



Planning Supporting Statement

Proposed emissions management building, comprising of baghouse and stack at the BRM site in Northfleet, Gravesend, DA11 9BG

Britannia Refined Metals

Botany Road, Northfleet, Gravesend, DA11 9BG

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Basis of Report

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1.0 Introduction

This Planning Supporting Statement (PSS) has been prepared by SLR Consulting Ltd (SLR) ('the Agent') on behalf of Britannia Refined Metals (BRM) ('the Applicant') in support of a planning application being made to Gravesham Borough Council (GBC) for a proposed emission management building, comprising of a baghouse and stack, situated at Britannia Refined Metals, Botany Road, Northfleet, Gravesend, DA11 9BG. The emission management building would be ancillary to the operation of the Sample Preparation Building, which was deemed to be permitted development, by GBC in November 2023 (Ref.20230770).

1.1 Overview

This PSS comprises of the following section:

- Section 1.0 – Introduction/ Planning History (this section);
- Section 2.0 – Site Description and Surrounding Area;
- Section 3.0 – Description of Development;
- Section 4.0 – Planning Policy;
- Section 5.0 – Potential Environmental Effects and Summary of Mitigation Measures; and
- Section 6.0 – Summary and Conclusions.

1.2 The Applicant

Britannia Refined Metals ('the Applicant') is the largest primary lead producer in Europe and is involved in the refining of lead and silver, and the production of refined lead, lead alloys and silver from crude and scrap lead.

1.3 The Agent

SLR Consulting Ltd (SLR) is a multi-disciplinary environmental consultancy who provide a wide range of services including:

- Advisory, ESG & transactions;
- Engineering;
- Environmental Management, planning, and approvals;
- Environmental Specialist Services; and
- Land & Water.

In preparing this Planning Supporting Statement, SLR has drawn upon the expertise of our in-house technical teams to provide supporting services in connection with this planning application.

1.4 Background and Planning History

The planning history for the wider BRM Site is detailed in Table 1-1 and has been accessed via the Gravesham Borough Council public access planning portal¹.

¹ <https://plan.gravesham.gov.uk/online-applications/>



The site has a planning history dating back to the 1950s but only the most recent and relevant planning applications have been included in Table 1-1.

Table 1-1 - Relevant Planning History

Ref.	Description of Development	Decision Date	Decision
20170325	Installation an above ground, 1000 cubic meter capacity, cylindrical drainage water storage tank on the BRM site. The proposed location for the tank currently comprises three unused storage bays covered in a clad lean-to structure, adjacent to a larger operations building. The existing bays and structure will be demolished in order to provide sufficient space for the tank. The tank will be epoxy or glass fused steel material and will likely be green in colour. The tank will be supported on a reinforced concrete base which will be founded on existing piles. The tank will be 6m high and 17.5m diameter.	13/07/2017	Application Permitted
20211588	KCC/SCR/GR/0250/2021 - Retrospective Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 as to whether the proposed development of a facility to sample waste electronics material (also known as an E-Scrap facility) requires an Environmental Impact Assessment at Britannia Refined Metals (BRM) site	23/12/2021	Application Permitted
20221087	KCC Consultation - Development of an enclosed electronic waste (E-Scrap) transfer facility, involving shredding, sampling, sorting, and bulking up of electronic waste streams for onward transportation to recycling / management facilities. The proposed development includes construction of a new steel framed waste transfer building, firewater storage tank and associated plant, dust extraction unit, office and staff welfare building, new areas of concrete hard standing and footways, upgrade to site drainage, construction of a re-aligned access point off Manor Way and retention of vehicular access to the adjacent wharf	11/11/2022	Observations Sent
20230770	Application for Lawful Development Certificate for the proposed erection of a sample preparation plant building.	29/11/2023	Approved



2.0 Site Description and Surrounding Area

This section of the PSS provides a description of the application site (the Site) and its surrounding area.

2.1 Site Setting, Location, and Context

The Britannia Refined Metals site, outlined in blue in **Figure 2-1**, is situated to the south of the River Thames and to the north of Northfleet.

Figure 2-1 Site and Surrounding Area



To the west of the Site lies undeveloped marshland protected by an SSSI designation. To the southwest, the Site is bound by industrial warehouses within the Northfleet Industrial Park; other neighbouring companies include; sheet metal solutions; the London Bus Company; B & W Products; and Brett Aggregates & Brett Concrete.

The Site is accessed via Manor Way, which provides access to BRM and neighbouring industrial areas to the north. Manor Way, in turn, connects to Lower Road to the south, which then joins to the A226 which provides access to the wider national road network.

The area northeast of Manor Road is the working BRM metals recovery site, whilst the southwest includes an area of green space which is part of the wider Swanscombe Peninsula SSSI and under the ownership of the applicant.

Figure 2-2 depicts the Application Site Boundary in red, the further land ownership of the Applicant is edged in blue.



Figure 2-2 Blue and Red Line Boundaries



The Site lies entirely within the administrative boundary of GBC. Nearby settlements include Swanscombe (1.2km south) and Greenhithe (2.2km southeast). The A2 runs east to west at an approximate distance of 3km (south) connecting to the M25 (west).

The site lies within the National Character Area (NCA) 81, Greater Thames Estuary. This is characterised by the following:

- *Predominantly flat, low-lying coastal landscape where extensive open spaces are dominated by the sky, and the pervasive presence of water and numerous coastal estuaries extend the maritime influence far inland.*
- *Strong feelings of remoteness and wilderness persist on extensive salt marshes, mudflats and reclaimed farmed marshland, which support internationally important plants, invertebrates, and populations of breeding and overwintering birds.*
- *Open mosaic habitats on brownfield sites*
- *Highly urbanised areas within London and on marsh edges subject to chaotic activity of various major developments including ports, waste disposal, marine dredging, housing regeneration, mineral extraction, and prominent power stations plus numerous other industry-related activities.*

On a more localised level, the Site is also designated under Kent County Council's Landscape Character Assessment and falls within the Western Thames Marches, this is described as:

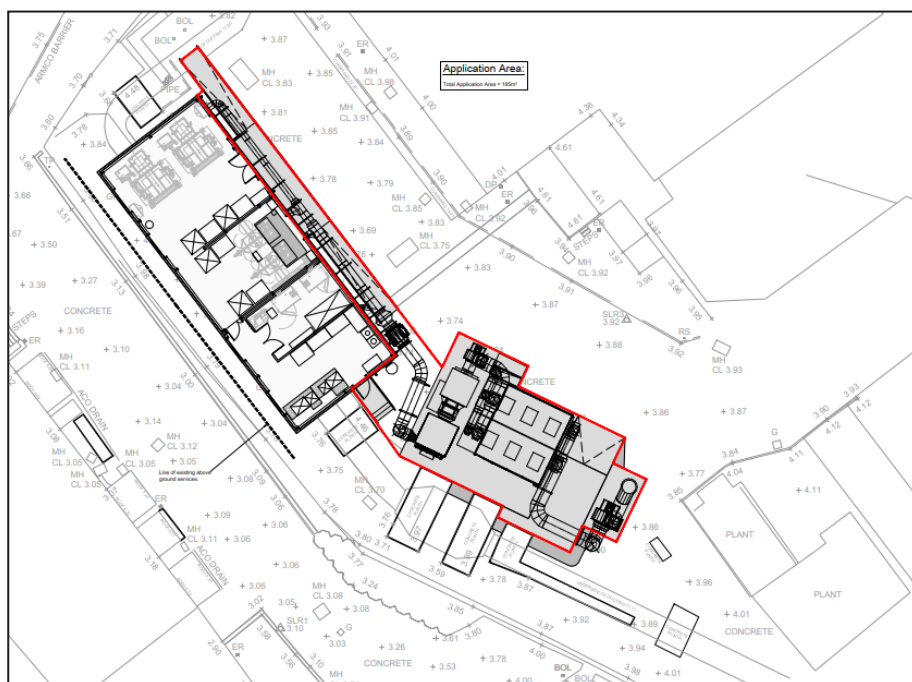
'Low-lying flat, open marshland adjacent to the River Thames that has become fragmented into isolated remnants by extensive urban and industrial development, creating a discordant character'.



2.2 The Application Site

Figure 2-3 presents the application site boundary, the total site area is 185m². The application area is situated within the south-western section of the wider BRM site and will be situated adjacent to the Sample Preparation building. The application area is situated close to the main site entrance on Manor Way and is surrounded by other industrial buildings within the confines of the BRM Site.

Figure 2-3 The Application Site



2.3 Designations and Constraints

2.3.1 Statutory Environmental Designations

Although the application site and wider BRM site are not subject to any statutory designations, the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) is situated directly to the west of the BRM site, as shown on **Figure 2-4**.

Within 5km of the Site, there are 8 SSSIs, these include:

- Gray's Thurrock Chalk Pit SSSI – approximately 2.7km north
- Globe Pit SSSI – approximately 2.6km northeast
- Hangman's Wood and Deneholes SSSI – approximately 3.8km northeast
- South Thames Estuary SSSI – approximately 5.9km east

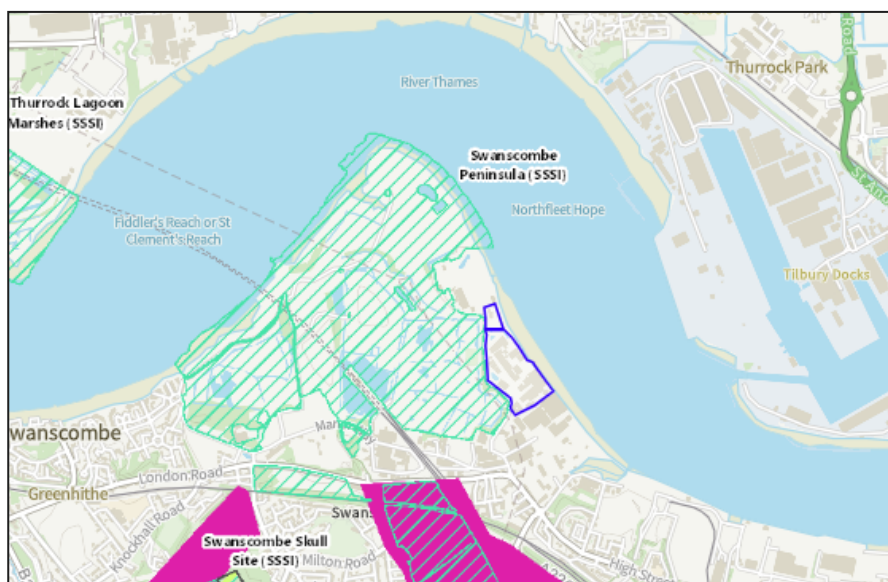
- Darenth Wood SSSI – approximately 3.8km southwest
- Swanscombe Skull Site SSSI – approximately 1.4km southwest
- West Thurrock Lagoon and Marches SSSI – approximately 2.7km northwest
- Purfleet Chalk Pits SSSI – approximately 5.4km northeast
- Lion Pit SSSI – approximately 2.6km northeast

There are no Local Nature Reserves (LNR) located within a 5km radius of the Site, however, there is the Swanscombe Skull National Nature Reserve situated approximately 1.4km to the southwest of the Site.

There are no Ramsar Sites located within a 5km radius of the Site, however the Thames Estuary and Marshes Ramsar is located approximately 6.1km to the east. There are no Special Protection Areas (SPA) within the 5km study radius of the Site, nor are there any Special Areas of Conservation (SAC). The closest SPA is the Thames Estuary and Marshes SPA which is situated approximately 6.1km to the east of the site.

There are no Ancient and Semi-Natural Woodlands located near to the Site, nor is the Site situated within one of the designated buffer zones. The nearest area of ancient woodland is situated 3km away from the site.

Figure 2-4 Statutory Designations



2.3.2 Archaeology and Cultural Heritage

Figure 2-5 presents the location of heritage assets in relation to the Site. Within a 5km radius of the Site there are

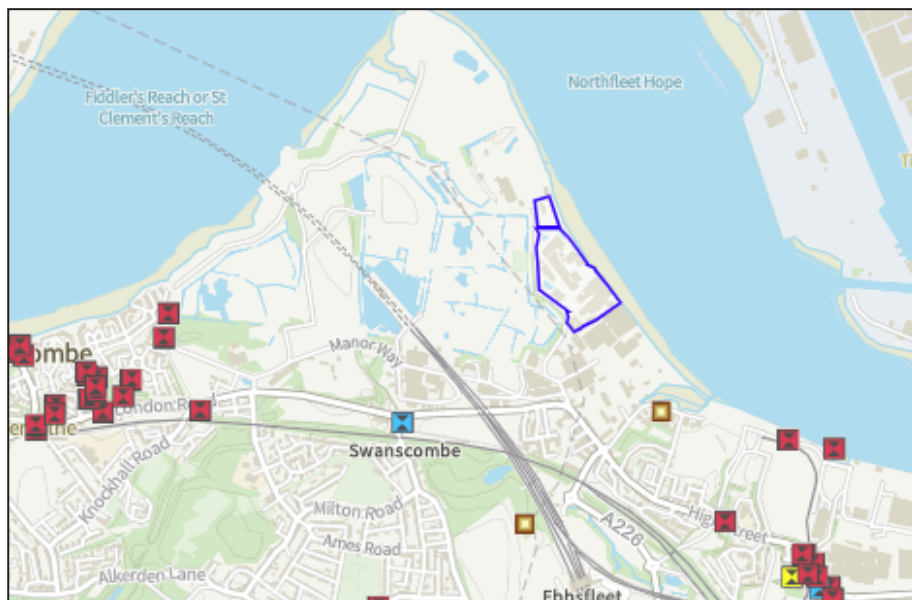
- 2 Grade I Listed buildings
- 50 + Grade II Listed buildings and 17 Grade II* Listed buildings.



There are two scheduled monuments within 1km of the site (shown as gold squares):

- Aspin's Kiln, ref. 1004227 – approximately 0.5km to the southeast from the site's southeastern boarder
- Palaeolithic Sites near Baker's Hole, ref 1003557 – approximately 0.7km to the south of the site

Figure 2-5 Location of Heritage Assets



2.3.3 Air Quality

The Site is entirely located within the Northfleet Industrial Area AQMA, which was declared in January 2002 due to Particulate Matter. There are 10 AQMAs within 5 km of the Site.

2.3.4 Water Environment

The Site lies within a Flood Zone Level 3, meaning that the area has a 1% or greater probability of flooding from rivers or 0.5% or greater probability of flooding from sea.

There are plans to increase the height of the seawall to the east of the Site in the future (Thames Estuary TE2100 Plan), this would potentially benefit the Site and decrease the risks of flooding.



3.0 Description of Development

The proposed emissions management building would consist of a baghouse and stack, situated adjacent to the Sample Preparation Building. The Sample Preparation Building will house furnaces, which require dust extraction, hence the need for the emissions management building and baghouse. The proposed building will lie to the north east of the Sample Preparation Building, as shown in **Figure 3-1**.

The footprint of the emissions management building would be 13.5m long by 8.1m wide, giving an area of 109m², excluding the vent which will link the emissions management building to the Sample Preparation Building.

Elevations are set out in Drawing 04.

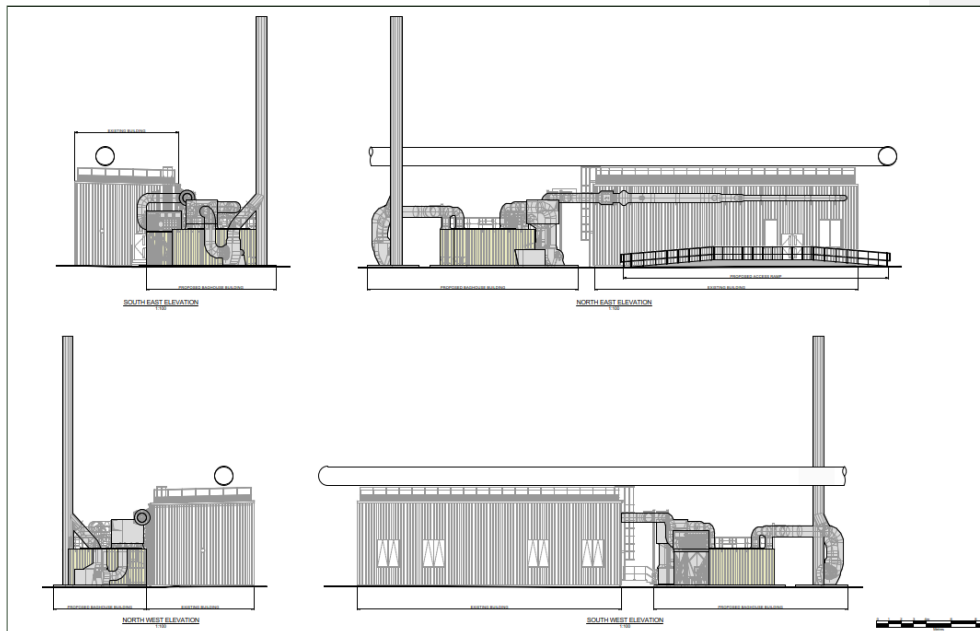
Figure 3-1 Sample Preparation Building and Baghouse - aerial view



Figure 3-2 below depicts the proposed emissions management building and stack and proposed elevations.



Figure 3-2 Proposed Sections and Elevations



3.1 Process Description

The E-scrap Sample Preparation Building will accommodate 4 furnaces and grinding/milling equipment associated with the furnaces to prepare the samples for analysis via a third party laboratory. The process emissions from the furnaces and equipment will need to be extracted via a ventilation system to an abatement unit, which is the emissions management building being applied for now. The abatement unit will include common dust extraction, high capacity dust pre-filters and a deep bed absorption unit that uses activated carbon to provide treatment of emissions prior to release via a dispersion stack (approx. 20m high). A 750 mm duct would link the Sample Preparation Building to the emissions management building.



4.0 Planning Policy

This section of the PSS provides a review of the key planning policies which have been considered when assessing the development proposal sought.

4.1 National Policy

4.1.1 The National Planning Policy Framework

The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and most recently amended on 19th December 2023. The NPPF sets out the government's latest planning policies for England and how these are expected to be applied.

The NPPF, is a key piece of legislation that all developments must comply with in order to be granted consent, the National Planning Policy Framework has built its core principles around sustainability, committing to, and contributing towards a sustainable development, '*meeting the needs of the present without comprising the ability of future generations to meet their own needs*'.

The following section of the NPPF are considered to be most relevant to the development:

- Section 2 – Achieving Sustainable Development;
- Section 6 – Building a Strong, Competitive Economy;
- Section 8 – Promoting Healthy and Safe Communities;
- Section 11 – Making Effective Use of Land
- Section 14 – Meeting the challenge of climate change, flooding, and coastal change; and
- Section 15 – Conserving and Enhancing the Natural Environment.

Section 2 – Achieving Sustainable Development

Section 2 of the NPPF relates to '*achieving sustainable development*', identifying in **paragraph 7** that "*the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without comprising the ability of future generations to meet their own needs*".

Paragraph 8 continues by identifying that '*achieving sustainable development*' means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

"an economic objective – to help build a strong and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provisions of infrastructure;

a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places with accessible services and open space that reflect current and future needs and support communities' health, social and cultural well-being; and



an environmental objective – to protect and enhance our natural, built, and historic environment; including making effective use, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

The proposed development is considered to be in accordance with the aim of achieving sustainable development as it will play a part in the continuing, successful operation of the BRM site. No significant adverse environmental impacts have been identified as a result of the construction and operation of the emissions management building.

Section 6 – Building a Strong, Competitive Economy

Section 6 of the NPPF relates to ‘building a strong, competitive economy’.

Paragraph 85 states that *“planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, an in areas with high levels of productivity, which should be able to capitalise on their performance and potential”*.

Section 11 – Making Effective Use of Land

Section 11 of the NPPF relates to ‘making effective use of land’. **Paragraph 123** states that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

Paragraph 124 details what planning policies and decision should do in relation to making best use of land, it states that *“planning policies and decisions should:*

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*

In line with this section of the NPPF, the proposed development would be located on a brownfield site, within a much larger, established industrial site and will be ancillary to existing operations on that site.

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 14 relates to meeting the challenge of climate change, flooding, and coastal change.

Paragraph 158 states that *“plans should take a proactive approach to mitigating and adapting*



to climate change” this is now, more than ever, an important and vital aspect to all planning applications that are submitted. **Paragraph 159** goes on to state that “new development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaption measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emission, such as through its location, orientation, and design. Any local requirements for sustainability of buildings should reflect the Government’s policy for national technical standards.”

The proposed development would not lead to additional on or off site flooding. It would be built upon existing hard standing and drain to an established surface water drainage system.

Section 15 – Conserving and Enhancing the Natural Environment

Section 15 relates to ‘conserving and enhancing the natural environment’.

Paragraph 180 of the NPPF states that “planning policies and decision should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

Given the small scale of the proposed development and the fact that it will be located within an established industrial area, no significant adverse impacts on the site or surrounding environment are anticipated. No natural habitat would be lost.

The operation of the emissions management building will be controlled by planning conditions and an environmental permit. All technology to be used is tried and tested.

Paragraph 186 addresses determining developments:

“When determining planning applications, local planning authorities should apply the following principles:



- a) *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists; and*
- d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."*

Although the application site is in close proximity to a SSSI, the proposed emissions management building will be operated in accordance with an Environmental Permit, which will control emissions to the required levels, so as not to cause harm to the SSSI, or other sensitive receptors. As the building would be constructed upon existing hardstanding, there would be no loss of habitat.

4.2 Local Policy

Gravesham Local Plan Core Strategy (2014)

The Gravesham Local Plan Core Strategy was adopted in September 2014, the local plan core strategy is the main document in the Gravesham Local Plan.

The following policies are considered pertinent to the proposed development:

- Policy CS01: Sustainable Development
- Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- Policy CS18: Climate Change
- Policy CS19: Development and Design Principles

Policy CS01: Sustainable Development

"Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay unless material considerations indicate otherwise.

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF and in this Core Strategy. It will work proactively with applicant jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improved the economic, social, and environmental conditions in the area.



Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or*
- Specific policies in that Framework indicate that development should be restricted”.*

The proposed development would be ancillary to the operation of the surrounding BRM site and would help to retain jobs at this site. No adverse impacts of granting planning permission have been identified. Therefore, the application is considered to be in accordance with Policy CS01.

Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area

“The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design.

Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, transport and access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation, and the presence of the High Speed 1 (HS1) railway line”.

The proposed development would be ancillary to the operation of the surrounding BRM site and would help to retain jobs at this site. Therefore, the application is considered to be in accordance with Policy CS03.

Policy CS11: Transport

“New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

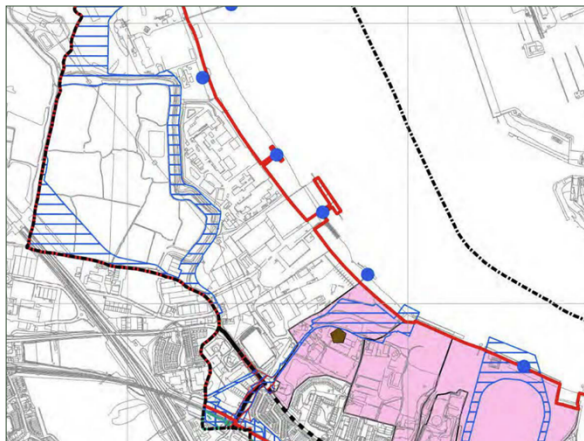
Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

Land required for the possible future extension of Crossrail and to protect the High Speed 1 (HS1) railway is safeguarded on the Policies Map and proposals that would prejudice these will be refused”.

The image below depicts the High Speed 1 safeguarding zone (see the blue horizontal lines) in relation to the Site. As the application site is outside of the safeguarding zone, and would not generate high levels of staff or operational traffic, or require additional parking spaces, the application is in accordance with Policy CS11.



Figure 4-1 Local Designations Policy Map



Policy CS18: Climate Change

Flood Risk

“With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding.

Proposals in areas at risk of flooding must be accompanied by an FRA (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests.

The application site is within an established, operational industrial site, which benefits from a Flood Risk Management Plan and Evacuation Plan for staff. The emissions management building would not lead to additional surface water run off and would not take land out of the floodplain. There are no offices/accommodation or staff welfare facilities within the emissions building. The Site meets the sequential test as it will be ancillary to use of the Sample Preparation building and therefore could not be built at a remote location.

Policy CS19: Development and Design Principles

“ New development will be located, designed, and constructed to:

- *safeguard the amenity, including privacy, daylight, and sunlight, of its occupants and those of neighbouring properties and land;*
- *avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and*
- *not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands, and coastal water systems.*

Commented [JF1]: Am I correct in saying this?

Commented [CP2R2]: I don't know - one to confirm with Nick.

Commented [LN3R2]: Agreed, not sure - point out to Nick



The proposed development comprises plant and equipment, which would be regulated by an Environmental Permit. No significant adverse impacts have been identified upon the site and surroundings.

5.0 Potential Environmental Effects

This section of the PSS sets out a summary of the potential environmental effects of the proposed development.

5.1 Permitting

The sample preparation facility and associated emissions management building will require an environmental permit from the Gravesham Borough Council in order to operate. At the time of writing, Britannia Refined Metals are consulting with Gravesham Borough Council to determine the type of environmental permit required and scope of assessments required to inform the application.

5.2 Air Quality

As stated above, the Site is situated within the Northfleet Industrial Area AQMA as designated by Gravesham Borough Council.

An Air Emissions Risk Assessment (AERA) is being undertaken to assess potential air quality impacts as a result of process emissions from the emission stack. The assessment is being undertaken using atmospheric dispersion modelling to dispersion of a suitable range of pollutants. The assessment will assess the significance of potential changes in air quality as a result of emissions to air from the Proposed Development, considering both human and ecological receptors.

5.3 Noise and Vibration

The proposed emissions management building is not anticipated to give rise to significant adverse noise and vibration impacts. The Site is located within a much larger, operational industrial estate and noise from the emissions management building would not be audible in the context of background noise from the wider site.

5.4 Landscape and Visual

The proposed emissions management building would be viewed against the background of the much larger BRM industrial site. Therefore, no significant adverse landscape and visual impacts have been identified.

5.5 Traffic and Transport

There would be significant traffic impact resulting from the proposed development and no new access or car parking required.

5.6 Ecology and Biodiversity

The proposed emissions management building would be fully contained within the established industrial site and all emissions would be controlled by the Environmental Permit. No habitat would be lost as a result of the development. As the development would create less than 1,000m² of floorspace, it is exempt from BNG requirements at this time.



5.7 Water Environment

This small development would be built on existing hardstanding and would drain into the established surface water drainage system. No additional surface water run off would arise as a result of the presence of the development. Therefore, no risks to the water environment have been identified.

5.8 Archaeology and Heritage

The proposed emissions management building would be built upon existing hardstanding, therefore no ground disturbance would be required, avoiding the risk of affecting buried archaeology. The application site would not be visible from the designated heritage assets in the wider area, therefore no harm is anticipated.



6.0 Summary and Conclusion

6.1 Summary

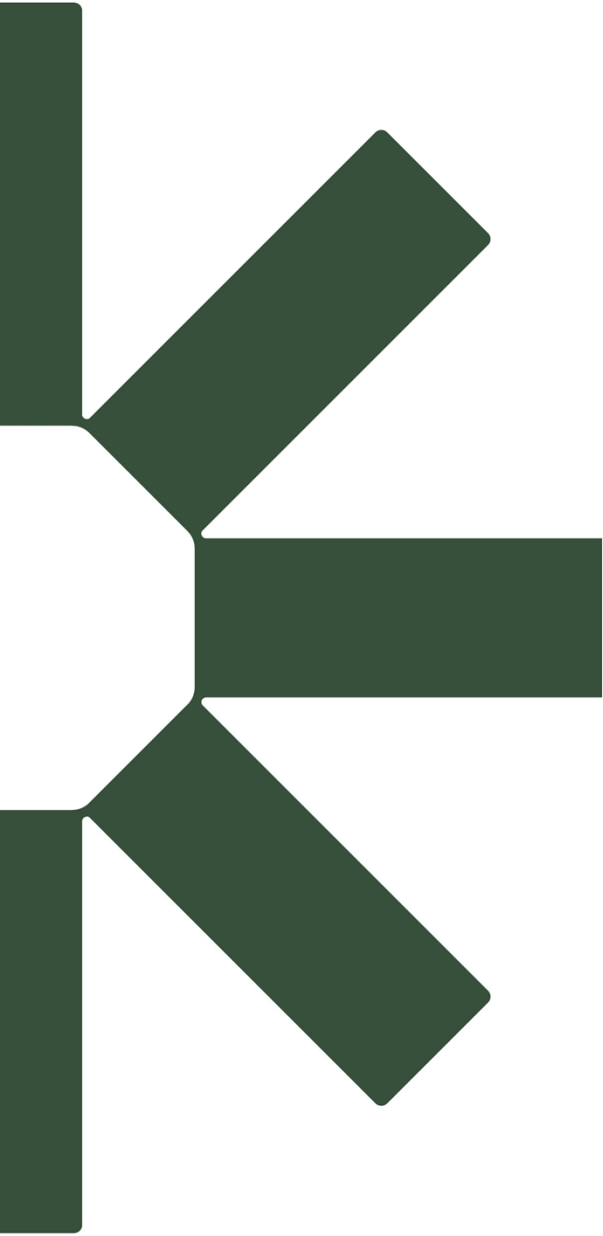
This Planning Supporting Statement has been prepared on behalf of Britannia Refined Metals (BRM) by SLR Consulting Ltd (SLR) in support of the planning application for the proposed emissions buildings, including a baghouse and stack situated in the south western corner of the BRM Site at Northfleet.

The development would be ancillary to the permitted Sample Preparation Building and would ensure that dust and emissions from the building would be managed in accordance with an Environmental Permit.

The potential environmental impacts of the emissions building have been considered and no significant adverse effects have been identified.

In summary, the emissions building would be located on a brownfield site, within an established industrial area and would be required to support the operation of the Sample Preparation Building. The proposed development has been found to be in accordance with national and local policy.





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