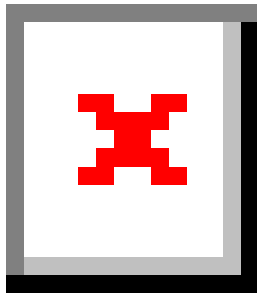


Environmental Protection COMMENTS

Case Number	20240250
Case Officer	Mrs Kelly Joyce
Address	Britannia Refined Metals Ltd, Lower Road, Northfleet, Gravesend, Kent, DA11 9BG
Proposal	KCC Consultation GR/23/376/R6 (KCC/GR/0040/2024) - Details of piling risk assessment pursuant to condition 6 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.
Consultation Expiry Date	17 April 2024
Date of Response	11 April 2024 (JO)

The ‘Piling Works Risk Assessment’ by WSP dated March 2024 (Report Ref: 62280170-006) has been reviewed.

The risk with piling activities on this site is that the use of the piles has the potential to create vertical pathways for contamination to move between the shallow groundwater and deeper



groundwater/the aquifer beneath the site. In addition, it can create pathways for ground gas migration.

Cast in Situ, Controlled Modulus Columns (CMC) piles have been chosen. This involves using a reverse flight auger (to the top of the gravel at 18-21m) depth and the retracting the auger and pumping the drilled hole with concrete via the hollow auger. The advantage of this method in contaminated areas is that it avoids excavation of contaminated soils and improved the efficiency of the gas membrane.

The risk assessment has taken account of the EA's guidance on piling 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' (2001). This looks at potential environmental and human health risk associated with piling and 6 scenarios are considered and risk assessed in this risk assessment.

A number of recommendations are made in the report regarding mitigation measures to reduce the risks. These are summarised in section 5.3 of the report. With the mitigation measures in place, any risk to groundwater/controlled water and human health is considered to be low.

Based on the above, this is considered satisfactory and there is no objection to Condition 6 being discharged.