



Application: 20240311
KCC Reference: GR/23/376/R5

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP

To: **Kent County Council**
First Floor, Invicta House
County Hall
Maidstone
Kent
ME14 1XX

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

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

and being **KCC Application - GR/23/376/R5. Application under Regulation 3 of the Town & Country Planning General Regulations 1992 - Details of a strategy to deal with potential risks associated with any contamination of the site pursuant to Condition 5 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.**

Referred to in your application dated 28 March 2024.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS :-

1. Kent County Council is thanked for consulting Gravesham Borough Council.

The application should be considered against relevant local and national planning policy and consultation responses as appropriate.

The following comments of the GBC Environmental Protection Team (Regulatory Services) should be taken into consideration in the determination by KCC:

These comments relate to the investigation of soil contamination and ground gas in relation to human health. Any potential contamination of groundwater/controlled water is best critiqued by the Environment Agency who, it is understood, have already made some comments.

In terms of appropriate end user for the risk assessment, the report has used criteria relating to commercial and reference has also been made to the criteria for open spaces, and this is accepted. In terms of heavy metals, Arsenic and Lead levels in excess of both commercial and open space GAC levels. Asbestos fibres were also found in a number of samples in the made ground areas in the south of the site. There was also evidence of PAHs and VOCs in excess of the relevant criteria.

In terms of ground gas, very little biodegradable material was found in the made ground areas. Ground gas monitoring was undertaken (6 rounds). Some carbon dioxide and methane was found and the site classed as CS-2/low (BS8485:2015+A1:2019).

The revised risk assessment following the intrusive sampling places the site at high/moderate risk to commercial/industrial site users and also other persons entering onto the site based on the contaminants found in the made ground. There is also a moderate risk of ground gas to any buildings being constructed and gas protection measures are required in accordance with CS-2.

Recommendations for further investigation and remediation is given in section 11.2 (Scenario C), and in respect of the risk to human health and also ground gas/buildings, these are agreed,

In respect of Condition 5, parts (i), (ii) and (iii) have been met.

.ated this 26th day of April 2024

Address; Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Shazad Ghani
MPhil, MA, BA (Hons)
Head of Planning
Planning Service