



## **Ravenswood Environmental Services Ltd**

[RavenswoodEnvironmentalServices@outlook.com](mailto:RavenswoodEnvironmentalServices@outlook.com)

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# Non-technical Summary

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Roadstone Limited

Unit 5 Invicta Park,  
New Hythe Lane,  
Larkfield  
Aylesford,  
Kent,  
ME20 7FG

**Client:** Roadstone Limited

**Reference:** **EPR/LP3428LU/P001**

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**Prepared by:** Andy Coleman

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**REPORT  
AUTHOR**

**ANDY COLEMAN**

<b>SIGNED</b>	
<b>CHECKED BY</b>	
<b>SIGNED</b>	
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## 1. Introduction

This non-technical summary has been produced in support of the application for a bespoke waste management permit in the name of Roadstone Limited.

To support this application the following documentation is submitted in addition to this non-technical summary.

- Fire Prevention Plan (FPP)
- Environmental Management System (EMS)
- Odour Management Plan
- Dust Particulate Management Plan
- Climate Change Risk Assessment (CCRA)
- Noise Management Plan
- Relevant certificate of technical competence (COTC)
- Application forms
  - Part A
  - B2
  - F1
  - Part B4

Ravenswood Environmental Services Limited (RES) has been retained by Roadstone Limited to prepare an Environmental Permit application to authorise the acceptance, treatment, storage and transfer of non-hazardous waste pursuant to the Waste Framework Directive.

### 1.1 Site Setting

The site is located approximately 580m due north of the M20 motorway in Aylesford, Maidstone Kent, ME20 7FG (NGR TQ 71565 59431). Sited between the Strood and Maidstone railway to the east and river Medway immediately to the west, both points almost converging at the southern boundary and in effect isolating the site from access other than from a road bridge (New Hythe Lane) providing access to the site from the north.

Roadstone Limited is located to the extreme east of the wider industrial estate that boasts a variety of industries. Adjoining the site to the north is a large waste treatment facility operated by London Mining Associates. The exact nature of their business is not known but thought not to involve combustible waste.

A search of the Agencies Multi-Agency Geographic Information for the Countryside (MAGIC) confirms that the site is located within 1km of sensitive sites. As such, these ecological receptors are considered throughout this document.

Within the 1km radius search area for sensitive receptors it should be noted that the region forms part of a large-scale mixed industrial and commercial area. (See appendix A for-satellite image of site and its surroundings within a 1km radius.)

There are no schools, care homes, hospitals, or similar sensitive receptors within 1km of the site.

The site is bordered to the immediate east by the river Medway. Adjoining the river Medway to the east is a large sewer treatment facility. The distance between the proposed Roadstone Limited eastern boundary and the sewer treatment plant is approximately 700m. To the northeast, at approximately 135m lies a large solar electricity generation farm.

## 2. Permitted Activities (Proposed)

The operations at the facility may be briefly summarised as follows:

Acceptance of non-hazardous industrial commercial, construction demolition and inert wastes for treatment to recover individual waste types.

Waste shall be treated by sorting and segregation into different components in preparation for further off-site treatment and recovery.

In accordance with the waste hierarchy, Landfill as a means of disposal, shall only be considered where treatment has no further value or proves demonstrably uneconomical, or where emergency situations require disposal as the sole option.

In essence, the primary function of this facility is to prioritise waste streams that are known to contain high quantities of recyclable materials, recovery of the greatest part of each waste type and segregate for onward treatment and processing resulting with the minimal quantity for disposal. Waste types, such as, mixed construction and demolition wastes, and mixed municipal wastes are known to contain high percentages of recyclable materials and are therefore proposed for inclusion within the waste management permit.

It is also proposed to accept inert soil and hardcore for recovery and onward reuse, utilising the appropriate industry protocol to produce a Quality Product that has attained “end of waste” status.

Table 1 presented on the following page sets out the proposed recovery and disposal codes associated to site operations.

Table 1.

Description of specified activity	Limits of specified activity
R3 Recycling/reclamation of organic substances which are not used as solvents	Physical / mechanical treatment including manual and mechanical sorting, separation, screening, baling, shredding, crushing, or compaction of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.
R4 Recycling/reclamation of metals and metal compounds	Subject to any other requirements of this permit waste shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.
R5 Recycling/reclamation of other inorganic materials.	The capacity of the site for non-hazardous waste subject to a R3 activity (Biological treatment only) shall not exceed 75 tonnes per day.
R13 Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	No more than 50 tonnes per day of non-hazardous waste to be treated at the site under D9 activity.
D15 Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Waste types as specified in table 2.1
D9 Physico-chemical treatment	
D14 Repackaging prior to submission to any of the operations numbered D1 – D13.	

## 2.1 Proposed Waste Types and Quantities.

The application applies for a total quantity of waste no more than 200,000 tonnes per year, consisting of 75,000 tonnes of general industrial and commercial wastes and 125,000 tonnes of non-hazardous soil and stone including construction type material containing, bricks, ceramics, glass, concrete and mixed of the same.

## 2.2 Waste Types

Table 1, List of wastes.

Table S2.1 Permitted waste types and quantities for household, commercial and industrial waste transfer station	
Maximum quantity	The total quantity of waste accepted at the site for the above activity shall be less than 200,000 tonnes a year.
Exclusions	wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> <li>• Consisting solely or mainly of dusts, powders or loose fibres</li> <li>• Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	bituminous mixtures, coal tar and tarred products

17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 06	Insulation materials and asbestos – containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-Site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use.
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	Soil and stone



20 02 03	other non-biodegradable wastes
20 03	Other municipal waste
20 03 01	mixed municipal waste

Table S2.1 Permitted waste types and quantities for Physical treatment of non-hazardous waste- General household, commercial and industrial waste	
Exclusions	<p>wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> <li>• Consisting solely or mainly of dusts, powders or loose fibres</li> <li>• Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 01	wood
17 02 03	plastic
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 06	Insulation materials and asbestos – containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for

	example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	Soil and stone
20 02 03	other non-biodegradable wastes
20 03	Other municipal waste
20 03 01	mixed municipal waste

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Table S2.1 Permitted waste types and quantities for Physical treatment of non-hazardous waste- inert soil and hardcore waste	
Exclusions	wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> <li>• Consisting solely or mainly of dusts, powders or loose fibres</li> <li>• Wastes that are in a form which is either sludge or liquid</li> </ul>
Waste code	Description
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
20 02	garden and park wastes (including cemetery waste)
20 02 02	Soil and stone

It is proposed to include EWC 19 12 12 within the list of wastes accepted at the site in recognition of waste emanating from waste transfer stations with minimal treatment capabilities.

19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*
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It is proposed by the operator to add EWC 20 03 01 to the list of wastes because this waste type is known to be recycle rich and widely available.

EWC 20 03 01 consists of the following items:

Paper and cardboard

Wood

Plastic

Film

Mixed metal

Occasional brick pieces and soil

This waste type shall be accepted pursuant to existing Waste Acceptance Procedures which is stated in this document and other supporting documents and segregated in the manner described throughout the supporting management plans. But for the purpose of completeness, a brief description is given here:

Following conformity of the waste and documentation at the weighbridge the vehicle will be directed to the tipping point which is in the location of the waste handling grab. This allows the waste load to be broken for visual inspection and large recyclates to be removed mechanically and the remainder manually sorted into individual waste types.

The treatment consists of:

Manual pre-sorting to remove waste types such as cardboard, paper, wood and metal. Then the waste will pass through a screener to segregate hardcore type material and soil leaving the smaller fractions of wood, metal and those items that have no further use.

The potential for odour release from this waste type has been identified and controls established in the Odour Management Plan submitted in support of the permit application.

Once segregated, individual waste types recovered from EWC 20 03 01 are stored locally in bays awaiting transport from site. The manner in which the waste is stored, location and duration on site is mentioned in the Fire Prevention Plan

Table 2.2 Permitted waste types and quantities for construction and demolition wastes

17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	Glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones

### 3. Management Systems

The site, its operations in respect of waste acceptance, treatment and transfer shall be conducted pursuant to the requirements of “The Environmental Protection (Duty of Care) Regulations 1994. Which imposes upon the permit holder:

*“Section 34(1) of the Environmental Protection Act 1990 imposes a duty of care on any person who imports, produces, carries, keeps, treats or disposes of controlled waste or, as a broker, has control of such waste. The duty requires such persons to ensure that there is no unauthorised or harmful deposit, treatment or disposal of the waste, to prevent the escape of the waste from their control or that of any other person, and on the transfer of the waste to ensure that the transfer is only to an authorised person or to a person for authorised transport purposes and that a written description of the waste is also transferred”.<sup>(1)</sup>*

<sup>(1)</sup> The Environmental Protection (Duty of Care) Regulations 1991

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment including the health and safety of staff.

The site will be operated in accordance with a management system which will ensure that:

- ☐ the risks that the activities pose to the environment are identified;
- ☐ the measures that are required to minimise the risks are identified;
- ☐ the activities are managed in accordance with the management system;
- ☐ performance against the management system is audited at regular intervals; and
- ☐ compliance with the Environmental Permit is complied with.

Other site personnel will include administrative staff and site operatives. All personnel will have access to a copy of the Environmental Permit and pertinent management plans.

#### 4. Technical Standards

The technical standards and measures that are necessary to ensure the site does not give rise to significant environmental impact have been determined through the risk assessment process and are summarised below:

- ☐ Strict waste acceptance procedures will be implemented to prevent the acceptance of hazardous waste;
- ☐ All potentially polluting liquids will be stored in vessels with secondary containment;
- ☐ Measures will be taken to control emissions of noise by use of suitably silenced and maintained items of plant;
- ☐ Operations will only be undertaken during the hours authorised by the planning consent;
- ☐ Measures will be implemented to control fugitive emissions of dust through the use of water sprays;
- ☐ A hard surfaced access road will prevent the transport of mud onto the adjacent highway;
- ☐ The site will be engineered with an impermeable concrete base with a sealed drainage system
- ☐ A comprehensive programme of operational monitoring will be implemented to include noise, fugitive emissions, mud and litter.

## 5. Risk Assessments

A number of risk assessments have been prepared in order to demonstrate that the proposed development will not give rise to unacceptable environmental impact.

### 5.1 Environmental Risk Assessment (ERA)

An environmental risk assessment (ERA) has been undertaken to assess the risks from the following:

- ☐ Odour;
- ☐ Noise
- ☐ Dust;
- ☐ Fire Prevention
- ☐ Climate Change
- ☐ Pests, Litter & mud;
- ☐ Accidents.

The key areas of risk to the environment and human health associated with the proposed operations will be odour and fugitive emissions of dust. However, given the nature of the site setting and the management procedures in place, the overall risk for each assessed hazard was deemed to be low or not significant.

The ERA indicates that there will be a tolerable risk to the environment and to human health for all of the risk areas examined.

Application of the risk management and control strategies will ensure that the facility is operated without detriment to the local environment or to human health.

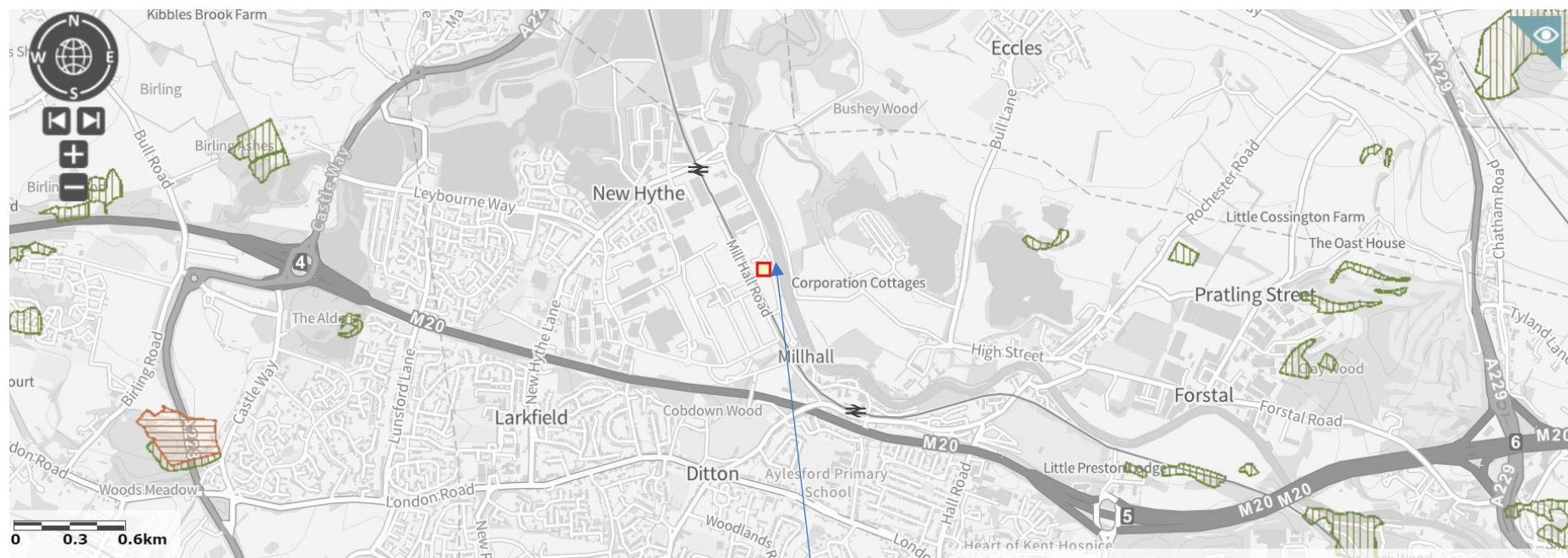
## 6. Conclusion

In view of the foregoing, it is concluded that the proposed development of Roadstone waste management facility will not give rise to an unacceptable impact on human health or the environment, and accordingly an Environmental Permit should be granted which authorises the proposed operations.



## APPENDIX A

### Site Location

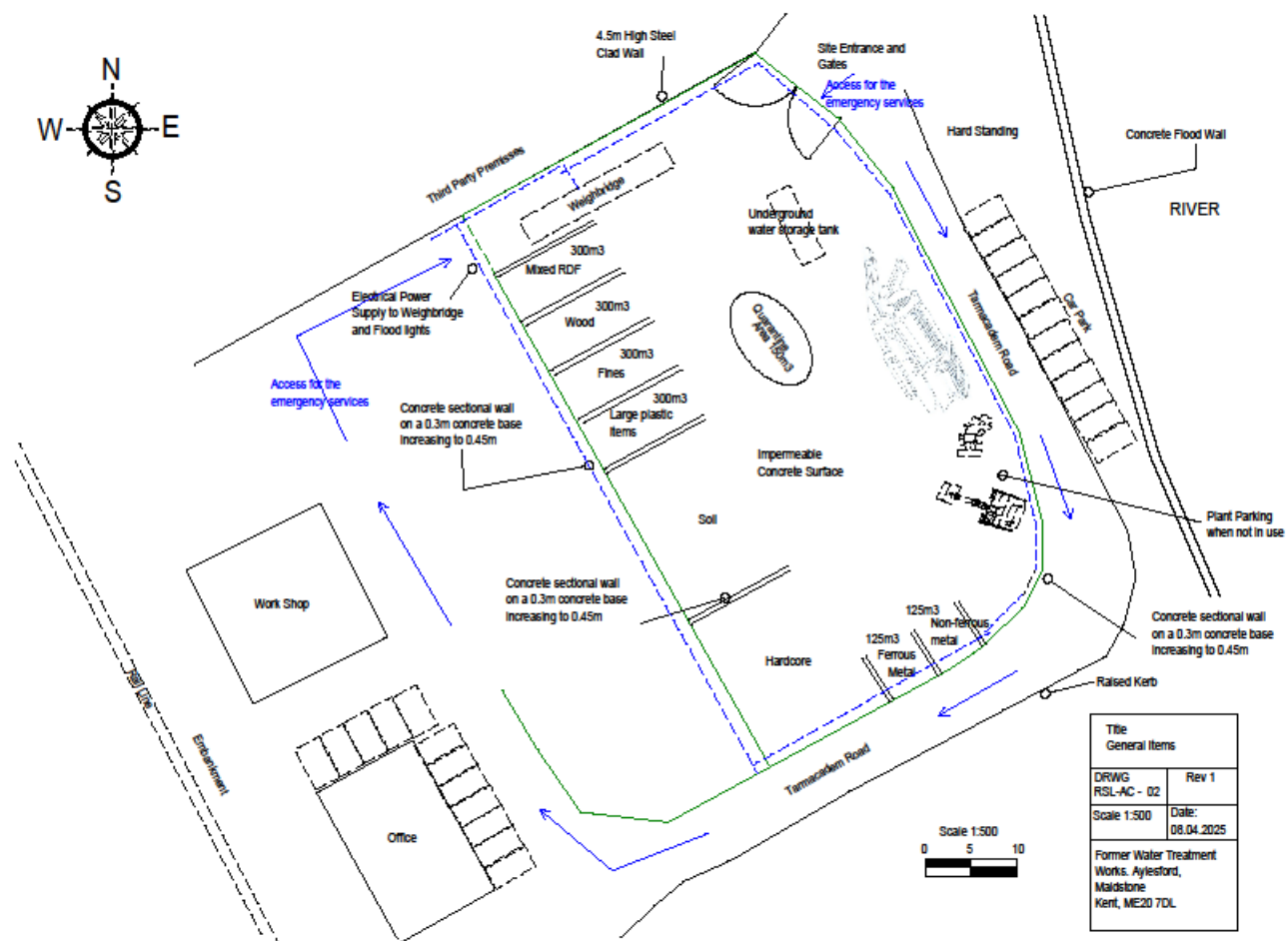


Roadstone Limited



## APPENDIX B

## Site Layout Plan





Ravenswood Environmental Services Limited  
Terms and Conditions

This report has been prepared using all diligence and skill, care, and attention to detail, and taking into account data collected and has been accepted in good faith as being accurate and valid.

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