



# Site Condition Report

## Kemsley Fields Environmental Permit Variation Application

### Countrystyle Recycling Limited

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## Basis of Report

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## 1.0 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) Ref: (EPR/XP3298HV) issued under the Environmental Permitting (England and Wales) Regulations (as amended) 2016 for the Kemsley Fields Business Park Materials Recycling Facility (MRF) site located at Kemsley Fields Business Park, Ridham Dock Road, Iwade, Sittingbourne, Kent, ME9 8SR.

The site currently operates under a bespoke EP (Ref: EPR/XP3298HV) originally issued by the EA on the 27<sup>th</sup> November 2006. The EP has been varied multiple times since issue and was most recently varied and consolidated in May 2021.

This EP variation seeks to make the following changes to the EP:

- Regularisation of the EP boundary;
- Addition of clinical waste transfer station (WTS) activity, including the storage of sharps and Absorbent Hygiene Products (AHPs) (offensive waste);
- Addition of further RDF baling operation, and associated plant;
- Storage of metal, glass, and hazardous glass waste in external storage bays;
- Acceptance, storage and bulking up of street sweepings;
- Food waste storage within the decommissioned composting bio filter; and
- Addition of EWC codes.

CRL propose to regularise the EP boundary to include an area of land to the west of the existing EP boundary which is currently regulated under the adjacent gypsum facility's EP. The adjacent gypsum facility is also owned and operated by CRL but is regulated under a separate EP (Ref: EPR/DB3606LE). The additional area of land to be included within the EP is located to the west of the RDF building, and to the east of the gypsum building, on the neighbouring site. The proposed regularised EP boundary is illustrated on Drawing 02 Site Layout and Waste Storage.

As a result of the EP boundary extension the Site Condition Report (SCR) has been updated in accordance with the EA's H5 Guidance Note on SCR<sup>1</sup>. The updated SCR aims to record and describe the condition of the land (including the additional extension area) at the site prior to the commencement of any operations. The SCR will capture the conditions of the site at the start of the EP, and prior to the commencement of waste operations within the extension area.

This will provide a point of reference and baseline environmental data so that when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the proposed operations and ensure that the condition of the land is in a 'satisfactory state' on surrender of the EP.

The location of the site is illustrated on Drawing 01, the EP Boundary and Site Layout on Drawing 02, and the Environmental Site Setting is shown on Drawings 03 and 04.

Sections 1 to 3 of the EA's SCR template have been completed within this document and comprise the following aspects:

- Site details;

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<sup>1</sup> Environment Agency – H5 Site Condition Report – guidance and templates, Version 3.0, April 2013



- Condition of the land at permit issue;
  - Geology;
  - Hydrology;
  - Hydrogeology;
  - Pollution history; and
  - Evidence of historic contamination.
- Permitted activities.

Sections 4 to 7 of the SCR template should be maintained during the life of the permit, and as such have been updated to reflect this EP variation application, and the EP boundary extension.

Sections 8 to 10 will be completed and submitted in support of the application to surrender the EP.

## 1.1 Site Location

The site is located approximately 2km east of Iwade in Sittingbourne, Kent. The site is accessed from Ridham Dock Road, situated approximately 1km south of Ridham Dock. The National Grid Reference (NGR) for the site is TQ 91957 67456 and the site location is illustrated on Drawing 01. The indicative site layout and EP boundary is illustrated on Drawing 02.

The site is bounded to the west by a gypsum facility owned and operated by CRL, which is subject to an EP (Ref: EPR/DB3606LE), issued 21<sup>st</sup> December 2016 for the treatment and storage of gypsum waste. The Swale, a multi designated European and national site, lies 10m to the east and open land lies immediately to the north and south.

Table 1-1 below summarises the surrounding land uses.

**Table 1-1 Surrounding Land Uses**

Boundary	Description
North	Open land, and surface water features including drains and inlets from The Swale. Beyond this lies a pathway/track, followed by a commercial/industrial area.
East	The Swale and the Isle of Sheppey, followed by the Elmley National Nature Reserve.
South	Open land, and surface water features including drains and inlets from The Swale. This is followed by a Waste Water Treatment Works, and further commercial/industrial premises.
West	CRL's separately permitted gypsum treatment and storage facility lies immediately to the west, followed by Ridham Dock. Beyond this lies industrial units, Cold Harbour Marshes and the A249.



## 2.0 Site Condition Report H5 Template

1.0 SITE DETAILS	
Name of the Applicant	Countrystyle Recycling Limited
Activity Address	Kemsley Fields Business Park, Ridham Dock Road, Iwade, Sittingbourne, Kent, ME9 8SR
National Grid Reference	TQ 91957 67456
Document reference and dates for Site Condition Report at permit application and surrender	Bespoke Environmental Permit Application Site Condition Report – (reference: 416.01376.00027/SCR), August 2016.  Environmental Permit Variation Application Site Condition Report (reference: 402.065070.00001/SCR), September 2024 (this application)
Document references for site plans (including location and boundaries)	<ul style="list-style-type: none"> <li>• Drawing 01 Site Location Plan</li> <li>• Drawing 02 Site Layout and Waste Storage</li> <li>• Drawing 03 Local Receptors</li> <li>• Drawing 04 Natural and Cultural Heritage</li> </ul>

**Note:**

In Part A of the application form you must give us details of the site’s location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.



<b>2.0      CONDITION OF THE LAND AT PERMIT ISSUE</b>	
<p>Environmental Setting Including:</p> <ul style="list-style-type: none"> <li>• Geology</li> <li>• Hydrogeology</li> <li>• Surface waters</li> </ul>	<p><b>2.1.1      Geology</b></p> <p>The British Geological Survey<sup>2</sup> GeoIndex (onshore) Map confirms that the site is underlain by superficial alluvium deposits (clay, silt, sand).</p> <p>The bedrock beneath the site comprises London Clay (clay and silt).</p> <p><b>2.1.2      Hydrogeology</b></p> <p><b>2.1.2.1    Aquifers</b></p> <p>EA mapping indicates that the chalk bedrock deposit beneath the site is not designated as an aquifer, while the superficial deposits are designated as a Secondary (undifferentiated) aquifer.</p> <p><b>2.1.2.2    Groundwater Vulnerability</b></p> <p>The site lies within an area of ‘medium-low’ groundwater vulnerability.</p> <p><b>2.1.2.3    Source Protection Zone</b></p> <p>Mapping provided by the EA<sup>3</sup> indicates that the site lies outside of any Groundwater Source Protection Zones (SPZ).</p> <p><b>2.1.3      Hydrology</b></p> <p>There are no hydrological features located within the site boundary.</p> <p>The Swale (a designated main river) is located approximately 10m to the east. The Swale flows in a largely north-westerly direction to its confluence with the River Medway, at Queenborough, north-east of the site. The Swale is tidally influenced within the vicinity of the Site. The Ridham Wall flood defence, which lines the western banks of the Swale, borders the eastern boundary of the site.</p> <p>Numerous drains and inlets from The Swale are located in all directions. The closest is adjacent to the site to the south.</p>

<sup>2</sup> [BGS maps portal - British Geological Survey](https://maps.bgs.ac.uk/), accessed September 2024

<sup>3</sup> [https://maps.environment-agency.gov.uk](https://maps.environment-agency.gov.uk/), accessed September 2024



	<p>The Coldharbour Marshes are located approximately 100m to the west and Kemsley Marshes are located 300m south of the site boundary.</p> <p>A number of treatment lagoons and other processing facilities associated with the waste water treatment works are located 50m south of the site.</p> <p>The EA's Flood Map for Planning<sup>4</sup> confirms that the site is situated within a high risk area of flooding (zones 2 and 3). The majority of the site lies within Flood Zone 3, with an isolated 'spot' located within Flood Zone 2. This does however ignore the presence of flood defences. EA information confirms that the site is adequately defended from a present day 0.5% annual exceedance probability (AEP) tidal flood event, albeit the standard of protection offered by the defences reduces over the lifetime of the development owing to climate change effects (sea level rise).</p> <p>The principal flood risk to the site is a residual risk resulting from a significant breach (failure) within the tidal flood defences lining the banks of The Swale. The significant breach would also need to coincide with significant flood levels, which represents a highly unlikely event.</p>
<p>Pollution History Including:</p> <ul style="list-style-type: none"> <li>• Pollution incidents that may have affected land</li> <li>• Historical land-uses and associated contaminants</li> <li>• Any visual/olfactory evidence of existing contamination</li> <li>• Evidence of damage to pollution prevention measures</li> </ul>	<p><b>2.1.4 Pollution History</b></p> <p>There have been no recorded pollution incidents within the boundary of the site.</p> <p>There are six recorded pollution incidents within a 1km radius of the site. These include pollution to land, water and air as follows:</p> <ul style="list-style-type: none"> <li>• August 2015 - significant impact to land (specific Waste Material) approximately 200m to the north;</li> <li>• August 2005 – significant impact to water (contaminated water) approximately 215m to the south;</li> <li>• Two entries for August 2004 – significant impact to air (contaminated water and atmospheric pollution) approximately 830m to the north;</li> <li>• April 2003 – significant impact to water (contaminated water) approximately 900m to the north and;</li> <li>• May 2014 – significant impact to water (contaminated water) approximately 900m to the north.</li> </ul>

<sup>4</sup> [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/flood-map-for-planning.service.gov.uk), accessed September 2024





	<p><b>2.1.5 Historical Land Uses</b></p> <p>EA mapping shows the following historic land uses within the boundary and 1km of the site:</p> <p>The north and south west corners of the site boundary are within one of the two areas of the historic Kemsley Marshes inert landfill. The second inert landfill area is located externally of the boundary to the north west of the site.</p> <p>The historic inert North Kemsley Landfill is located approximately 500m to the south east.</p> <p>The historic and permitted areas of Kemsley Mill Landfill are located approximately 720m to the south east. The historic landfill accepted sludges / liquids, household, commercial and inert wastes. The permitted section of landfill (authorised under Environmental Permit EA/EPR/EB3131RU/V003) is classified as an A7 Landfill Site accepting industrial waste (factory curtilage).</p> <p>The proposed additional area of land to be included within the EP boundary, is currently regulated under the adjacent gypsum facility's EP (Ref: EPR/DB3606LE) also operated by CRL. The proposed extension area was not used by CRL for waste storage or treatment operations on the gypsum facility and consists of the weighbridge only. An application to surrender the strip of land from the gypsum facility EP is currently being assessed by the EA.</p> <p>All of the above represent potentially contaminative former land uses in the locality of the site.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>N/A – there are no additional summary reports.</p> <p>Details of historic use and potentially polluting activities are given above.</p>
<p>Baseline soil and groundwater reference data</p>	<p>N/A – there are no additional summary reports.</p> <p>Details of soil, groundwater and potentially polluting activities are given above.</p>
<p><b>Supporting information</b></p>	<ul style="list-style-type: none"> <li>• Source information identifying environmental setting and pollution incidents</li> <li>• Historical Ordnance Survey plans</li> <li>• Site reconnaissance</li> <li>• Historical investigation / assessment / remediation / verification reports</li> </ul>



	<ul style="list-style-type: none"> <li>• Baseline soil and groundwater reference data</li> </ul>
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<b>3.0 PERMITTED ACTIVITIES</b>	
Permitted Activities	<p>Activities at the site will continue to be regulated under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.</p> <p>The EP currently allows for the following operations to be undertaken as detailed in Table S1.1 of the EP:</p> <ul style="list-style-type: none"> <li>• <b>A1:</b> Dry mixed recyclables MRF;</li> <li>• <b>A2:</b> Refuse Derived Fuel (RDF) Production;</li> <li>• <b>A3:</b> Non-Hazardous transfer and treatment operations;</li> <li>• <b>A4:</b> Hazardous waste transfer operations including storage and transfer of WEEE and End-of-Life Vehicles and batteries;</li> <li>• <b>A5:</b> Green waste transfer operations;</li> <li>• <b>A6:</b> Food and co-mingled food/green waste transfer operations<sup>5</sup>;</li> <li>• <b>A7:</b> Aqueous water and collection storage;</li> <li>• <b>A8:</b> Surface water and collection storage.</li> </ul> <p>The following Recovery and Disposal Codes as set out in the Waste Framework Directive (WFD) are considered appropriate to describe the activities:</p> <ul style="list-style-type: none"> <li>• <b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents;</li> <li>• <b>R4:</b> Recycling/ reclamation of metals and metal compounds</li> <li>• <b>R5:</b> Recycling/reclamation of other inorganic materials;</li> <li>• <b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on site where it is produced);</li> <li>• <b>D14:</b> Repackaging prior to submission to any of the operations numbered D1 to D13 and;</li> <li>• <b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).</li> </ul> <p>The site will continue to accept up to 245,000 tonnes per annum (tpa) in total. Waste quantities are currently detailed within Schedule 2 of the EP. There is no proposed change to</p>

<sup>5</sup> The co-mingled food/green waste operation is anticipated to cease by the end of 2024 a 'Simpler Recycling' is introduced.



	the existing total tonnage as a result of this EP variation application.
Non-Permitted Activities Undertaken	N/A - There are no non-permitted activities are undertaken on site.
Document references for: <ul style="list-style-type: none"> <li>Plan showing activity layout; and</li> <li>Environmental risk assessment.</li> </ul>	<p>Drawing 01 – Site Location Plan</p> <p>Drawing 02 – Site Layout and Waste Storage</p> <p>Environmental Risk Assessment, SLR Consulting Limited (prepared in support of Bespoke EP Variation Application) (Reference: 402.065070.00001/SCR), dated April 2024.</p>

**Note:**

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (Environmental Risk Assessment - EPR H1) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as ‘dangerous’ under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

<b>4.0 CHANGES TO THE ACTIVITY</b>	
Have there been any changes to the activity boundary?	This EP variation application seeks to regularise the EP boundary to include an area of land to the west of the existing EP boundary which is currently regulated under the adjacent gypsum facility’s EP, which is also operated by CRL. The area of land to be included within the EP is located to the west of the RDF building, and to the east of the gypsum building, on the neighbouring site. The proposed regularised EP boundary is illustrated on Drawing 02 Site Layout and Waste Storage.
Have there been any changes to the permitted activities?	The site operates under a bespoke EP (EA Ref: EPR/XP3298HV) originally issued by the EA on 27 <sup>th</sup> November 2006. The EP has been varied multiple times



	<p>since issue and was most recently varied and consolidated in May 2021.</p> <p>This EP variation application seeks to make the following changes to the EP:</p> <ul style="list-style-type: none"> <li>• Regularisation of the EP boundary;</li> <li>• Addition of a clinical WTS activity, including the storage of sharps and Absorbent Hygiene Products (AHPs) (offensive waste);</li> <li>• Addition of a further RDF baling operation, and associated plant;</li> <li>• Storage of metal, glass, and hazardous glass waste in external storage bays;</li> <li>• Acceptance, storage and bulking up of street sweepings;</li> <li>• Food waste storage within the decommissioned composting bio filter; and</li> <li>• Addition of EWC codes.</li> </ul> <p>CRL propose to increase the maximum quantity of waste accepted as part of activity A2 (RDF production), as detailed in Table S2.3 of the EP from 160,000 to 180,000 tpa. There is no change proposed to the existing total annual tonnage (240,000 tpa) as a result of the EP variation application.</p>
<p>Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?</p>	<p>N/A – no change as a result of this EP variation.</p>
<p>Checklist of supporting information</p>	<p>N/A</p>



## 5.0 MEASURES TAKEN TO PROTECT LAND

A number of measures have been taken at the site to protect the land and these can be summarised as follows:

- All waste received at the site is inspected on receipt to confirm its' description and composition through the implementation of the strict waste acceptance procedure;
- Only waste authorised by the EP is accepted at the site;
- Waste storage and treatment will continue to take place on impermeable surfacing. The site surfacing and drainage system is inspected routinely to ensure the continued integrity and performance of the surfacing and drains. The surfacing is maintained as required to ensure that it remains even, not be subject to rutting by vehicles even when wet, have sufficient durability to allow cleaning, for example by scraping, and remain free of standing water;
- Food waste will be stored in the sealed, decommissioned composting biofilter, and the additional offensive waste types will be stored within designated bays in a building. This will prevent the generation of run off;
- Street sweepings and hazardous glass waste will be stored within bays 1 and 2 respectively. Each bay will be fully sealed and covered with tarpaulin to minimise the likelihood of generation of run off. Any run off that is produced would be contained, and collected within the respective bays prior to removal from site along with the waste; and
- Tanks used for the storage of fuel and maintenance oil, will continue to be constructed so that any leaks/spillages will be contained. Tanks are surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest tank within the bund or 25% of the total tank volume within the bund, whichever is the greater. Storage tanks are constructed to the appropriate British Standard.

Checklist of supporting information

- Inspection records and summary of findings of inspections for all pollution prevention measures
- Records of maintenance, repair and replacement of pollution prevention measures



<b>6.0 POLLUTION INCIDENTS THAT MAY HAVE HAD AN IMPACT ON LAND AND THEIR REMEDIATION</b>	
There have been no recorded pollution incidents on site during the lifetime of the EP and therefore there has been no impact on the land.	
Checklist of supporting information	<ul style="list-style-type: none"> <li>• Records of pollution incidents that may have impacted on land</li> <li>• Records of their investigation and remediation</li> </ul>

<b>7.0 SOIL, GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)</b>	
There is no requirement in the current EP for ongoing soil, gas and water quality monitoring.	
<ul style="list-style-type: none"> <li>• Description of soil gas and/or water monitoring undertaken</li> <li>• Monitoring results (including graphs)</li> </ul>	

Sections 8 to 10 will be completed and submitted in support of an application to surrender the EP.



