



Delegated Report

Adjoining Authority Consultation Application

Planning Application No: 20250933

Location: Britannia Refined Metals Ltd Lower Road Northfleet Gravesend

Description: KCC Consultation GR/23/376/R5_R20 - Application under Regulation 3 of the Town _ Country Planning General Regulations 1992 - Details pursuant to condition 5 (verification plan covering the potential risks associated with contamination of the site) and condition 20 (details of a verification report demonstrating the completion, effectiveness of remediation works) of planning permission GR/23/376 for an electronic waste (E-Scrap) transfer facility.

Applicant: Kent County Council

Site Visit Date: Desktop assessment

Submitted Documents/Plans

Kent County Council has submitted the following in support of the application:

Consultation letter dated 17 September 2025

Relevant Planning History

Reference	Description	Decision	Decision Date
20250837	KCC Consultation GR/23/376/R3&R21- Details of a Geoarchaeological post-excavation assessment (Condition 3), and a Verification Report relating to the surface water drainage system (Condition 21) pursuant to planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.	Observations sent	07.10.2025
20250825	KCC Consultation GR/23/376/RB - Non-material amendment to planning permission GR/23/376 to amend the dimensions and height of the firewater tank and to modify the size and design of the adjacent pump house.	Observations sent	20.08.2025
20250824	KCC Consultation GR/23/376/RA - Non-material amendment to planning application GR/23/376 to amend the approved dust extraction equipment, personnel doors/roll-up doors/translucent panels/emergency ladder, welfare building and footways.	Observations sent	20.08.2025
20250823	KCC Consultation GR/23/376/R - Non-material amendment to planning application GR/23/376 to amend the design, size and location of the approved UKPN substation.	Observations sent	20.08.2025
20250229	KCC Consultation GR/23/376/R42; Details of a report on the economic viability and development potential for the	Observations sent	23.07.2025

	adjacent wharf pursuant to condition 42 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility		
20250137	KCC Consultation GR/23/376/R10 (KCC/GR/0137/2024) - Details of a built survey report confirming a continuous tidal flood defence level of 7m AOD pursuant to Condition 10 of planning permission GR/23/376.	Observations sent	04.03.2025
20250120	KCC Re-Consultation GR/23/376/R13 (KCC/GR/0126/2024) - Application under Regulation 3 of the Town & Country Planning General Regulations 1992 - Details of an updated landscape and ecological enhancement scheme pursuant to Condition 13 of planning permission GR/23/376.	Observations sent	28.02.2025
20240986	KCC Consultation GR/23/376/R23 - Details of a scheme of external lighting pursuant to Condition 23 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.	Observations sent	20.11.2024
20240958	KCC Consultation GR/23/376/R11&R22 - Details of external construction materials pursuant to Condition 11 and a Dust Management Plan (DMP) pursuant to Condition 22 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.	Observations sent	20.11.2024
20240896	KCC Consultation GR/23/376/R10 - Details of a built survey report confirming a continuous tidal flood defence level of 7m AOD pursuant to Condition 10 of planning permission GR/23/376.	Observations sent	24.10.2024
20240799	KCC Consultation GR/23/376/R13 - Application under Regulation 3 of the Town & Country Planning General Regulations 1992 - Details of an updated landscape and ecological enhancement scheme pursuant to Condition 13 of planning permission GR/23/376.	Observations sent	19.09.2024
20240311	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.	Observations sent	26.04.2024
20240294	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.	Observations sent	18.04.2024
20240250	KCC Consultation GR/23/376/R6 (KCC/GR/0040/2024) - Details of piling risk assessment pursuant to condition 6 of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.	Observations sent	18.04.2024
20240249	KCC Consultation GR/23/376/RVAR (KCC/GR/0035/2024) - Details of a final design and program for repairing and raising flood defence level to 7M AOD (inclusive of the existing sheet piled wall and the northern flood gate) (Condition 7), details of the detailed final design for the removal of the southern flood gate and its replacement	Observations sent	02.04.2024

	with a fixed flood defence Condition 8) and details of a program of repairs and maintenance for the northern flood gate (Condition 9) pursuant to planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.		
20231309	KCC Consultation GR/23/376 (KCC/GR/0050/2023) Application under Regulation 3 of the Town _ Country Planning General Regulations 1992 - 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	12.01.2024
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 Gravesham Borough Council: Environmental Protection.

Officer Analysis

The application comprises a Kent County Council consultation on application GR/23/376/R5&R20 relating to details pursuant to condition 5 (verification plan covering the potential risks associated with contamination of the site) and condition 20 (details of a verification report demonstrating the completion, effectiveness of remediation works) of planning permission GR/23/376 for an enclosed electronic waste (E-Scrap) transfer facility.

The details relating to Condition 5 (Contamination) are as follows:

Except for demolition of the building on site, no development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Waste Planning Authority. This strategy will include the following components:

- i. A preliminary risk assessment which has identified:*
- o all previous uses;*

o potential contaminants associated with those uses;
o a conceptual model of the site indicating sources, pathways and receptors; and
o potentially unacceptable risks arising from contamination at the site.

ii. A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

iii. The results of the site investigation and the detailed risk assessment referred to in (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iv. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written approval of the Waste Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 180 of the National Planning Policy Framework, policy CS18 of the Gravesham Local Plan Core Strategy and policy DM 10 of the Kent Minerals and Waste Local Plan.

Condition 20 (Verification Report) states as follows:

20. No building shall be occupied (or used) until a verification report demonstrating the completion, and effectiveness, of remediation works approved pursuant to condition 5 above has been submitted for the written approval of the Waste Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. If the report is unable to demonstrate that the agreed standard of land restoration work has been achieved, further details will be submitted for the prior written approval of the Waste Planning Authority setting out how any residual contamination risks will be dealt with and managed. The updated remediation strategy shall be implemented as approved.

Reason: To ensure that the site does not pose any further risk to human health, the water environment, or nearby ecological receptors by demonstrating that the requirements of the approved remediation strategy have been met and that remediation of the site is complete.

Parts (i), (ii) and (iii) of Condition 5 were determined to have been met under previous KCC application GR/23/376/R5.

The Council's Environmental Protection team have provided the following comments:

Condition 5 refers to the impact in terms of water pollution and condition 20 relates to risk associated with human health and the water environment. These comments relate to the risk to human health. Any risk/works in relation to the risk of contamination of groundwater or controlled water is best critiqued by the Environment Agency who have the expertise in this area of work.

The submitted documentation has been reviewed. The Ground Gas Verification Report dated 8 September 2025 by EPG provides an overview of the site investigation, design of gas protection measures and verification plan/method. Other documentation submitted indicates that the required ground gas protection system has been installed correctly.

The documents demonstrate that the required remediation works have been satisfactory installed and verified.

There is no objection to the final part of condition 5 or condition 20 being discharged.

There are therefore no objections with the submissions from the Borough Council's perspective, and the

application should be considered against relevant local and national planning policy as appropriate, with expert advice provided as necessary by any other consultations.

Recommendation

No objections.

Kent County Council is thanked for consulting Gravesham Borough Council.

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:	<i>K. Parkin</i>	Signed:	<i>R Hart</i>
Dated:	9th October 2025	Dated:	10th October 2025