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Kelly Joyce
Gravesham Borough Council
Sent via email

Our ref: KT/2025/132275/02-L01
Your ref: 20250030

Date: 26 March 2025

Dear Kelly Joyce

Application For Approval Of Condition 3, 4, 5 And 9 Attached To Planning Permission Reference Number 20240234 Relating To A Strategy To Deal With The Potential Risks Associated With Any Contamination Of The Site, A Construction Management Plan, An Asbestos Risk Assessment Under The Control Of Asbestos Regulations 2012 Shall Be Undertaken And Submitted, Piling Or Any Other Foundation Designs Using Penetrative Methods.

Britannia Refined Metals Ltd, Lower Road, Northfleet, Gravesend, Kent DA11 9BG

Thank you for reconsulting us on the above application, which we received on 26 March 2025. As part of this application, we have reviewed the following reports:

- Ground Investigation Report produced by SLR Consulting Limited (ref: 402.064683.00001, dated 19th October 2023)
- Piling Risk Assessment produced by SLR Consulting Limited (ref: 402.064683.00001, dated 12th February 2024)

Environment Agency Position

We have **no objections** to the discharge of conditions 3 and 9.

Groundwater and Contaminated Land Technical Comments

We have reviewed the Ground Investigation Report produced by SLR Consulting Limited (ref: 402.064683.00001, dated 19th October 2023) and understand that limited concentrations of contaminants have been identified underlying the site. Contaminants identified to exceed the Generic Assessment Criteria for commercial end use include arsenic and lead, with Lead being identified in particularly high concentrations of 52000mg/kg. It is understood that the site is covered in hardstanding and is proposed to remain so, the potential pathway to the underlying groundwater is broken and as such no remedial measures are recommended at the site.

We would consider this acceptable in principle, however we would recommend that a Discovery Strategy be implemented on site and that all boreholes are suitably decommissioned.

We have reviewed the Piling Risk Assessment produced by SLR Consulting Limited (ref: 402.064683.00001, dated 12th February 2024) and understand that Continuous Flight Auger piles are recommended to prevent the production of potential pathways between the deeper chalk and shallower Boyn Hill Gravel Aquifers. The risk to controlled waters is considered to be low given the proposed piling techniques outlined and the limited concentrations identified in the overlying made ground and shallow groundwater.

Therefore, we would consider the reports provided to satisfy conditions 3 and 9 for this application.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours sincerely

Ms Laura Edwards

Planning Advisor

Direct e-mail KSLPLANNING@environment-agency.gov.uk