



Application: 20240250
KCC Reference: GR/23/376/R6 (KCC/GR/0040/2024)

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP

To: **Kent County Council**
Planning Applications Group
First Floor
Invicta House
County Hall
Maidstone
Kent
ME14 1XX

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Britannia Refined Metals Ltd**
Lower Road
Northfleet
Gravesend
Kent
DA11 9BG

and being **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.**

Referred to in your application dated 14 March 2024.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS :-

1. Kent County Council is thanked for consulting Gravesham Borough Council.

The application should be considered against relevant local and national planning policy and consultation responses as appropriate.

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

The 'Piling Works Risk Assessment' by WSP dated March 2024 (Report Ref: 62280170-006) has been reviewed.

The risk with piling activities on this site is that the use of the piles has the potential to create vertical pathways for contamination to move between the shallow groundwater and deeper groundwater/the aquifer beneath the site. In addition, it can create pathways for ground gas migration.

Cast in Situ, Controlled Modulus Columns (CMC) piles have been chosen. This involves using a reverse flight auger (to the top of the gravel at 18-21m) depth and the retracting the auger and pumping the drilled hole with concrete via the hollow auger. The advantage of this method in

contaminated areas is that it avoids excavation of contaminated soils and improved the efficiency of the gas membrane.

The risk assessment has taken account of the EA's guidance on piling 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' (2001). This looks at potential environmental and human health risk associated with piling and 6 scenarios are considered and risk assessed in this risk assessment.

A number of recommendations are made in the report regarding mitigation measures to reduce the risks. These are summarised in section 5.3 of the report. With the mitigation measures in place, any risk to groundwater/controlled water and human health is considered to be low.

Based on the above, this is considered satisfactory and there is no objection to Condition 6 being discharged.

Dated this 18th day of April 2024

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