Network and Landscaping should be built simultaneously.

The Peaking Plant Facility and Internal Road Network and Landscaping are together referred to as the ‘Proposed Development’. Following discussions with TDC and DDC these two planning applications have both been assessed within a single Environmental Statement (ES).

1.2 The Site

The former Richborough Power Station site is located in northeast Kent, approximately 4 kilometres (km) to the southwest of Ramsgate, 3.5km north of Sandwich and 1.6km inland from the east Kent coastline. A site location plan is shown in Figure NTS-1.

The Proposed Development Site comprises an area of approximately 4.92 hectares (ha) across the administration boundaries of both DDC and TDC. It comprises 1.22ha for the Peaking Plant Facility and 3.7ha for the Internal Road Network and Landscaping.

The Peaking Plant Facility Site is bounded by the UK Power Networks substation to the north, a 15 metre (m) strip of grassland to the east beyond which is the A256 Ramsgate to Sandwich Road, part of a 8ha site with planning permission for construction of a Materials Recycling Facility (MRF) (Ref: DO/10/954) to the south, and the River Stour to the west. The majority of the Peaking Plant Facility Site is located in DDC, although a part of the western site boundary lies in TDC. The Peaking Plant Facility Site is located at Ordnance Survey (OS) Grid Reference (NGR) TR329623 and is shown in Figure NTS-2.

The Internal Road Network and Landscaping Site is bounded by the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) to the north, the petrol filling station on the A256 and the road itself to the east, the Peaking Plant Facility Site to the south, and the River Stour to the west. It excludes the former turbine hall and UK Power Networks substation. The majority of the Internal Road Network and Landscaping Site is located in TDC, although a part of the south eastern site boundary is in DDC, as shown in Figure NTS-3a and NTS-3b.

Given the scale of development, the location of the site and the potential for significant environmental effects, the Applicant appointed URS Infrastructure & Environment UK Limited (URS) to undertake an Environmental Impact Assessment (EIA) in line with the Town and Country (EIA) Regulations 2011 and prepare an ES, which is submitted along with the planning applications.

This document provides a Non-Technical Summary (NTS) of the ES and provides an overview of the findings of the EIA.

2. Assessment Methodology and Approach

2.1 The EIA Process

The potential environmental impacts of the Proposed Development have been assessed systematically through the EIA process. The results of the EIA are presented in full within the ES. The ES is designed to inform readers of the nature of the Proposed Development, the likely environmental impacts and the measures proposed to eliminate, reduce or mitigate any significant adverse impacts on the environment. The ES describes the environmental impacts of the Proposed Development during the construction phase, and on completion and operation of the Proposed Development.
Figure NTS-1: Location of the Proposed Development Site
The ES consists of:

- **Volume I: Main ES**: this document forms the main body of the ES, detailing the results of environmental investigations, impacts arising and proposed mitigation measures. The ES also includes details of the Proposed Development;

- **Volume II: Technical Appendices**: comprises survey data, technical reports and background information supporting the assessments and conclusions given within the main ES; and

- **Non-Technical Summary** (this document): summarises the key findings of the ES in non-technical language.

The significance of impacts has been evaluated with reference to specific standards, accepted criteria and legislation where available. Where it has not been possible to quantify impacts, qualitative assessments have been carried out, based on professional judgement. Impacts have been classified as being adverse or beneficial in significance. In addition to the significance, the magnitude of impacts is also assessed. Impacts are expressed on a scale using the terms negligible (imperceptible), minor, moderate or major. Impacts are also assigned a geographic extent (local, regional or national) and duration (temporary/short-term or long-term). In addition, the ES identifies the potential for impact interactions and cumulative impacts.

Where there are adverse impacts, mitigation measures have been identified to eliminate, mitigate or reduce those impacts. Where mitigation measures have been identified, these measures have been incorporated into either the design of the Proposed Development; translated into construction commitments; or operational or managerial standards/procedures. The ES highlights the ‘residual’ impacts which remain following the implementation of suitable mitigation measures, and classifies these in accordance with the impact significance criteria terminology given above.

In order to assess the potential impacts of the Proposed Development, the existing conditions of and around the site (known as ‘baseline conditions’) have been determined and considered. For the purposes of the EIA, the baseline conditions have been taken as the environmental and socio-economic conditions that currently exist on the site and of the surrounding area.

This ES has been drafted in a clear manner that allows both Councils to assess the merits of the two individual applications, as well as assessing their cumulative impacts, in accordance with the EIA Regulations.

### 2.2 EIA Scoping and Consultation

Consultation is important to the development of a balanced ES. Views of statutory and non-statutory consultees serve to focus the studies and identify issues which require further investigation. Over the course of the design and EIA process, a number of consultees have been consulted including Kent County Council (KCC), DDC, TDC, English Heritage, the Environment Agency, Natural England, the Highways Agency, Kent Wildlife Trust, the Royal Society for the Protection of Birds (RSPB) and members of the public, amongst others.

As part of the EIA process, the Applicant submitted an EIA Scoping Report to DDC and TDC on the 7th September 2012. Scoping forms one of the first stages of the EIA process and it is through EIA Scoping that DDC and TDC and other consultees are consulted on the scope of the EIA. DDC and TDC issued a formal EIA Scoping Opinion, taking into account the comments from these other organisations, in mid/end October 2012. The EIA Scoping Opinion has been taken into account throughout the EIA process and during the preparation of the ES.

### 3. Planning Policy Context

The EIA has been undertaken and the ES prepared with regards to relevant national, regional and local planning policy. At the national level, the key planning policy document is the National Planning Policy Framework (NPPF) (2012) which broadly sets out the Government’s vision of sustainable development, which is to be interpreted and applied locally to meet local development aspirations.

The Proposed Development Site straddles the administrative boundaries of both DDC and TDC. Whilst DDC are the determining authority for the Peaking Plant Facility application, TDC will determine the Internal Road Network and Landscaping proposals.
4. The Site Context

The Proposed Development Site forms part of the former Richborough Power Station, and was used for generating power for over 40 years, before decommissioning took place in early 2000.

The wider former Richborough Power Station site has been cleared of all former buildings and all structures except for the former gatehouse and the frame of the turbine hall.

The gatehouse is currently used as a site office for security staff, whilst National Grid has aspirations to reuse the turbine hall as part of its proposed interconnector with Belgium (this forms a separate planning application and is not related to this EIA).

Areas of hardstanding remain as part of the ongoing maintenance of this area, along with aggregate from the demolished buildings which will be used in the construction of the Proposed Development.

The surrounding area around the Proposed Development Site is characterised by a mix of residential, agricultural, industrial and commercial development. The closest residential dwelling to the site is located approximately 600m away to the north, whilst to the east of the site there is an industrial park located approximately 200m away.

There are two nearby petrol stations located approximately 100m north of the site entrance along the A256, whilst a private footbridge runs over the River Stour towards the south of the site.

Other potential sensitive receptors have been identified within 2km of the Proposed Development Site based on a review of secondary data, field surveys, and consultations. These include the following:

- Ash Level and South Richborough Pasture Woods Local Wildlife Site (LWS), which is located on the opposite side of the River Stour from the site;
- Woods and Minsters Grassland Marshes LWS, which is located partly within the north western part of the Proposed Development Site;
- Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI), which is situated immediately north and west of the Proposed Development Site;
- Thanet Coast Special Area of Conservation (SAC), and Sandwich Bay SAC, and Sandwich and Pegwell Bay National Nature Reserve (NNR), which are approximately 600m east of the Site at their nearest point;
- Non-statutory nature conservation sites;
- Roman Fort and Amphitheatre, which is approximately 1.5km south of the Site, and other sub-surface archaeological resources and utilities;
- Ecological receptors (bats and breeding birds);
- Pedestrians, cyclists and road users; and
- Key short, medium and long-distance views.

5. Key Features of the Proposed Development

The Proposed Development will be a Peaking Plant Facility with an electrical output of up to 42.4 megawatts (MW) and Internal Road Network with structural and estate landscaping. The 4.92ha Application Site comprises of 1.22ha (2.80 acres) for the Peaking Plant Facility and 3.7ha (6.4 acres) for the Internal Road Network and Landscaping.

A peaking plant facility is a back-up power station that is designed to provide top-up supply to the national grid at short notice, for example during periods of high electricity demand (i.e. peak demand) or shortfalls of electricity supply (e.g. to prevent blackouts).

It is anticipated that the proposed Peaking Plant Facility will operate when requested by the National Grid for a cumulative total of up to 720 hours a year (30 days equivalent spread throughout the year according to demand). Operation of the Peaking Plant Facility will theoretically be any time of day; however experience dictates that periods of high demand or shortfall in generation will be during the morning or evening peak hours.

The Peaking Plant Facility will comprise of 53 diesel powered generators housed in individual standard metal containers, approximately 6m in length, 2.4m wide and 2.6m height. All container generators will be designed to provide industry-leading sound attenuation levels.

The generators will be equipped with a small fuel tank inside each container, with each pack of three generators also connected to its own individual fuel tank (18 fuel tanks in total), which is located outside...
the containers and above ground. The generators will be connected to one of four chimneys on the site, which will be approximately 35m high and 1.3m diameter.

The generator compound will have a central area of 0.73ha which will include three containers housing electrical equipment, office storage and welfare space. The generator compound will be surrounded by an area of 0.4ha which will accommodate a 3m high noise barrier, and the site boundary will be encircled by a 4m high security fence.

A landscaping strategy has been developed in order to screen the Proposed Development as far as practicable, together with providing ecological habitat. The proposed layout of the Peaking Plant Facility is presented in Figure NTS-2.

The application for the Internal Road Network and Landscaping comprises a road surface suitable for heavy goods vehicle (HGV) traffic to move around the Site, a weighbridge, and structural/estate landscaping around the perimeter of the Site to shield views into the Site and offer potential flood attenuation. Also included will be provision for serving the development including allowances for utilities and lighting.

The Internal Road Network and Landscaping application consists predominantly of an upgrade to the current road network that is already on site. The layout of the proposed Internal Road Network and Landscaping is presented in Figure NTS-3a and 3b.

The proposed Internal Road Network will deviate slightly from the existing layout with the road in the north west corner moving closer to the River Stour than it is at present. The proposed layout will reduce the width between the road and the river from 15m to 3m, and a landscaping strategy has been developed to offset this change.

Access to the Internal Road Network will be via the existing former Richborough Power Station entrance from the roundabout on Ramsgate Road (A256). This access has been improved to contemporary highway standards by work undertaken in 2011.

A circulation plan has been developed for the Internal Road Network and includes a part two-way, part one-way circulation system for the site. Key points to note include:

- The two-way section will be located along the boundary of the River Stour and consists of part of the western ‘Riverside Road’, as well as along the north western corridor. It will consist of a 7.3m carriageway with a 1.2m footway. The footway abuts the riverside wall and will retain the river wall.

- The one-way system will be used along the north eastern loop of the Internal Road Network (which will provide dedicated access for the National Grid operations), as well as along the southern loop as it passes the proposed Peaking Plant Facility and the existing UK Power Networks substation to return to the roundabout. The road will be 5m wide with a 1.2m wide footway. This will still provide adequate space for overtaking for emergencies or at time of vehicle breakdown when vehicles need to pass.

The road lighting will comprise of low level illuminated bollard lighting approximately 1m high, which is sympathetic to local ecological considerations such as bats. In addition the back portion of the bollards situated along the western ‘riverside’ boundary of the site will be obscured to minimise light spill onto this habitat. It is anticipated that full street lighting will not be required for the Internal Road Network.

A landscaping strategy has been developed for both the Internal Road Network and the Peaking Plant Facility in order to screen the development as far as practicable, together with providing ecological habitat and drainage attenuation.
Figure NTS-3b: Proposed Layout of the Internal Road Network and Landscaping (northwest spur road)
6. Assessment of Alternatives

Under the EIA Regulations, an ES is required to provide “an outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects”. Alternatives analysis is a key part of the EIA process and serves to ensure that environmental considerations are built into the project design at the earliest possible stage. The ES considers the ‘do nothing option’; ‘alternative sites’; and ‘alternative designs and design evolution.’

For the ‘do nothing’ option, the site would remain in its current state. The Proposed Development Site is currently environmentally ‘neutral’, and there is no active pollution of the environment, nor is there any contribution to environmental benefits.

The ‘do nothing’ option would prevent subsequent redevelopment and future opportunities for the site. As mentioned, the Proposed Development Site presents a major opportunity for brownfield redevelopment and therefore this option would result in a range of negative impacts, including under utilisation of the current site and the loss of the opportunity to deliver a vital service to the national grid.

‘Alternative sites’ have not been considered by the Applicant as the Development Proposals have been designed as a direct response to the specific site’s potential as recognised by KCC in the Site Allocations Document (2007) and Kent Waste Local Plan (1998).

Richborough is well suited for a peaking plant facility due to its previous power generation use and the proximity to Thanet offshore wind farm. Ofgem and the National Grid have both identified the need for back up power generation to secure the UK’s energy supply.

A series of alternative fuel types and designs were considered before diesel was chosen as the preferred option. A natural gas connection was deemed uneconomical for the limited operational requirement of the Peaking Plant Facility, plus the ability to store the diesel onsite guarantees a fuel supply to the development.

Combined Heat and Power (CHP) generation was deemed unsuitable for the site due to a series of constraints posed by both the Proposed Development’s limited operating hours, as well as the site’s location.

Environmental factors have been a primary concern when considering alternative designs and the design evolution of the Proposed Development. For instance, the design of the Peaking Plant Facility has evolved and now includes a reduced number of chimney flues but with an increased height to reduce air pollution, whilst acoustic fencing has been incorporated around the whole site to reduce the impacts of noise.

7. Construction

It is anticipated that the construction works of the Peaking Plant Facility would take approximately 13 weeks and Internal Road Network and Landscaping an estimated 18 weeks.

It is anticipated that construction works for the Proposed Development will start in late 2013, with an expected operational start date of mid 2014.

It is anticipated that the core working hours for construction will be set out as follows (though this will be subject to agreement with TDC and DDC):

- 08:00 – 18:00 hours Weekdays;
- 08:00 – 13:00 hours Saturday; and
- Working on Sundays and Bank Holidays will be subject to reasonable notice.

These hours may be subject to variation by agreement depending on the activity and time of year.

The Applicant is committed to good environmental management throughout the construction phase of the Proposed Development. The Applicant will appoint a Principal Contractor for construction works who will develop and implement a Construction Method Statement, through which mitigation and compliance with The Construction (Design and Management) Regulations (2007) will be achieved. This will ensure that contractors carry out their operations in a safe and considerate manner, with due regard to passing pedestrians and road users.

In addition, an Environmental Management Plan (EMP) will be produced, which will include roles and responsibilities, detail on control measures and activities to be undertaken to minimise environmental impact, and monitoring and record-keeping requirements. A commitment will be made to periodically review the EMP and undertake regular environmental audits of its implementation.
during the construction phase of the Proposed Development.

A key aspect of the successful management of the project will be the maintenance of good relations with site neighbours and the general public. The Applicant has already engaged in consultation with a broad range of stakeholders and this will continue through the various phases of the project.

8. Potential Environmental Impacts

8.1 Socio-Economics

Chapter 6: Socio-Economics of the ES (Volume I) presents an analysis of the socio-economic impacts of the Proposed Development.

The assessment focuses on:

- Employment arising as a result of the Proposed Development during the construction and operational phases;
- Broader social, economic and community impacts of the Proposed Development, specifically in relation to tourism; and
- Contribution of the Proposed Development to meeting ‘Regional Renewable Energy Targets’.

The baseline socio-economic conditions are established based on a review of available data sources such as 2001 Census data and consider the existing site, population, skills and education, labour force and employment, occupational profile and tourism.

Impacts and Mitigation

Construction Phase

The construction phase of the Peaking Plant Facility is estimated to lead to 7 engineering jobs on site and 2 lorry drivers.

For the Internal Road Network and Landscaping, the minimum number of construction jobs has been estimated to be 51 gross jobs over the 18-week construction phase, including 31 on-site workers and an estimate of 20 lorry drivers.

Although these employment opportunities will make a contribution towards economic growth, when considered within the context of the size of the local and regional labour force, it is judged that neither the construction of the Peaking Plant Facility or the construction of the Internal Road Network and Landscaping will result in more than a negligible effect on the local Dover and Thanet and wider South East economies.

Completed Development

During the operational phase, the Peaking Plant Facility will require an estimated requirement of just one full time engineer on site. The Internal Road Network or Landscaping will require no permanent operational staff.

It is therefore assessed that the Proposed Development will have a negligible impact on the local Dover and Thanet, and wider South East economies.

Tourism in the Construction and Operational Phases

The Richborough Roman Fort and the Saxon Shoreway are located approximately 1.5km from the Site and are considered popular tourist destinations.

Given the short duration of the construction phase, visits to Richborough Roman Fort are unlikely to be significantly affected. The Proposed Development is not considered likely to have a significant adverse effect on tourism at such sites during either the construction or operational phases.

Taking these considerations into account, the impact of the Proposed Development on tourism in the local area is assessed to be negligible.

Contribution to Regional Renewable Energy Targets in the Operational Phase

Although the Proposed Development will not directly contribute to meeting regional renewable energy targets, it will provide a support mechanism for existing and future renewable energy technologies which may not operate during periods of low wind, or sunlight. The Peaking Plant Facility is designed to ‘top up’ supply during such periods of low productivity and/or high demand.

On this basis it is assessed that the scheme will have a minor beneficial, long-term impact on meeting regional renewable energy targets.

Conclusions

The Proposed Development would have a short-term minor beneficial effect on renewable energy targets.

The long term operational phase of the Proposed Development will not provide significant additional employment to the local area, and will have no additional effect on the local or regional economies, although it will help contribute to meeting renewable
energy targets within the South East, and overall has been concluded as being of **negligible** significance.

### 8.2 Transport

*Chapter 7: Transportation and Access* of the ES (Volume I) provides an assessment of the transport and access related effects of the Peaking Plant Facility and Internal Road Network and Landscaping.

The assessment focuses on trip generation and the potential impacts of the Proposed Development on all transport modes. Changes to highway traffic volumes, flows and capacity and the impacts on public transport accessibility and capacity are addressed, together with consideration of the temporary impacts arising from construction activities.

**Impacts and Mitigation**

**Construction Phase**

The construction process for the Peaking Plant Facility is fairly simplistic, with each of the 53 diesel generators being delivered to the site as a self-contained unit on the back of an articulated container lorry. In addition to the generator units there is also the need for some supplementary pieces of equipment such as flues. The quantum of these items is minimal and will be delivered on a relatively low number of HGVs.

For the Internal Road Network much of the construction will use arisings already on-site from the previous demolition of the chimney and cooling towers. It is anticipated that the largest volume of HGV movements due to construction will be associated with the delivery of tarmac. The surfacing processes are likely to be undertaken over a 4 week period and will generate approximately 20 HGV deliveries per day.

Together, the construction phase of the Peaking Plant Facility and the Internal Road Network and Landscaping is expected to lead to a worst case (and probably unrealistic) trip generation of up to 60 HGV movements per day. This corresponds to an average 5 HGV deliveries (and departures) per hour during working hours, which is not deemed to be significant in terms of an increase in daily traffic flows along the existing road network.

The construction traffic impacts of the Proposed Development are expected to have a **negligible** impact upon the transport related aspects of the local area.

**Completed Development**

Operational access to the Proposed Development Site will be through an access road off the roundabout which leads round the perimeter of the site. The on-site infrastructure consists of a series of one and two way roads; there is sufficient width on all the two-way sections for 2 HGV’s to pass and the one-way sections have adequate width with reinforced footways for a HGV to pass a broken down vehicle if necessary.

As a worst case scenario the Peaking Plant Facility will increase the number of heavy goods vehicles on the surrounding road network by a maximum of 2 trips per hour, or approximately 20 trips per day. This is considered to have a **negligible** effect upon the increase in traffic flow, severance, accidents and safety, and fear and intimidation.

It is not anticipated that the Internal Road Network will in itself lead to any traffic during operation. The impact is therefore considered **negligible**.

Taking these considerations into account, the operational traffic impacts of the Proposed Development is expected to have a **negligible** impact upon the transport related aspects of the local area.

**Conclusions**

The Proposed Development is expected to result in less than a 1% impact on traffic flows. As such, the Proposed Development would have a **negligible** effect upon the transport related aspects of the local area.

The Proposed Development is also expected to have a **negligible** impact on the increase in traffic flow, severance, accidents and safety, and fear and intimidation, both during construction and operation.

### 8.3 Air Quality

*Chapter 8: Air Quality* (Volume I) of the ES provides an assessment of the potential impacts on local air quality from the construction and operation of the Proposed Development.

The assessment focuses on pollutants known or suspected to have deleterious effects upon human health, and those pollutants where historically relatively high concentrations have been recorded within and downwind of urban areas.
In order to determine baseline air quality conditions on and offsite and assess the predicted impact associated with the Proposed Development an air quality study has been undertaken using a computer model.

Baseline air quality data has been determined through a review of local air quality management reports and the national air quality archive.

DCC and TDC have not designated any Air Quality Management Areas within a 4km radius of the Proposed Development Site.

Impacts and Mitigation

Construction Phase

The worst case (and probably unrealistic) trip generation of up to 80 HGV movements per day is not deemed to be significant in terms of an increase in daily traffic flows along the existing road network. Exhaust emissions from road vehicles are therefore expected to have a negligible impact on the local air quality.

The impacts of exhaust emissions from construction plant will typically reduce to negligible within 15-20m of a site boundary. The nearest residential receptor is located over 600m from the site and is therefore expected to experience a negligible effect.

Dust generated from the demolition and construction activities is expected to be of negligible significance.

It is considered unlikely that the guidance limits for the deposition of dust on vegetation and ecosystems would be exceeded during the construction of the Proposed Development. The impact on adjacent habitats is considered negligible.

A number of mitigation measures will be implemented as part of the Environmental Management Plan including the regular maintenance of vehicle engines, the use of catalytic converters and minimisation of dust generating activities.

Completed Development

There will be relatively few road trips during operation compared with the existing traffic flows on the local road network, as discussed above. Exhaust emissions from road vehicles are therefore expected to have a negligible impact on the local air quality.

The impacts associated with the Peaking Plant emissions on nearby properties and the surrounding habitat sites have been assessed using a detailed dispersion model and shown to lead to a negligible impact. This takes into accounts the 35m high stacks, which have been designed to avoid significant impacts on local receptors, and a commitment by the developer to achieve rigorous emissions limits for the key pollutant, oxides of nitrogen.

Conclusions

The impacts associated with site plant emissions, construction dust generation and traffic emissions during the construction phase of the Proposed Development are predicted to be negligible.

The impacts associated with the operational traffic and Peaking Plant Facility emissions on nearby properties and the surrounding habitat sites are also considered negligible.

8.4 Noise and Vibration

Chapter 9: Noise and Vibration of the ES (Volume I) presents an assessment of the likely significant impacts of the Proposed Development with respect to noise and vibration to identified sensitive receptors, in terms of:

- Predicted noise and vibration levels from the construction works;
- Noise from the Peaking Plant Facility during operation; and
- Any increases to road traffic attributed to the Proposed Development.

The noise and vibration impact assessment is supported by a series of noise surveys. The assessment considers the suitability of the Proposed Development for the proposed uses, in terms of existing noise and vibration.

Potential sensitive receptors in proximity to the site which are taken into consideration when assessing the impacts include:

- Residential dwellings along Ebbsfleet Lane (nearest property 300m from the Proposed Development); and
- Residential dwellings along Ramsgate Road (nearest property 1km from the Proposed Development).

It was noted during the baseline survey that the noise environment is dominated by traffic noise from
the A256. Additional noise sources included small aircraft (micro-lights) regularly flying over the area.

Impacts and Mitigation

Construction Phase

Noise and vibration impacts from the construction stage including construction traffic are predicted to be of negligible significance.

Construction noise and vibration will be managed to reduce impacts and mitigation measures where appropriate will be documented in the Environmental Management Plan. Examples of mitigation include but are not limited to: use of modern, quiet and well maintained equipment; use of low impact techniques; use of electrically powered equipment run from the mains supply; and careful planning of the sequence of works in order to minimise the transfer of noise or vibration to neighbours.

Completed Development

Noise and vibration impacts from the operational stage of the Proposed Development including operational traffic are predicted to be of no greater than minor adverse significance and reducing to negligible away from the nearest receptors.

The following operational noise mitigation has been included to ensure that noise emissions from the site meet the operational noise limits at the receptors and do not breach any of the design criteria:

- Generators will be bespoke units. Each of the units will be fitted with silencers. The silencers will be designed to remove any tonal acoustic features from the generators. The acoustic performance of the bespoke unit will be tested before they are installed on site; and
- A 3m high acoustic barrier which will surround the site.

Conclusions

The residual impacts associated with noise and vibration from the construction and operation of the Proposed Development following implementation of the mitigation measures are negligible.

8.5 Ground Conditions

Chapter 10: Ground Conditions of the ES (Volume I) addresses the impact of the Proposed Development on the existing ground conditions, geology and hydrogeology of the site and surrounding area.

The assessment identifies the potential sources of contamination on the site and in the surrounding area; the pathways that the contamination sources could take to create an impact; and the receptors that could be affected by the existing contamination sources.

A number of existing receptors to soil contamination and groundwater have been identified. These include, but are not limited to, the Secondary-A Aquifer associated with the Thanet Beds, site and construction personnel (human health receptors), the River Stour and the Proposed Development’s end users.

Impacts and Mitigation

Construction Phase

The majority of impacts related to ground conditions during the construction of the Proposed Development can be mitigated to an acceptable level of significance through industry recognised standards and best practice measures which will be managed through the Environmental Management Plan, Construction Method Statement and Site Waste Management Plan.

During construction, there is the potential that site workers could be exposed to risks onsite. Mitigation measures such as screening for unexploded ordnance, implementation of associated watching briefs and assessments for the potential for ground gas during intrusive site investigation work will be undertaken to keep the level of risk within acceptable limits (i.e. negligible).

Completed Development

The proposed Peaking Plant Facility will store diesel onsite for fuel and will also require the use of various lubricating oils. Without mitigation measures the potential risk posed to soils and groundwater from these products is considered to be a moderate long term adverse impact to human health and controlled waters. Suitable mitigation measures will therefore be taken to protect controlled waters from the release of diesel and oils, in line with Environment Agency requirements. These measures will comprise the following:

- Diesel will be stored in tanks designed, with measures to prevent leakage, and will be sited away from surface water drains, on an
impermeable base with an impermeable bund that of adequate capacity to contain 110% of the contents;

- The appropriate utility company will be consulted on the potential requirement for an oil interceptor at the point where site surface water runoff enters the combined sewer;
- An emergency spillage action plan will be produced. On-site provisions will be made to contain a serious spill or leak;
- Site security will be such to prevent vandalism and deliberate release of contaminants to soil and groundwater.

With these mitigation measures in place the risk to soil and groundwater is considered minor adverse.

The Peaking Plant Facility will be constructed with suitably designed footings, base slab or foundations to ensure that the long-term settlement of the plant will occur within acceptable limits. Therefore, impacts from potential ground movements are considered to be negligible.

The potential contamination from the operation of the proposed Internal Road Network and Landscaping would be from fuel spills from vehicles, particularly following a road traffic accident (though this is unlikely). Mitigation measures will include restrictive speed limits, warning signage and driver safety training. Implementation of the mitigation methods are expected to result in a negligible impact to sensitive receptors.

**Conclusions**

The residual impact of the Proposed Development on ground conditions is considered to be minor adverse due to the risk associated with diesel storage onsite during operation. The impact associated with construction is considered negligible.

**8.6 Water Resources and Flood Risk**

*Chapter 11: Water Resources and Flood Risk* of the ES (Volume I) presents an assessment of the impact of the Proposed Development on water resources, drainage and surface water run-off and flood risk associated with the construction and operation of the Proposed Development.

The River Stour discharges into Pegwell Bay at a point approximately 1.3km northeast of the site. The River Stour water quality can be described as medium importance.

The Proposed Development Site is within the Water Resource Zone (WRZ) of Kent Thanet. The only surface water source in the Kent Thanet WRZ is on the River Stour. The Southern Water Services Limited (SWUL) water supply network is considered to be of very high importance for the supply of water locally and regionally.

The site lies mainly within the Flood Zone 1 (land assessed as having a less than 1 in 1000 annual probability of river or sea flooding) and partially within the Flood Zone 2 (land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding or between a 1 in 200 and 1 in 1000 annual probability of sea flooding in any year).

The River Stour defences along this section of the river provide a standard of protection of in excess of 1 in 100 years return period flood events (i.e. defences protect against a tidal flooding event that has a 1% annual probability of occurring). The area of the Proposed Development Site that does flood in a 1 in 1000 year return period event does not extend to the Peaking Plant Facility Site area or the main entrance access road to the site from the A256 highway.

The present risk of flooding from fluvial (i.e. resulting from rainfall or snow and ice melt within catchment areas) and tidal events at the Proposed Development Site is low.

The Site does not lie within a designated groundwater Source Protection Zone for water abstraction, though does overly an aquifer (aquifers are capable of supporting water supplies at a local rather than strategic scale, and in some cases form an important source of base flow to rivers). The shallow aquifer is considered to be of low importance. The deep aquifer in the Lambeth group is considered to be of high importance with regard to industrial and private water supply.

There are no licensed groundwater abstractions used for public supply within 2km of the site.

**Impacts and Mitigation**

**Construction Phase**

Impacts could arise from construction activities associated with the Proposed Development, including: increase in suspended sediments, spills and leaks of oils and hydrocarbons and concrete and cement products, disturbance of groundwater, disturbance of contaminated land, disturbance of
existing drainage systems, and increase in water supply and wastewater generation.

The assessment indicates that the application of mitigation measures (that form part of standard practice operational guidelines and which apply control at the source or along the pathway of the pollution) means that no significant impacts to water resources are expected through the construction phase of the Proposed Development. However, the residual impact of wastewater generation is anticipated to be of minor adverse significance for a temporary duration.

**Completed Development**

Impacts could arise from the operational phase of the Proposed Development, including: pollution arising from site users; physical disturbance of aquifers and groundwater flows; impacts on flood risk and drainage; water supply/demand; generation of wastewater; and contamination of the water environment from on-site materials.

The assessment indicates that the application of mitigation measures means that no significant impacts to water resources are expected through the operational phase of the Proposed Development. The completed operational development is expected to have a negligible impact.

**Conclusions**

No significant impacts to water resources are expected to occur throughout the construction phase and once the Proposed Development is operational, provided that the standard mitigation measures outlined in the Environmental Statement are followed.

8.7 Cultural Heritage and Archaeology

*Chapter 12: Cultural Heritage and Archaeology of the ES (Volume I)* assesses the impacts of the Proposed Development on the known or likely cultural heritage assets and their setting. The assessment has been undertaken in accordance with the standards specified by the Institute of Archaeologists Codes, Standards and Guidelines.

Cultural Heritage is generally divided into three key areas comprising: Archaeology, historic buildings; and historic landscapes.

Designated heritage assets within an inner study area of 500m and a 5km outer study area from the boundary of the Proposed Development (the Zone of Theoretical Visibility (ZTV)) have been identified. These cultural heritage assets are as follows:

- No designated heritage assets within the development boundary or within the inner study area.
- 14 Scheduled Monuments within or crossing the outer study area. The nearest is ‘A Saxon Shore fort, Roman port and associated remains at Richborough’ located approximately 1.5km to the south of the site boundary.
- 631 listed buildings with notable concentrations in the built-up areas of Ramsgate, Sandwich and Minster, although none are situated within the 5km study area located within the Stour valley. The closest listed building is Richborough Roman Fort (Grade 1 listed) located approximately 1.5km south west of the site.
- Five conservation areas: Ramsgate Conservation Area, Pegwell Conservation Area, Royal Esplanade Conservation Area and Minster Conservation Area (all TDC) and Sandwich (Walled Town) Conservation Area (DDC).
- One English Heritage Registered Park and Garden, The Salutation, Sandwich that is located approximately 3.6km to the south of the site.

Previous archaeological fieldwork has identified a total of 17 undesignated archaeological assets within the inner study area that comprise archaeological sites and findspots and historical features from documentary sources. The assets range from the prehistoric period through to the modern period (1901 and later). There are no recorded heritage assets within the development area and the site has been subject to some previous modern ground disturbance during the construction of Richborough Power Station.

The Proposed Development Site retains no historic time-depth or historic landscape features and adds little to the historic characteristics of the wider character area – the Wantsum and Lower Stour Marshes. It is noted that large-scale industrial buildings are a characteristic of the eastern parts of this character area including the former Richborough Power Station and the modern industrial developments built on the former Richborough Port and at Stonar. The demolition of
the cooling towers at Richborough has removed a substantial modern intrusion within the landscape, but the steel frame of the turbine hall emphasises the dominant modern industrial influence of the former power station on this part of the historic landscape character area.

**Impacts and Mitigation**

**Construction Phase**

The construction of the Peaking Plant Facility and the Internal Road Network and Landscaping will have a negligible impact on upper deposits associated with the silting up of the Wantsum Channel. These alluvial deposits have been proven to be contaminated with heavy metals and hydrocarbons, and deeper alluvial deposits will not be impacted. No mitigation measures are proposed due to contamination issues and the minimal impacts of the works.

Due to the industrial context of the site and surrounding area there will be negligible impacts on the setting of historic buildings during the construction phase.

**Completed Development**

Due to the flat landscape and its location close to the coast, the Proposed Development will be visible during its operation. Taking into account this existing landscape and the setting of the historic buildings, impacts from the scheme will be limited.

The Peaking Plant Facility will add four narrow, light grey coloured chimneys stacks. The proposed stacks will have an impact on the setting of the conservation areas of Pegwell, Royal Esplanade and Ramsgate as well as their listed buildings which have views towards the bay and coastline.

Mitigation has been incorporated into the detailed design. As such, the chimney stacks will be painted light grey to reduce their visual impact on the setting of historic buildings and the scheduled Roman Fort at Richborough. They will also be limited to 35m in height.

Due to the wider industrial landscape along the A256 and the presence of other modern chimney stacks, the impact on the setting of the majority of the listed buildings, scheduled monuments and conservation areas from the operation of the Proposed Development has been assessed negligible, with the exception of the Grade I listed Grange located in Ramsgate Conservation Area.

With regards to this historic building, the tower of the building was designed as a place to look out over the bay and for this reason the development will have a minor adverse impact on this heritage asset.

The operation of the Peaking Plant Facility will have no further impacts on buried archaeological remains, the setting of the scheduled Richborough Roman Fort, other scheduled monuments within the 5km study area, or the historic landscape. This is therefore considered a negligible impact and no further mitigation measures are proposed.

The operation of the Internal Road Network and Landscaping will have no impact on all designated and non-designated heritage assets or the historic landscape, and is considered to be of negligible significance. No mitigation measures are therefore proposed.

**Conclusions**

The construction and operation of the Proposed Development are predicted to have no impacts on the majority of the heritage assets within 5km of the development area, or the historic landscape. No mitigation measures are proposed and therefore there will be no residual impacts.

There will be a minimal impact on the scheduled Richborough Roman fort and the Grade I listed historic building known as the Grange, in Ramsgate Conservation Area, the effect on both these assets is assessed as minor adverse.

The impact on the significance of the identified assets as a whole is, therefore, considered negligible. In accordance with the National Planning Policy Framework this harm has been weighed against the public benefits of the scheme.

**8.8 Ecology**

Chapter 13: Ecology of the ES (Volume I) assesses the impacts of the Proposed Development on the known or likely ecological assets. In particular it focuses on the habitats that are rare, notable or protected species within and adjacent to the Proposed Development Site.

The assessment of ecology has been prepared through establishing the known baseline conditions and the potential for further discovery of ecological assets through field surveys and the review and collation of existing ecological information for the Proposed Development Site and land within 2km (5km for bats).
The ecological impact assessment will focus on those receptors which are of local value and above. However, species which have legal protection may require mitigating measures to prevent a breach of legislation even though their conservation status will not be impacted by the proposed scheme. Based on these criteria, the following receptors have been considered:

- Sandwich Bay and Hacklinge Marshes SSSI-county value;
- Ash Level and South Richborough Pasture LWS-local value;
- Trees - local value;
- River Stour - borough value; and
- Water voles - borough value.

**Impacts and Mitigation**

**Construction Phase**

A series of best practice mitigation measures will be implemented during construction. The outstanding potential impacts during this phase of works include habitat loss, habitat degradation and disturbance from noise and vibration. Whilst new and replacement habitats will be created though the landscaping strategy during this phase, it is likely that high levels of disturbance during construction will deter animals from using them until the operational phase.

There will be no loss or degradation of habitat at the Sandwich Bay and Hacklinge Marshes SSSI and it is unlikely that noise during the construction phase of the Peaking Plant Facility will cause disturbance to the site due to the distance. The impact on Sandwich Bay and Hacklinge Marshes SSSI is therefore predicted to be negligible.

Noise during the construction phase of the Internal Road Network may cause disturbance to migrating and wintering birds if undertaken between October and March in any given year. However, due to the size of the SSSI, it is predicted that only a small proportion of this site will be affected. It is likely that birds will be deterred from using the area of the SSSI immediately adjacent to the site boundary for the duration of the construction phase and return when works cease. The impact on the SSSI is therefore considered minor adverse and temporary in nature.

The Ash Level and South Richborough Pasture LWS is approximately 50m from the Proposed Development Site and separated from it by the River Stour. There will be no loss of habitats or habitat degradation at this site and it is unlikely that there will be any effects from disturbance by noise due to the distance of the Proposed Development Site from the works. The impact on Ash Level and South Richborough Pasture LWS is therefore predicted to be negligible.

The majority of existing trees onsite at the Peaking Plant Facility will be retained. Furthermore, additional trees will be planted during the construction phase for landscaping and screening. Whilst the Peaking Plant Facility Site is likely to be too disturbed for animals to use the trees during the construction phase these are likely to benefit wildlife during the operational phase. The impacts on trees during construction will be minor adverse, though temporary in nature.

Most of the trees within the Internal Road Network and Landscaping Site boundary will be removed during the construction phase. However, a number of new trees will be planted along the eastern site boundary during the construction phase for landscaping and screening. The new tree line will be enhanced by being under-planted with a native shrub layer. Furthermore, native fruit trees will be planted along the western site boundary and this will increase the species-diversity of the trees.

Whilst the Internal Road Network and Landscaping Site is likely to be too disturbed for animals to use the new tree planting during the construction phase, it is likely to benefit wildlife during the operation. The impact on trees is anticipated to be minor adverse, though temporary in nature.

The habitats along the River Stour may be disturbed by noise and vibration during the construction phase of the development and this may deter wildlife, such as birds from using the river during this time. The impacts of noise and disturbance will only affect a small section of the river and will last for an estimated four and a half months. The impact on the River Stour will be minor adverse and temporary.

There are no opportunities for water vole to create burrows on the eastern bank, adjacent to the Proposed Development Site because the bank is reinforced with concrete, however water voles may use the vegetation in this area for foraging and may experience some disturbance from noise during the
construction phase. Due to the small area of habitat which will be affected by noise and the temporal nature of the disturbance, the impacts on water voles are considered only minor adverse and temporary.

**Completed Development**

The Noise and Vibration assessment states that the noise created by the Peaking Plant Facility will be below levels considered to cause disturbance to waterbirds. The Peaking Plant Facility will also only be operational for an estimated 30 days per year. The impact on Sandwich Bay and Hacklinge Marshes SSSI is therefore predicted to be negligible.

The Air Quality assessment demonstrates that the atmospheric emissions and nitrogen deposition is expected to be negligible at the SSSI.

No impacts on Sandwich Bay and Hacklinge Marshes SSSI are predicted during operation of the Internal Road Network. This impact is therefore considered to be negligible.

It is unlikely that there will be any effects from disturbance by noise on Ash Level and South Richborough Pasture LWS due to the distance of this site from the Proposed Development Site. Due to the low level and infrequency of the noise generated, the impact is predicted to be negligible.

The landscape planting will mature during the operational phase of the Proposed Development Site and will benefit a range of wildlife. The inclusion of native shrubs and trees, including some fruiting trees will add diversity to the Proposed Development Site which will enhance the value of the retained trees by providing additional resources for the animals that use them. This impact on trees through planting is considered minor beneficial and permanent.

The impacts of noise level at the nearest point of the River Stour to the Peaking Plant Facility are not considered significant. Furthermore, the new shrub and tree planting along the eastern bank of the river will enhance the corridor for wildlife, including bats and birds. The impact on the River Stour is predicted to be negligible.

The landscape planting around the eastern bank of the river associated with the Internal Road Network is expected to enhance the wildlife corridor. The inclusion of areas of species-rich grassland will create a new habitat on the site and this will attract nectar and pollen eating invertebrates and the animals that feed on them, such as bats and birds. The impact on the River Stour of the Internal Road Network and Landscape planting is therefore anticipated to be minor beneficial and permanent.

A small area of habitat used by water voles will be affected by noise from the Peaking Plant Facility. However, due to the low level and infrequency of this noise, the impacts on water voles are predicted to be minor adverse and not significant.

**Conclusions**

A number of measures will be implemented to protect ecological receptors during the construction phase of the Proposed Development and these will be contained within the Environmental Management Plan.

The residual impacts following implementation of the mitigation measures include a number of negligible and minor adverse impacts on habitats and species during construction of the Proposed Development. The removal of some trees will be required and onsite noise and dust emissions will be generated. This is temporary however and should only last for the duration of the construction phase, which is expected to be up to 18 weeks.

The operational impacts are generally expected to be negligible or minor beneficial, with the exception of the minor adverse impact expected on water vole during the operation of the Peaking Plant Facility. This will be intermittent however, since the plant will operate a maximum 720 hours per year, and it is not judged to be significant.

The proposed planting of new trees on the Site is expected to lead to a minor beneficial impact, which would be permanent in nature. The landscape planting around the eastern bank of the river is also expected to enhance the wildlife corridor and is therefore also judged to be minor beneficial and permanent.

**8.9 Landscape and Visual**

*Chapter 14: Landscape and Visual* of the ES (Volume I) assesses the impacts of the Proposed Development upon landscape character and visual amenity within the study area.

The assessment is based on a thorough understanding of the baseline conditions developed through desk study and site visits. In addition, the following material has been collected and used as part of the assessment:
• A photographic record of the study area;
• Aerial photography;
• Ordnance Survey Digital mapping;
• Digital terrain data;
• Landscape Character Assessment data from Natural England and local authorities,
• Digital Geographical Information Systems (GIS) data; and
• Contextual geographical information.

The method of landscape and visual impact assessment adopted for the proposed Peaking Plant Facility and internal Road Network has been devised to address the specific impacts raised by a development of this scale and nature. The methodology draws upon the following established current best practice guidance:

• Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management and Assessment, 2002); and
• Landscape Character Assessment: Guidance for England and Scotland (Countryside Agency and SNH, 2002).

As part of the Landscape and Visual assessment a series of 8 photomontages have been used to illustrate the likely impact of the Proposed Development from a selection of viewpoints within the study area which have been used to inform the assessment. The photomontages have been produced by David Lock Associates and follow a methodology which conforms to the Landscape Institute (LI) Advice Note 01/11.

Impacts and Mitigation

Construction Phase

The construction of the Peaking Plant Facility and Internal Road Network is predicted to result in a number of landscape impacts, including for example:

• Site clearance operations, including the removal of existing trees and scrub and existing earthworks;
• Removal of existing structures, materials and debris from the site;
• Establishment of temporary site compounds;
• Stockpiling of materials on the site; and
• Construction of temporary haulage roads across the site.

For the Peaking Plant Facility the majority of Landscape Character Areas (LCAs) assessed would experience negligible impacts during construction. Direct impacts would occur within a small area of The Sandwich Corridor LCA and the Richborough Castle LCA and these have been assessed as moderate adverse.

The construction of the proposed Peaking Plant Facility would result in moderate or moderate/major adverse impacts on the views of six local receptors which are considered significant. This is due in the most part to the proximity of these receptors to the construction site, and the elevation and the openness of the view where construction activities within the site would be visible. The construction period is anticipated to last for only 8 weeks however, and therefore these impacts are temporary in nature. The remaining receptors would experience minor adverse impacts on views but these are not considered significant.

For the Internal Road Network moderate adverse impacts would occur within a small area of the Sandwich Corridor LCA and the Former Wantsum Channel LCA. However, given the scale of the development in the context of the LCAs in which it sits. The remaining LCAs would experience minor or negligible Impacts.

In terms of visual amenity the construction of the Internal Road Network would require the removal of a limited amount of vegetation along the eastern and southern boundaries of the site, opening up views locally of the construction activities. Two visual receptors would experience moderate adverse Impacts; the remaining would experience minor adverse impacts, although these are not considered significant.

At the end of the construction programme for both the Peaking Plant Facility and the Internal Road Network, a landscape mitigation planting scheme would be implemented.

Completed Development

The Proposed Development includes new vegetation planting which will enhance the perimeter screening and habitat diversity.
The presence and prominence of the 35m high chimney stacks is considered to lead to moderate adverse impacts on the Sandwich Corridor LCA. Indirect Impacts on the character of the surrounding area would continue to result from intervisibility with the Proposed Development Site and in particular the proposed chimney stacks which would permanently alter the skyline locally. Sky-glow caused by the escape of light during operation after dark would cause minor adverse on character locally.

In terms of visual amenity, a total of 4 receptors would continue to experience moderate adverse impacts on views, which are considered significant. This is mainly a result of the receptors proximity to the Proposed Development and where the chimney stacks would break the skyline, appearing taller and more conspicuous than their context.

Three visual receptors would experience minor beneficial impacts, albeit not significant, as a result of the matured vegetation surrounding the site, providing screening and contrast to the industrial character of the neighbouring land-uses and the existing view of a derelict and vacant site.

During operation of the Internal Road Network, mitigation planting would begin to mature and would provide structure to the eastern boundary of the site in particular. There would continue to be moderate adverse impacts on the Sandwich Corridor LCA and the Former Wantsum Channel. The remaining areas are not expected to experience significant impacts.

Conclusions
The residual impacts following implementation of the mitigation measures include a number of moderate adverse impacts on landscape character and visual amenity during construction and operation. These would result where the proposed chimney stacks would appear prominent in views, breaking the skyline and drawing the eye. This includes LCAs where the character of the landscape is determined in part by its setting and distant views to the horizon, such as at Richborough Castle LCA.

The proposed landscape mitigation planting scheme is expected to lead to a minor beneficial impact on certain visual receptors, as a result of the matured vegetation surrounding the site, providing screening and contrast to the industrial character of the neighbouring land-uses and the existing view of a derelict and vacant site.

Figure NTS-4 and Figure NTS-5 show two of the photomontages taken as part of the Landscape and Visual Impact Assessment for the Proposed Development. Further photomontages are presented in Chapter 14: Landscape and Visual of the ES (Volume I).
Figure NTS-4: View of the Proposed Development looking North East from Richborough Fort
Figure NTS-5: View of the Proposed Development looking south from the A256 Ramsgate Road
9. Cumulative Impact Assessment

It is considered that the cumulative schemes with the greatest potential to lead to a cumulative impact with the Proposed Development are the proposed Materials Recycling Facility (MRF), Richborough Solar Farm and National Grid Interconnector. A tidal and local flood defence schemes have also been considered.

It is anticipated the construction period for the Proposed Development will be complete in advance of construction starting on the National Grid Interconnector development. However, it is not unusual for construction to take place on more than one site in close proximity to each other. The contractor will undertake regular liaison meetings and reviews with neighbouring sites to plan works so that they do not cause unnecessary disruption. In addition the developers of these schemes will also have mitigated for adverse impacts. Cumulative impacts during construction are therefore considered to be negligible.

It is not anticipated that the cumulative schemes would change the significance of the predicted residual impacts during operation of the Peaking Plant Facility and Internal Road Network and Landscaping, with the exception of the following three issues.

The significance of the impact on views from the Saxon Shore Way (viewpoint 18) would increase due to the length of exposure to views of a sequence of industrial buildings in the near distance from moderate/major adverse to major adverse during construction and the first year of operation, and to from moderate adverse to moderate/major adverse following 15 years of operation (taking into account the maturing of planted vegetation). This is due to the proximity of this walkway to the Proposed Development, Materials Recycling Facility (MRF), Richborough Solar Farm and the National Grid Interconnector, and inability to fully screen these developments from this location.

The National Grid Interconnector proposals will not directly emit pollutants to the atmosphere; however, the physical presence of this structure has the potential to affect dispersion. Cumulative impacts have been assessed as negligible for all pollutants with the exception of nitrogen dioxide emissions which are assessed as of minor adverse significance. This is a small change from negligible without the Interconnector.

Cumulative operational noise from the Peaking Plant Facility would also increase from negligible to minor adverse. Despite this, there are no significant cumulative impacts anticipated.

It is not expected that any other residual impacts attributed to the Proposed Development would change when taking into account these cumulative schemes.

10. Conclusions

The ES supports the two separate planning applications for the Peaking Plant Facility and the Internal Road Network and Landscaping and has been carried out in accordance with the EIA regulations.

The Proposed Development is considered to adhere with national, regional and local planning policy and would provide a support mechanism for the use of renewable energy technologies such as wind power and solar as part of an integrated system in the future Richborough Energy Park.