



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce

FROM: Helen Forster

DATE: 06 June 2024

SUBJECT: Britannia Refined Metals Ltd, Northfleet 20240234

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

We advise that we are satisfied that no ecological surveys required as part of this application.

We have taken this view as the site is within the footprint of an active industrial area and located entirely on hard standing.

The site is adjacent to the Swanscombe Peninsula SSSI however there is a risk that the building may have a negative impact on the SSSI due to increase in noise and air quality and limited information has been provided to address this matter.

Noise

The planning statement which states the following regarding noise and the operational impact:

The proposed emissions management building is not anticipated to give rise to significant adverse noise and vibration impacts. The Site is located within a much larger, operational industrial estate and noise from the emissions management building would not be audible in the context of background noise from the wider site.

No information has been provided on how the building will be constructed for example will piling be used to create the foundations.

We acknowledge that there are existing buildings between the development site and the SSSI which is likely to minimise noise associated with the construction and operational phase on the SSSI. In addition we do acknowledge that any birds recorded within the area directly next to the wider site are likely to be habituated to existing noise levels within the area.

We advise that if GBC are satisfied that the noise associated with the construction and operational phase is not likely to result in an increase in noise levels within the site as a whole we are satisfied that no further information is required.

We advise that if the construction is likely to result in significant increase in noise levels the works must commence outside of the breeding bird season to avoid disturbing any breeding birds associated with the SSSI.

This conclusion is supported by the planning statement which states the following regarding noise:

The proposed emissions management building is not anticipated to give rise to significant adverse noise and vibration impacts. The Site is located within a much larger, operational industrial estate and noise from the emissions management building would not be audible in the context of background noise from the wider site.

Air Quality

The planning statement states the following: *An Air Emissions Risk Assessment (AERA) is being undertaken to assess potential air quality impacts as a result of process emissions from the emission stack. The assessment is being undertaken using atmospheric dispersion modelling to dispersion of a suitable range of pollutants. The assessment will assess the significance of potential changes in air quality as a result of emissions to air from the Proposed Development, considering both human and ecological receptors.*

We note that the Air Emissions Risk Assessment has not been provided and therefore it is not clear if the proposal will have a negative impact on the SSSI.

We recommend that the air quality emissions risk assessment is submitted as part of this application.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Planning Supporting Statement; SLR; February 2024