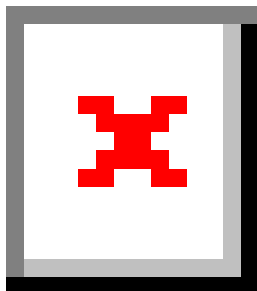


Environmental Protection COMMENTS

Case Number	20240311
Case Officer	Mrs Kelly Joyce
Address	Britannia Refined Metals Ltd, Lower Road, Northfleet, Gravesend, Kent, DA11 9BG
Proposal	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.
Consultation Expiry Date	7 May 2024
Date of Response	18 April 2024 (JO)

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.