



Application: 20240294
KCC Reference: GR/23/376/RVARA

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**
Britannia Metal Refinery and Premises
Lower Road
Northfleet
Gravesend
Kent
DA11 9BG

and being **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.**

Referred to in your application dated 28 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;

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 his 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.

Dated this 18th day of April 2024

Address; Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Shazad Ghani
MPhil, MA, BA (Hons)
Head of Planning
Planning Service