



Delegated Report

KCC Consultation

Planning Application No: 20240311

Location: Britannia Refined Metals Ltd Lower Road Northfleet Gravesend

Description: 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.

Applicant: Kent County Council

Site Visit Date: None (desktop assessment only)

Introduction

Kent County Council (KCC), as the determining Planning Authority, has consulted Gravesham Borough Council (GBC) for its views on the discharge of condition 5 (details of a strategy to deal with potential risks associated with any contamination of the site) of planning permission reference GR/23/376, for an enclosed electronic waste (E-Scrap) transfer facility at Britannia Refined Metals, Lower Road, Northfleet (KCC reference GR/23/376/R5).

Submitted Documents/Plans

The planning application documents are available on the KCC website using reference GR/23/376/R5 via the following link;

[Planning Register : Kent County Council \(kentplanningapplications.co.uk\)](https://kentplanningapplications.co.uk)

Relevant Planning History

Reference	Description	Decision	Decision Date
20230376	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 the demolition of existing buildings, 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.	Observations Sent	10.05.2023

Consultations, Publicity and Representations

As the determining authority, KCC have the responsibility to undertake relevant statutory consultations and publicity. However, the following consultations have been undertaken by GBC;

GBC Environmental Protection Team (Regulatory Services)

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.

Officer's Analysis

The application should be considered by KCC against relevant local and national planning policy as appropriate.

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

Expert advice will be provided as necessary by other consultations undertaken by KCC.

Conclusion & Recommendation

The application should be considered against relevant local and national planning policy and consultation responses as appropriate. The comments of the GBC Environmental Protection Team (Regulatory Services) should be taken into consideration in the determination.

Kent County Council is thanked for consulting Gravesham Borough Council.

(For a detailed response wording, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	25th April 2024	Dated:	26 April 2024

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