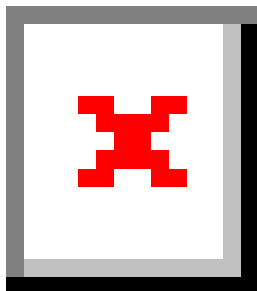


## Environmental Protection COMMENTS

---

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Case Number</b>              | 20240294                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Case Officer</b>             | Mrs Kelly Joyce                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Address</b>                  | Britannia Refined Metals Ltd, Britannia Metal Refinery And Premises, Lower Road, Northfleet, Gravesend, Kent , DA11 9BG                                                                                                                                                                                                                                                                                                             |
| <b>Proposal</b>                 | KCC Consultation GR/23/376/RVARA - Application under Regulation 3 of the Town & Country Planning General Regulations 1992 - Details of an Archaeological Investigation (Condition 3), a Construction Environmental Management Plan (Condition 4), and a request to carry out piling between March and August (condition 17) pursuant to planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility. |
| <b>Consultation Expiry Date</b> | 23 April 2024                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Date of Response</b>         | 11 April 2024 (JO)                                                                                                                                                                                                                                                                                                                                                                                                                  |

Condition 3 (archaeological investigation) – This does not fall within our remit.



#### Condition 4 (Construction Environmental Management Plan) -

Condition 4 reads as follows:

Except for demolition of the building on site, no development shall take place until details of a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Waste Planning Authority. The document shall include, amongst other matters, the mitigation measures recommended by the Preliminary Ecological Appraisal, Ecological Method Statement and associated species reports, dust / air quality mitigation measures during construction (including those outlined within the Air Quality Assessment), arrangements to manage / mitigate construction traffic, procedures outlining how complaints will be dealt with, and contact details for a responsible person(s). Thereafter the CEMP shall be implemented as approved for the duration of the construction period.

As ecology does not fall within our remit, no comments can be made regarding the CEMP in relation to this.

Details regarding construction traffic is more one for the Highways Officer to comment on.

The submitted CEMP by WSP dated 8 March 2024 (Rev 1) and associated documents relating to piling and noise have been reviewed with regards to noise/vibration, dust, contaminated land and impact on the local environment.

With regards to air quality, a Dust Management Plan (DMP) has been proposed and the details in this are in accordance with the mitigation measures proposed in the Air Quality Assessment submitted with the original application.

The site working hours in the CEMP are in accordance with those specified on the planning decision. With respect to noise and vibration, a BS88228 construction noise assessment hasn't been undertaken as there are no sensitive receptors nearby. This is accepted and noise/vibration is unlikely to be an issue with respect to sensitive (human) receptors in this location. Best practice measures are proposed. Further information regarding potential noise and vibration associated with the piling has been addressed in supporting documents.

In terms of contamination, the Piling Risk Assessment has addressed this, and the CEMP reflects knowledge of this and advises that it will be followed during all piling activities. In addition, additional measures are proposed regarding the excavation of any contaminated soils and copies of the Ground Investigation Reports will be available on site.

An appropriate complaints and monitoring procedure has been proposed.

From our perspective, the CEMP is acceptable and there is no objection to this condition being discharged.

Condition 17 (Piling between March and August) – this was attached to avoid disturbing breeding birds. This does not fall within our remit so no comments to make regarding this.