

Intended for
RGE Recycling Ltd
Date
October 2025
Project Number
(RGE-2025/001)

RGE Recycling Ltd

Royal Eagle Close

Site Condition Report



RGE Recycling Ltd

Site Condition Report

Project No. RGE-2025/001
Issue No. 1
Date October 2025
Author Kieran Ball
Checked Stephen Griffiths

This report has been prepared by The Permitting Company Limited with all reasonable skill, care and diligence, and taking account of the Services and Terms agreed between The Permitting Company Limited and the Client. This report is confidential to the Client, and the Permitting Company Limited accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by The Permitting Company Limited beforehand. Any such party relies upon the report at their own risk. The Permitting Company Limited disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of Services.

Version Control Log

Revision	Date	Made by	Checked by	Description
01	03/10/25	KB	SG	Initial creation

The Permitting Company Limited

Office 62
Wilkinson Place
Witney
Oxfordshire
OX28 6JT

Contents

1. Introduction	3
2. Condition of Land at Permit Issue	4
Introduction	4
Geology and Hydrogeology	4
Hydrology	5
Natural Hazards	7
Site History	9
Pollution Incidents	10
Site Investigation and Assessment Reports	10
Baseline Data	10
3. Permitted Facility	12
Permitted Activities	12
Non-Permitted Activities	12
Preventative Measures	12
4. Statement of Site Condition	14

1. Introduction

Scope

The Permitting Company Limited (TPC) has been commissioned by RGE Recycling Limited (RGE) to prepare and submit a Site Condition Report in support of a Bespoke Permit Application for a Metal recycling facility in Royal Eagle Close, Rochester. The relevant documentation is submitted in accordance with the Environmental Permitting (England and Wales) Regulations 2016 (referred to hereafter as the EP Regulations).

The Site Condition Report has been compiled in accordance with the EP Regulations and with Horizontal Guidance Note 5, Site Condition Reports - Guidance and Templates. Information has been gathered from a number of sources including a Groundsure report, photographs and observations made by TPC.

The purpose of the initial Site Condition Report is to provide a factual statement of the condition of the site at the time of the Environmental Permit Application.

Site Location

The site is located at Royal Eagle Close, Rochester, ME2 4NF. It is approximately 1200m north-east of the centre of Rochester in the county of Monroe. The site is situated within a larger industrial estate and is accessed via Anthonys Way to the west.

The site is approximately centred at National Grid Reference (NGR): TQ 75341 69618. The location of the site can be seen on the Location Plan in Appendix 1.

The permit boundary is illustrated on Permit boundary Plan in Appendix 2. The site is currently used as a metal recycling facility working under environmental exemptions.

The site is in a built-up area of Rochester with a mixture of light and heavy industry with a close proximity to the river.

The closest residential properties are around 1000m southeast, beyond the River Medway leading off Wood Street and Dock Road.

2. Condition of Land at Permit Issue

Introduction

This Site Condition Report covers the full extent of the RGE Recycling Limited's landholding as shown in Appendix 2. The baseline condition of the site has been determined from a review of the available published information including: -

- Groundsure Enviro+Geo Insight Report (Appendix 3)
- Environment Agency web-based data.
- DEFRA Magic Map

Geology and Hydrogeology

Made Ground: Although the BGS “artificial and made ground” layer shows no polygons at 1:50,000 scale within 500 m, the site is a long-established, fully hard-surfaced industrial plot; the lack of mapping should not be taken to mean made ground is absent at shallow depth.

Solid and Drift Geology: Published BGS mapping at 1:50,000 scale shows the site is mantled by Quaternary superficial deposits of Alluvium—clay, silt, sand and peat—with areas of undifferentiated beach and tidal-flat deposits also recorded directly beneath the footprint. Similar alluvial ground is mapped in every direction within tens of metres, with local patches of Head (clay and silt) and River Terrace Deposits (sand and gravel) appearing a little farther out. On this mapping, the estimated vertical permeability of the superficial cover is “intergranular: moderate to very low,” which is consistent with fine-grained, estuarine alluvium limiting infiltration except via any made-ground breaks or service runs.

Beneath the drift, the bedrock is Chalk of the Lewes Nodular, Seaford and Newhaven Chalk formations (undifferentiated). The Chalk here is characterised by very high fracture permeability on the BGS dataset, reflecting the importance of fissures and any solutional features for groundwater movement. No mapped bedrock faults occur within 500 m.

Hydrogeology: The Groundsure dataset identifies both a superficial aquifer (associated with the tidal alluvium) and a Principal Aquifer in the bedrock (the Chalk). In practice this means any infiltration that reaches the drift will move slowly where the alluvium is clay-rich, but could transfer more readily into fissures and solutional voids in the Chalk if pathways exist. Groundwater vulnerability is flagged on site, with a “soluble rock risk” also recorded, again consistent with Chalk karst potential.

Within the wider setting, a Source Protection Zone is present about 2 km to the west, with no recorded potable abstractions within 2 km and one groundwater abstraction in the 0.5–2 km band. The nearest surface water is Whitewall Creek, a tidal arm of the Medway

estuary approximately 84 m to the north-east. The adjacent transitional Water Framework Directive water body is the “Medway,” assessed in 2019 as moderate overall (moderate ecology; chemical “fail”). These factors reinforce that any uncontrolled releases on site could find a short pathway to surface waters during rainfall via yard drainage or minor infiltration to shallow groundwater with tidal influence.

Table 1 describes the groundwater vulnerability.

Table 1 – Groundwater Vulnerability

Summary	Soil/Surface	Superficial Geology	Bedrock Geology
Summary Classification: Secondary superficial aquifer - High Vulnerability Combined classification: Productive Bedrock Aquifer, Productive Superficial Aquifer	Leaching class: High Infiltration value: >70% Dilution value: <300mm/year	Vulnerability: High Aquifer type: Secondary Thickness: 3-10m Patchiness value: <90% Recharge potential: no data	Vulnerability: High Aquifer type: Principal Flow mechanism: Well-connected fractures

The site is not located in Source Protection Zone (SPZ). The Groundsure report shows the nearest SPZ is a Zone 3 (Total Catchment) located about 260m West of the site. The Groundsure lists zero SPZ features on-site or within 0-250m and no features in the 250-500 band.

The site is not located within a surface water Nitrate Vulnerable Zone (NVZ) as designated by the Environment Agency.

Hydrology

The closest surface water is Whitewall Creek, a tidal inlet of the River Medway, located about 84 m to the north-east of the site. The Water Framework Directive (WFD) dataset classifies the adjacent transitional water body as “MEDWAY” (ID GB530604002300). Its most recent reported status (2019) is Overall: Moderate, Chemical: Fail and Ecological: Moderate. The site lies within the Lower Medway management catchment; for WFD purposes the on-site surface-water catchment is mapped as a coastal/transitional unit rather than a river water-body catchment.

Groundwater beneath the site forms part of the North Kent–Medway Chalk WFD groundwater body (ID GB40601G500300). In 2019 this unit was assessed as Overall: Poor, with both Chemical and Quantitative elements ranked Poor.

There is a concentration of licensed discharges to controlled waters within 500 m, largely associated with the Whitewall Creek Wastewater Treatment Works (Upnor Road), 270–304 m to the northwest. Over time the WWTW has held permits for storm overflows and final treated effluent to Whitewall Creek, with the most recent variations issued under the EPR in March 2025 (Permit W00510, Version 11). Historic records also include a trade discharge for site drainage at Pelican Reach about 340 m southeast, and List 2 Dangerous Substances entries (iron, pH) linked to nearby dischargers in the Medway estuary corridor.

Abstraction data show no licensed surface-water abstractions within 2 km of the site and, therefore, none within 1 km. One historical groundwater abstraction is recorded 848 m southwest (QDS Environmental Ltd, a pollution-remediation borehole series), and there are no potable abstractions within 2 km. The site itself is not inside a Source Protection Zone, although the outer SPZ-3 (total catchment) clipping of a public supply lies roughly 260 m west.

Table 2 - Currently Authorised Surface Water Abstractions within 1km of the Site

Location	Details
848m SW Point: SERIES OF BOREHOLES – ROCHESTER RIVER SIDE Name: QDS Environmental Limited Easting: 574610 Northing: 169120	Status: Historical Licence No: 01/163 Details: Pollution Remediation Direct Source: Southern Region Groundwater Annual Volume (m3): 87600 Max Daily Volume (m3): 240 Original Application No: - Original Start Date: 22/06/2007 Expiry Date: 22/06/2012 Issue No: 1 Version Start Date: 22/06/2007 Version End Date: -

The site lies on the Medway City Estate adjacent to Whitewall Creek and the tidal River Medway. Environment Agency Flood Map for Planning data reproduced in the Groundsure report confirms that Flood Zones 2 and 3 intersect the site when flood defences are ignored; in other words, parts of the footprint are modelled to be at risk in both the 0.1% AEP and $\geq 1\%/0.5\%$ AEP events respectively.

When defences are considered, the Risk of Flooding from Rivers and the Sea (RoFRaS) classification for the site itself is “Very Low”, with the same rating recorded within 50 m. No historic flood events are logged in the immediate vicinity. The mapping also shows the site is within an “Area Benefiting from Flood Defences” and lists multiple formal defences within 250 m—consistent with the raised, engineered frontage along Whitewall Creek. This means the day-to-day probability is suppressed by the local defence standard, but a residual risk remains should those defences be overtopped or fail.

Surface water (pluvial) modelling indicates shallow ponding is possible during intense rainfall. On-site depths are typically 0.1–0.3 m in a 1-in-30 year event, increasing to 0.3–1.0 m in the 1-in-100 to 1-in-1,000 year scenarios in the immediate surrounds. This reflects the flat topography and hardstanding prevalent across the estate.

Groundwater flood susceptibility is mapped as “High” on the site at a 1-in-100 year return period, again reflecting the low-lying estuarine setting and shallow groundwater conditions typical of the Medway tidal corridor. Such flooding is usually slow-to-recede and can persist for weeks, so it is pertinent to storage and pollution-prevention design.

Natural Hazards

The Groundsure screening indicates a ground-stability profile that’s typical of an estuarine, alluvial setting. Across the site the shrink–swell potential is low overall, ranging from “very low” to “low”, which reflects predominantly low- to medium-plasticity clays. This suggests a limited risk of volumetric movement affecting slabs and service runs, albeit routine care is still sensible where new planting or tree removal could alter near-surface moisture regimes.

Running-sand potential is mapped on the site as “low” to “moderate”. In practical terms, loosely packed sandy horizons may become fluidised where groundwater is present or where water is added or removed during works. Any deeper excavations, drainage alterations or dewatering should therefore be planned with suitable temporary works and method statements to prevent ground loss and maintain bearing capacity.

Compressible deposits are the most material natural constraint. The dataset records both “moderate” and “high” compressibility on the site and in the immediate surrounds, consistent with soft, water-bearing alluvium. This points to a higher likelihood of differential settlement under sustained loads, particularly where stockpiles or plant traffic concentrate loads or where groundwater levels fluctuate. Retaining activities on existing engineered hardstanding and avoiding new point loads without geotechnical review are appropriate risk-reduction measures.

Other natural ground-movement mechanisms are not flagged as significant. Collapsible deposits are recorded as “negligible” on the site, and the landslide hazard is “very low”, meaning slope-instability problems are not expected in this generally level, developed setting. Ground dissolution of soluble rocks is also rated “negligible” on the site; while natural solution features are recorded in the wider area (solution pipes in the Chalk about 338 m to the south-west), they are not indicated beneath the operational footprint.

No radon precautions are required. The report indicates that fewer than 1% of homes in the area are above the action level, so the site does not fall within a designated Radon Affected Area.

In terms of hazardous substances the Groundsure confirms that there are no current or historical COMAH (Control of Major Accident Hazards) sites within 500 m of the site; no regulated explosives sites and no Hazardous Substances Consents are recorded in the same radius.

There are 2 fuel station entry records contained within the Groundsure report within 1km of the site. The details are contained within Table 7.

The Groundsure identifies a single current petrol filling station within 500 m of the site (Shell, Anthonys Way, ~358 m NW; LPG available; open), and records no historical petrol stations or garages in the 500 m search area.

Groundsure identifies several Local Authority-regulated activities in the surrounding estate but none on the RGE plot. The nearest historic consent is the former Hanson Aggregates roadstone-coating installation about 169 m south (Part A2 – historical permit). Other Part B activities are recorded at Arc Conbloc (quarry processes, 195 m south-east, historical), Specialised Group (vehicle respraying, 269 m west, historical) and Insulating Components & Materials Ltd (asbestos processes, ~398 m west, historical).

A current Part B permit is held by the Rochester Filling Station (Shell) for unloading petrol to storage (~377 m north-west). Groundsure also notes a 0.4 MW waste-oil burner at One Call Hire, 483 m south, now shown as “new legislation applies” (i.e. legacy Part B control superseded). No LAPPC/LA-IPPC authorisations are recorded on the application site itself.

The site sits within a 500m radius of areas of protected species and SSSI. The SSSI site approximately 312m to the north and is named Tower Hill to Cockham Woods. Natural England states the following reasoning for the notification.

“This site is of both biological and geological interest. It contains woodland representative of that on Tertiary deposits in Kent and supports a rich insect fauna. In addition, Upnor Quarry exposes a complete Tertiary stratigraphic sequence. Much of Cockham Wood consists of neglected coppice, principally ash *Fraxinus excelsior*, with oak *Quercus robur* standards. The shrub layer, which is especially varied towards the central part of the wood, is dominated for the most part by elm *Ulmus* spp., field maple *Acer campestre* and hawthorn *Crataegus monogyna*. However, many other shrubs are also represented including some characteristic of base-rich soils, such as dogwood *Cornus sanguinea*, and others of more acid soils, such as honeysuckle *Lonicera periclymenum*. Amongst the ground flora brambles *Rubus fruticosus*, dog’s mercury *Mercurialis perennis*, and nettles *Urtica dioica* are generally dominant. To the west of the wood is an area of dense scrub, but with grassy clearings maintained by rabbits. Elm suckers and hawthorn dominate the vegetation. The ground flora here are sparse, though the clearings support a number of herbs typical of calcareous pastures including yellow-

wort *Blackstonia perfoliata* and ploughman's spikenard *Inula conyza*. A narrow grassy zone, dominated by sea couch-grass *Elymus pycnanthus*, occurs at intervals along the junction between woodland and intertidal mudflats. Minor slippages and wave action have led to erosion of this habitat. A number of scarce species were formerly found in this zone but only one, bithynian vetch *Vicia bithynica*, remains. Tower Hill and Lower Upnor Quarry are sandy areas which support a very rich insect fauna. Of particular note are the aculeate hymenoptera (bees and wasps), about a third of all British species being found here including 7 nationally rare species. The geological interest of Upnor Quarry may be defined as follows: The Upnor Quarry exposes a complete Tertiary age stratigraphic sequence from the Thanet Sands, through the Woolwich and Oldhaven Beds, into the lower part of the London Clay. The Woolwich and Oldhaven Beds are of particular interest, both in the sedimentary evidence they afford of depositional conditions, and in the abundant molluscan fauna that they yield. The complex lateral facies changes in these formations makes Upnor a vital site to be viewed in comparison with other Palaeogene localities in the eastern London Basin.”

The protected species areas that are within 500m of the site are listed below:

- Allis Shad migratory route
- European Eel migratory route
- River Lamprey migratory route
- Sea Lamprey migratory route
- Smelt migratory route

Site History

Historic mapping shows the Frindsbury Peninsula as an estuarine working landscape long before the Medway City Estate was laid out. Late-nineteenth and early-twentieth century Ordnance Survey editions record intensive cement and brick activity on the creek frontage to the north of the application plot, with cement works, wharves, brickfields and a clay mill all mapped within a few hundred metres. Rail and tramway sidings served these industries, and a scatter of pits is shown across the area, reflecting large-scale extraction and fill typical of the period. By the 1930s much of the cement plant immediately north is marked as “disused”, although wharf infrastructure persists into later editions.

Through the mid- to late-twentieth century the peninsula underwent progressive redevelopment. Warehouse uses appear on mapping from the 1970s onward, alongside residual ground workings and wharfage, signalling the shift from heavy materials manufacture to storage and general industry. The present estate roads and plots follow this later phase of reclamation and levelling.

Aerial photographs from 2000, 2008, 2012 and 2018 show the application site as a hard-surfaced industrial yard throughout, with buildings opening onto the paved operational area and external storage within the plot. The 2021 imagery is consistent, indicating continuity of industrial use over at least the last two decades.

Environment Agency closed-landfill records confirm the legacy of reclamation. Two historic inert landfill entries are mapped on or immediately adjoining the site: one recorded generically as “Frindsbury Peninsula – inert”, and a second entry “Land adjacent to Antony’s Way” with a waste licence issued in December 1992 (Ref. P/03/44, now historical). These are consistent with the wider pattern of extraction and backfilling across the peninsula before the present estate was completed.

Pollution Incidents

The Groundsure lists nine substantiated pollution incidents within 500 m of the site. None are recorded on the RGE plot itself. The nearest entry is 322 m south-east (22/02/2002) involving “specific waste materials”, assessed as Category 3 (minor) for water and land with no air impact. Most other records relate to atmospheric pollutants/smoke/fumes from surrounding industrial premises between 2001 and 2015. Water and land impacts are generally Category 4 (no impact) or Category 3 (minor); two entries note Category 2 (significant) air impacts: smoke 400 m west (09/12/2003) and smoke 439 m south (07/06/2015). One incident (403 m west, 16/05/2001) involved acids with a Category 3 (minor) water impact. Overall, the local incident profile is typical of a mixed industrial estate—predominantly minor air-quality events rather than liquid releases—and it supports the proposed controls for sealed drainage, spill prevention and good housekeeping on hardstanding.

Site Investigation and Assessment Reports

This Site Condition Report has been prepared on a Desk Study basis in order to characterise the baseline conditions at the site. No relevant site investigation data or associated reports were available that would have enabled any further meaningful characterisation to take place.

Baseline Data

As discussed in section 2.6.1 above, no site-specific intrusive baseline reference data was considered necessary for review at the application stage to determine the current ground conditions of the application site.

The historical use of the site and surrounding area presents the possibility of historic contamination beneath and around the site. The yard is concrete sealed, and it is not considered the best course of action to disturb the concrete to carry out intrusive investigation.

3. Permitted Facility

Permitted Activities

Activities on site currently consist of the receipt, unloading, manual sorting, storage, shearing, and bailing of ferrous non-ferrous metal wastes for recovery. The site also accepts UPVC for storage and transfers only – No treatment. In practice, sorting does not take place often as all waste types received is clearly documented, and visually identifiable which allows it to be directed easily to the appropriate part of the site (the relevant bay that is currently housing that waste metal type). Sorting will only occur to separate ferrous and non-ferrous metals from mixed loads. This document represents the current waste types proposed to be accepted/processed. The current waste treatment processes are listed below:

- **Sorting** - Incoming loads are mostly single waste stream from either pre-treatment or manufacturing processes. Sorting is only required for mixed loads accepted on site; this is carried out manually with the material handler, the target materials are high value ferrous and non-ferrous metals. Any residues of the sorting process will be dispatched for further treatment of site.
- **Shearing** - This takes place in the yard outside with an attachment on the material handler, and a static LeFort shear. This treatment process is carried out to reduce the particulate size of metal waste to facilitate handling and transport.
- **Bailing** - The bailing process is designed to compress metals for easier handling, storage and transport.

All of the above will be sort within the Bespoke permit application.

Non-Permitted Activities

All operations at the site are supported by office accommodation, access road and welfare facilities etc, which will not be subject to the requirements of the Environmental Permit.

Preventative Measures

The primary mitigation from potential pollution is the storage of potential polluting substances within appropriate engineered areas. In addition to this, emergency

procedures are in place to deal promptly with any spillage of dangerous substances onsite.

4. Statement of Site Condition

Site photographs are included in Appendix 4.

The yard is surfaced with concrete seems to be in a good state. The applicant has advised that the site that under the permit, the infrastructure will need to be continually maintained to as waste operations are to be upon an impermeable surface. It is to be noted that an area outside of the unit and vehicle parking area is a laid brick SuDS, waste will not be able to be stored nor treated upon this section of the site.

The site is currently in operation under exemptions, storing and treating scrap metals and UPVC.

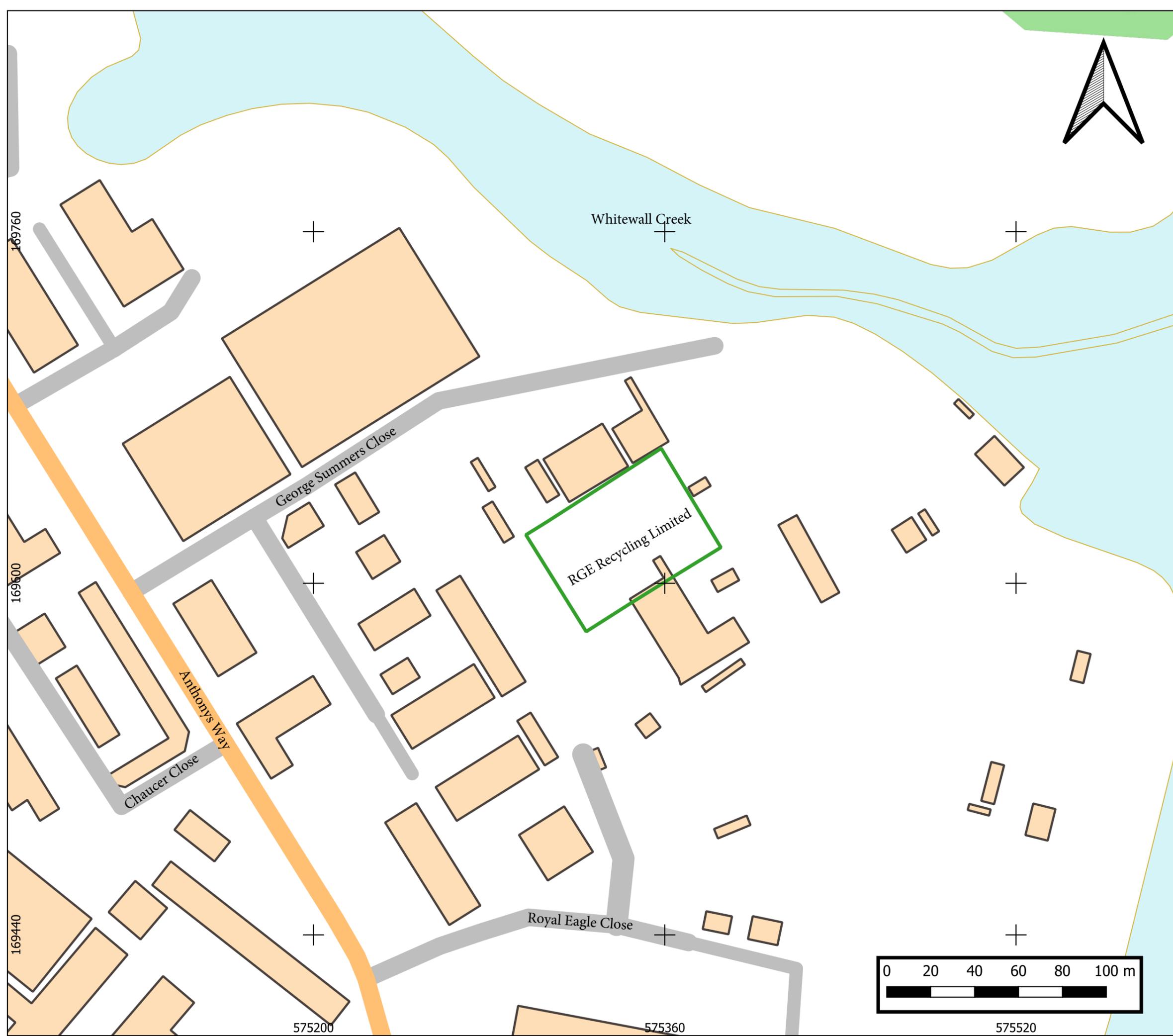
The site perimeter is secured by a metal fencing and lockable gates photographs. The site is also covered by CCTV mounted externally.

The site houses its diesel store within a bunded transportable diesel tank by Rextank.

The investigation into the sites condition, does shows that the site would be able to sustain a bespoke permit without a high risk to the local environment and nearby protected species as long as the appropriate management and control measures are in place within the EMS and DEMP and are followed by the operator.

[End of Document](#)

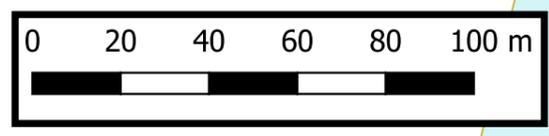
Appendix 1: Site Location Plan



Key:
 Permit Boundary

Drawing Title: Permit Boundary Plan
Ref:
Scale: 1:1600 (A3)
Date: 2025-10-07
Revison:
Drawn By: TW
Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
 - N/A



169760
 169600
 169440

575200

575360

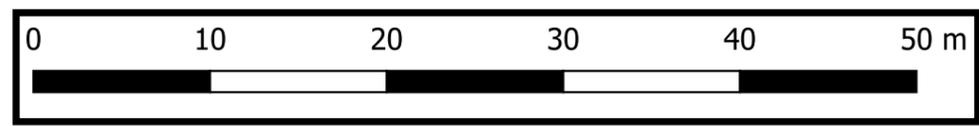
575520

Appendix 2: Permit Boundary



- Key:
- Permit Boundary
 - Impermeable Surface
 - Building
 - Legio Block Wall
 - Quarantine Area
 - Mobile Plant Parking Area
 - Fuel Bowser
 - Ro-Ro Skip
 - Fire Extinguisher
 - Spill Kit
 - Interceptor Gully Cover
 - Interceptor Balloon
 - Surface Water Flow

Drawing Title: Site Layout Plan
 Ref:
 Scale: 1:400 (A3)
 Date: 2025-07-30
 Revison:
 Drawn By: TW
 Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF
 Changelog:
 - N/A



Appendix 3: Groundsure Report

Appendix 4: Site Photographs




Caution
Fall from heights
Work at heights




OIL
STORE





REXTANK.COM



