



Non-Technical Summary

Kemsley Fields Environmental Permit Variation Application

Countrystyle Recycling Limited

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Basis of Report

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Table of Contents

Basis of Report	i
1.0 Introduction	1
1.1 The Site.....	1
1.2 Current EP	2
2.0 Overview of Proposed Variation.....	3
2.1 EP Boundary Regularisation	3
2.2 Clinical WTS Activity	3
2.3 RDF Baling Operation	4
2.4 Metal, Glass and Hazardous Glass Waste Storage	4
2.5 Street Sweepings	5
2.6 Food Waste Storage	5
2.7 Addition of EWC Codes.....	5
3.0 Application Contents	8
3.1 Application Forms.....	8
3.2 Type of Variation Application and EA Fee	8
3.3 Operating Techniques	8
3.4 Environmental (Amenity) Risk Assessment	9
3.5 Fire Prevention Plan.....	9
3.6 Odour Management Plan	9
3.7 Associated Drawings.....	9
4.0 Technical Standards and Control Measures	10

Tables in Text

Table 1-1 Surrounding Land Uses.....	1
Table 2-1 EP Table S1.1 Proposed Additional Waste Activity	4
Table 2-2 Proposed Additional EWC Codes for Clinical WTS Activity	5
Table 2-3 Proposed Additional EWC Codes.....	7

Drawings

- Drawing 01 Site Location Plan
- Drawing 02 Site Layout and Waste Storage
- Drawing 03 Local Receptors
- Drawing 04 Natural and Cultural Heritage



1.0 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) (Ref: 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.

This document provides a Non-Technical Summary (NTS) of the proposed variation, including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this application for an EP variation, the following documentation is submitted in addition to this NTS:

- EA Application forms, (Parts A, C2, C4, and F1);
- Operating Techniques (OT);
- Environmental (Amenity) Risk Assessment (ERA);
- Fire Prevention Plan (FPP);
- Odour Management Plan (OMP); and
- Associated Drawings.

1.1 The Site

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 21st 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.



1.2 Current EP

Kemsley Fields Business Park is CRL's main site at Ridham. The site operates under a bespoke EP (EA Ref: EPR/XP3298HV) originally issued by the EA on 27th November 2006. The EP has been varied multiple times since issue, and was most recently varied and consolidated in May 2021. The current EP allows for the following operations to be undertaken, as detailed in Table S1.1 of the EP:

- **A1** – Dry mixed recyclables MRF;
- **A2** – Refuse Derived Fuel (RDF) Production;
- **A3** – Non-hazardous transfer and treatment operations;
- **A4** – Hazardous waste transfer operations including storage and transfer of WEEE and End-of-Life Vehicles and batteries;
- **A5** – Green waste transfer operations;
- **A6** – Food and co-mingled food/green waste transfer operations¹;
- **A7** – Aqueous liquid storage; and
- **A8** – Surface water and collection storage.

The permitted annual tonnage is 245,000 tonnes per annum (tpa).

¹ The co-mingled food/green waste operation is anticipated to cease by the end of 2024 as 'Simpler Recycling' is introduced.



2.0 Overview of Proposed Variation

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

- Regularisation of the EP boundary;
- Addition of a clinical waste transfer station (WTS) activity, including the storage of sharps and Absorbent Hygiene Products (AHPs) (offensive waste);
- Addition of a 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 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 tpa, 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.

2.1 EP Boundary Regularisation

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 owned and operated by CRL but is regulated under a separate EP (Ref: EPR/DB3606LE). 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.

2.2 Clinical WTS Activity

CRL propose to vary Table S1.1 of the EP to add a clinical WTS activity as summarised in Table 2-1 below to allow the acceptance, storage, and bulking up of AHPs and sharps (offensive waste) on site. There will be no treatment of offensive waste on site, and the waste will be stored within designated bays 7a and 7b, inside the existing C & D / C & I MRF building as illustrated on Drawing 02. The MRF building benefits from impermeable surfacing and a sealed drainage system throughout.

A maximum of 20,000 tonnes per annum (tpa) of offensive waste will be accepted at the site, with a maximum of 100 tonnes stored on site at any one time. Offensive waste will be stored for a maximum of 14 days (usually 72 hours).

Offensive/clinical waste will be stored and handled and stored as described in the site's OT document and in accordance with the EA's Guidance "*Healthcare waste: appropriate measures for permitted facilities*"².

² [Healthcare waste: appropriate measures for permitted facilities - Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities), accessed November 2023



Table 2-1 EP Table S1.1 Proposed Additional Waste Activity

Activity Reference	Description of activities for waste operations	Limits of activities
<p>A9 Clinical WTS</p>	<p>R3: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection on the site where the waste is produced)</p>	<p>The amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes.</p> <p>Waste shall be stored on impermeable surfacing with sealed drainage.</p> <p>Infectious clinical waste and non-infectious clinical offensive waste shall be stored for no longer than 14 days.</p> <p>Odorous or biodegradable waste must be stored securely for no longer than 14 days.</p>

To facilitate the addition of the clinical WTS operation, the following changes to the site layout, and EP are proposed:

- Change to site layout to include waste storage bays 7a and 7b for offensive/clinical waste within the existing C & D / C & I MRF building; and
- Addition of EWC codes as described in Section 2.6 below.

2.3 RDF Baling Operation

The site’s existing RDF baling operation takes place within the DMR MRF building. CRL propose to add a further RDF baling operation and associated plant. The additional RDF baling operation and plant will be located under a canopy outside of the DMR MRF building, immediately to the west.

All material storage, and processing will continue to be undertaken on impermeable surfacing with sealed drainage. The location of the external baling activity and baling equipment is illustrated on Drawing 02.

2.4 Metal, Glass and Hazardous Glass Waste Storage

CRL stores metal and glass arising from its’ operations on site (primarily the production of RDF bales and plasterboard recycling operations), and externally accepted metals and glass prior to transfer off site for onward recycling.

CRL propose to vary the site layout to utilise bays 1, 2, 3, 4, and 5 in the north western area of the site to flexibly store various grades of scrap metal waste and glass externally. The storage bays are separated by concrete blocks and/or frames.

CRL propose to accept source segregated, single stream, hazardous glass waste under EWC code 19 12 11* for storage and bulking up only. There would be no treatment of hazardous glass on site. When accepted, hazardous glass waste would be stored within Bay 2 which will be fully sealed and covered with tarpaulin to minimise the generation of run off. Any run off arising would be contained, and collected within the bay prior to removal from site along with the glass waste. The proposed site layout is illustrated on Drawing 02.



2.5 Street Sweepings

CRL propose to accept street sweepings (20 03 03 Street Cleaning Residues) from across Kent for storage and bulking up only. There is no proposed treatment of street sweepings. When accepted, street sweepings will be deposited within Bay 1 in the flexible north western area of the site as illustrated on Drawing 02. The bay will be fully sealed and covered with tarpaulin to minimise the likelihood of the generation of run off. Any potentially contaminated process water arising from this waste would be fully contained within the bay, and wholly removed from site along with the street sweepings upon bay emptying. No more than 150 tonnes of street sweepings will be stored on site at any one time, and the waste will typically be stored for 24 hours (maximum 3 days). The bay will be fully emptied, and cleaned before further street sweepings are accepted. As Bay 1 is part of flexible storage on site, should the bay be required for alternative permitted wastes (metals, glass etc) then a full bay clean will be carried out and any liquid wash down arising would be sucked up and removed from site to a suitable facility for further treatment or disposal. When removed from site, street sweepings will typically be transported to Veolia at Pitsea or other suitably permitted facilities for further recovery/disposal.

The proposed site layout is illustrated on Drawing 02.

2.6 Food Waste Storage

CRL propose to repurpose the decommissioned composting bio filter to provide an additional covered storage area for food waste, as illustrated on Drawing 02.

The current sites accepts up to 15,000 tpa of food waste for storage in a dedicated bay within the main RDF building before being transferred off site to a suitably licenced facility. The additional food waste storage area will not change the existing total annual tonnage, and food waste will continue to be accepted and stored, prior to export to an alternative suitably permitted facility. There will continue to be no treatment of food waste on site.

The proposed site layout, including the additional food waste storage area is shown on Drawing 02.

2.7 Addition of EWC Codes

It is proposed that the following additional EWC codes detailed in Table 2-2 below, are added to the site's EP in relation to the proposed clinical WTS activity. The additional EWC codes will be accepted for storage and bulking up only.

Table 2-2 Proposed Additional EWC Codes for Clinical WTS Activity

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 01*	Water-based developer and activator solutions ³
09 01 02*	Water-based offset plate developer solutions ³
09 01 03*	Solvent based developer solutions ³
09 01 04*	Fixer solutions ³
09 01 05*	Bleach and bleach fixer solutions ³

³ This is limited to wastes of this type arising from medical practices or associated research activities.



EWC Code	Description
09 01 07	Photographic film and paper containing silver or silver compounds ³
09 01 08	Photographic film and paper free of silver or silver compounds ³
18	WASTES FROM HUMAN OR ANIMAL HEALTHCARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	Sharps (except 18 01 03)
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection (e.g. dressings, plaster casts, linen, disposable clothing, nappies)
18 01 04	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 01 06*	Chemicals consisting of or containing hazardous substances
18 01 07	Chemicals other than those mentioned in 18 01 06
18 01 08*	Cytotoxic and cytostatic medicines
18 01 09	Medicines other than those mentioned in 18 01 08
18 01 10*	Amalgam waste from dental care
18 02	Wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	Sharps (except 18 02 02)
18 02 02*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05*	Chemicals consisting of or containing hazardous substances
18 02 06	Chemicals other than those mentioned in 18 02 05
18 02 07*	Cytotoxic and cytostatic medicines
18 02 08	Medicines other than those mentioned in 18 02 07
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 31*	Cytotoxic and cytostatic medicines
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 99	Other fractions not otherwise specified (consisting of nappies and absorbent hygiene products (AHPs) only)



CRL also propose to add the following EWC codes detailed in Table 2-3 below, for storage and bulking up only.

Table 2-3 Proposed Additional EWC Codes for Bulking Up Only

EWC Code	Description
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 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 03	Other municipal wastes
20 03 03	Street-cleaning residues



3.0 Application Contents

3.1 Application Forms

Parts A, C2, C4, and F1 of the EA's EP variation application forms have been completed by CRL in support of this variation application.

3.2 Type of Variation Application and EA Fee

It is considered that this EP variation application constitutes a Normal Variation of the Material Recycling Facility activity, and an application for a Clinical WTS Activity. As such, the following charges apply, in accordance with the EA's Environmental Permitting and Abstraction Licensing (England) Charging Scheme 2022⁴:

- 1.16.11 - Normal variation: Material Recycling Facility (full normal variation application fee): **£3,965**;
- 1.16.7 - New application: Clinical WTS (50% of application costs for second activity): **£3,965**;
- Habitats Assessment - **£779**;
- Fire Prevention Plan - **£1,241**;
- Odour Management Plan - **£1,246**.

Therefore, the total fee for the variation application is **£11,196**.

3.3 Operating Techniques

The currently approved OT document has been amended, and updated to include the proposed changes associated with this EP variation application. The OT details the management measures that are implemented at the facility to minimise the risk of accidents or emissions that could impact site operatives, local receptors and the environment.

The document includes the following information:

- Management;
- Site operations;
- Process controls;
- Emissions; and
- Information.

Operational management procedures 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 and the OT;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

⁴ [The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/103114/epalcs2022.pdf)



This NTS should be read in conjunction with the OT.

3.4 Environmental (Amenity) Risk Assessment

The ERA has been prepared to consider the environmental risk proposed by the EP variation application.

Strict operational procedures will continue to be implemented at the site to monitor and manage amenity risks from the activities and include provisions for the monitoring of scavenging birds, vermin, insects and litter, mud on road, odour and noise. The impact of the proposed EP variation is assessed in the ERA. Potential receptors are illustrated on Drawing 03 and 04.

Subject to the continued implementation of the stated management measures, the conclusion has been reached that the proposed EP variation is unlikely to result in a significant accident risk or risk to the amenity of the local environment.

3.5 Fire Prevention Plan

Current EA guidance regarding FPPs⁵ requires any operator who stores combustible waste to have an approved FPP in place. CRL have updated the previously accepted FPP to reflect the changes proposed in this variation application.

The information contained within the FPP for the facility aims to meet the following 3 main objectives:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

3.6 Odour Management Plan

The site currently operates in accordance with the existing Odour Management Plan (OMP). CRL have updated the OMP to reflect the changes proposed as part of this EP variation. The OMP aims to ensure that the EP is complied with through the identification of all potential odour sources, pathways, and receptors. The OMP also details information regarding monitoring, investigations, and reporting of odour emissions from site and management for the control of emissions.

3.7 Associated Drawings

The following drawings have been prepared to support the EP variation application, and to illustrate the changes to the site layout:

- Drawing 01 Site Location Plan
- Drawing 02 Site Layout and Waste Storage
- Drawing 03 Local Receptors
- Drawing 04 Natural and Cultural Heritage

⁵ [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits), last updated January 2021



4.0 Technical Standards and Control Measures

The key technical standards laid out in this NTS will continue to govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- EA Guidance, Risk assessments for your environmental permit, updated 31st August 2022;
- EA Guidance, Control and Monitor Emissions from your EP, November 2022;
- EA Guidance, Developing a Management System: Environmental Permits, April 2023;
- Sector Guidance Note S5.06; Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste (October 2018);
- EA Guidance, Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities, August 2023;
- EA Guidance, Healthcare Waste: Appropriate Measures for Permitted Facilities, December 2021; and
- Relevant EA Guidance e.g. Environmental Risk Assessments, Fire Prevention Plans, etc...

The site will continue to be managed and operated in accordance with CRL's Environmental Management System (EMS).

The control measures relevant to the proposed activities are described in the updated OT document submitted with this EP variation application.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed EP variation application at Kemsley Fields Business Park.

CRL is fully committed to ensuring the highest standards are met and will continue to undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's Environmental Policy, EMS, and associated procedures.



