



Non-Technical Summary

Morgan Sindall Woodchip Storage Facility

Countrystyle Recycling Limited

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Basis of Report

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1.0 Introduction

1.1 Overview of Document

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for the storage of woodchip at Morgan Sindall Woodchip Storage Facility, Ridham Dock, Sittingbourne, Kent, ME9 8SR (the Site) under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.

This document provides a Non-Technical Summary (NTS) of the EP application 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 application.

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

- EA Application Forms (Parts A, B2, B4 and F1);
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT);
- Fire Prevention Plan (FPP);
- Site Condition Report (SCR);
- Dust Management Plan (DMP);
- Environmental Management System (EMS) Summary; and
- Associated Drawings.

It is considered that due to the nature of the waste operations to be undertaken at the Site that an odour management plan, pest management plan and a noise management plan are not required for this application.

1.2 The Site

The Site is located at Ridham Docks, Sittingbourne, Kent, centred on National Grid Reference (NGR) TQ 91863 68335. The village of Iwade is located approximately 1.5km southwest of the Site.

The area surrounding the Site comprises predominantly agricultural / open land to the west, with areas of industrial and commercial use to the south, north and east.

The Swale, a tidal channel of the Thames estuary, is situated 210m to the north of the Site boundary. The Swale is designated as a Ramsar site, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and forms part of Elmley National Nature Reserve. The Site borders the SSSI, SPA and RAMSAR site on its western and southern boundary. These are associated with the Swale.

The Site is accessed on its eastern boundary via Lockyer Road.

The Site is not located within a groundwater Source Protection Zone (SPZ).

The proposed EP Boundary is illustrated in Drawing 01; the Site layout is illustrated on Drawing 02. Local receptors within a 500m radius of the Site are shown on Drawing 03, and Cultural and Natural Heritage Receptors on Drawing 04.



Table 1-1 below summarises the surrounding land uses.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	To the north lies industrial/ commercial premises and The Swale designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
East	To the east lies industrial/ commercial premises and The Swale designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
South	Land to the south of the Site predominantly consists of industrial/ commercial premises including the remainder of the currently unused Morgan Sindall site. Beyond this is the village of Kemsley located approximately 2km south of the Site.
West	The A249 lies approximately 680m to the west. Land around this largely comprises open / agricultural land, in addition to the village of Iwade which is located approximately 1.5km southwest of the Site. The dwellings in Iwade are the closest residential receptors to the Site. Swale railway station is located 9000m northwest of the Site.



2.0 Overview of Proposed Application

2.1 EP Boundary

The proposed EP boundary is shown on Drawing 01 and is replicated in Figure 2-1 below for simplicity.

Figure 2-1 Proposed EP Boundary



2.2 Specified Waste Management Activities

This EP application seeks to allow CRL to store up to 3,500 tonnes of woodchip within the proposed EP boundary.

CRL operate the neighbouring “Ridham Dock Wood Facility” under Permit reference EPR/HB3337AG located immediately to the north of the Site. This site operates as a wood treatment facility to accept, chip and store wood and wood chip for both recovery via biomass CHP and manufacture of panel board, with a maximum annual throughput of 100,000 tonnes.

The EP being sought by this application seeks to support the operations under the neighbouring EPR/HB3337AG permit by storing the woodchip generated from the wood processing activities. The woodchip will be stored on the Site in windrows style stockpiles pending export via boat and road.

As storage is the only activity to be undertaken under the EP, the following R code is the only code to be included in the EP:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection on the site where it is produced).



There is no treatment of waste proposed under the EP.

2.3 Waste Types, Quantities and Storage

2.3.1 Wood Operations

The List of Waste (LoW) codes set out in Table 2-1 below are proposed to be accepted under the EP for the wood operations

Table 2-1 Proposed LoW codes for wood operations

LoW Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste (wood and bark only)
02 01 07	wastes from forestry (wood and bark only)
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
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 03	wooden packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	Waste wood from construction and demolition
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 07	wood other than that mentioned in 19 12 06



LoW Code	Description
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 38	wood other than that mentioned in 20 01 37
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste (wood and bark only)

No more than 3,500 tonnes of wood waste shall be stored on the Site at any one time (four stockpiles of 2,395.73m³ each). Storage timeframes for waste will be a maximum of 6 months.

The Site is not located in a groundwater SPZ. All wood waste is stored on hard standing which is made up of a compacted hard standing and areas of concrete. The surface will be kept fit for purpose such that it can be swept / scraped to prevent a build-up of debris and kept free of signs of cracking and disrepair. The Site has impermeable surfacing, preventing any surface water from running off. All water is captured in one of two on-site tanks, and the collected water is removed by tanker off-site.

It is proposed that the annual throughput of the Site for wood waste will be 30,000 tonnes per annum (tpa).

The Site will operate strictly to 'First in First out' (FIFO) principles.

There will be no treatment of wood waste on the Site under the EP.

2.4 Site Layout

The proposed Site layout is illustrated on Drawing 02. The Site comprises:

- Woodchip storage area - located in the northern half of the Site and with surfacing comprising purpose built impermeable surfacing with sealed drainage to tanks for off-site removal and kerbed edging to prevent any surface water run-off. There will be four windrow style stockpiles of woodchip of 120m x 10m size in the centre of the Site. Each windrow will be 2,395.73m³ with a total of 9,582.92m³ at any one time.

The access point to Site is located on its eastern boundary at NGR TQ 91997 68289, via Lockyer Road.

Two quarantine areas are provided in the southeast and the northwest corner of the Site.

Any process waters generated will be directed by fall to a sump and pumped into one of two 600m³ tanks which will be emptied by tanker and disposed off site as a suitably permitted facility.

Two 450m³ water tanks will be located on the southwest corners of the sites along with fire hoses and associated water pumps.

The positioning and set-up of the woodchip windrows will allow plant access to the sides of all piles and as such the rows can be broken up, turned, moved and monitored effectively. The Site will use thermal sensing strings located every 20m (so 5 strings per windrow) which provides real time temperature monitoring. Therefore, the stockpiles can be viewed as smaller segments.

There will be at least 6m separation distance between each stockpile and the Site boundary.

The woodchip to be stored on the Site will consist of the following:



- C grade = 8-100mm particle size
- A grade = 50-100mm particle size

Conversion factor for woodchip = 0.33 tonnes per m³ (i.e. 1,000 tonnes = 3,000m³)

There is a building located within the proposed EP boundary which at this stage is not intended for any waste related use. It is proposed to retain this area in the EP for future activities which would be carried out under full EP conditions, variations and all EP requirements as required.



3.0 Application Contents

3.1 Application Forms

Parts A, B2, B4, and F1 of the EA's application forms have been completed in support of this EP application.

3.2 Application Fee

In accordance with the EA's charging scheme, the application fee is considered to be as follows:

- 1.16.10 – transfer station taking non-biodegradable wastes £7,930
- Emissions Management Plan: £1,241;
- Fire Prevention Plan: £1,241; and
- Habitats Assessment: £779.

Therefore, the total application fee is calculated as **£11,191**.

3.3 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) has been prepared to assess the environmental risk posed by the proposed operations under the EP.

Strict operational procedures will be implemented at the Site to monitor and manage amenity risks from the activities and include provision for the monitoring of scavenging birds, vermin, insects and litter, mud on road, odour and noise. Potential receptors are illustrated on Drawing 03 and Drawing 04.

Subject to the implementation of the stated management measures, the conclusion has been reached that the operations under the EP are unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (ref. 402.065590.00001_ERA) is enclosed as part of this EP application.

3.4 Operating Techniques

The Site will be operated in accordance with the Operating Techniques (OT) document prepared as part of the EP application. This document sets out best practice for operating the Site, based on legislation and best available techniques in the industry.

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

The OT (ref. 402.065590.00001_OT) is included as part of this EP application.



3.5 Fire Prevention Plan

The Fire Prevention Plan (FPP) has been prepared in accordance with EA's guidance for FPPs¹. The FPP details the required mitigation and management methods to prevent a fire of combustible materials stored on the Site.

The FPP identifies measures to be employed to reduce the likelihood of fires at the Site. In addition, the plan identifies measures to be employed in the event of a fire to limit the damage caused to the environment or human health.

The FPP (ref. 402.065590.00001_FPP) is enclosed with this EP application.

3.6 Site Condition Report

A Site Condition Report (SCR) has been prepared in support of this EP application to establish the baseline environmental conditions within the EP boundary. The SCR has been prepared in accordance with EA guidance H5 (version 3), April 2013².

The facility will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the operations at the Site do not pose a significant risk to the surrounding human and natural environment.

The SCR (ref. 402.065590.00001_SCR) is enclosed as part of this EP application.

3.7 Dust Management Plan

The Dust Management Plan (DMP) has been prepared in accordance with EA's guidance for DMPs. The DMP details the required mitigation and management methods to minimise dust emissions from the Site.

The DMP identifies measures to be employed to reduce the likelihood of dust emissions from the Site. In addition, the plan identifies measures to be employed in the event of a dust emissions to limit the impact of dust emissions on the local environment or human health.

The DMP (ref. 402.065590.00001_DMP) is enclosed with this EP application

3.8 Environmental Management System Summary

It is a requirement as part of Application Form Part B2 for a summary of the Environmental Management System (EMS) to be provided as part of the EP application.

The EMS Summary (ref. 402.065590.00001_EMS) and a copy of CRL's ISO 14001 certificate is enclosed with this EP application.

3.9 Drawings

The following drawings have been prepared in support of the EP application:

- Drawing 01 EP Boundary;
- Drawing 02 Site Layout;
- Drawing 03 Local Receptors; and
- Drawing 04 Cultural and Natural Heritage.

¹ <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits>, accessed February 2026.

² [Environmental permitting: H5 Site condition report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report), accessed February 2026



4.0 Environmental Standards and Control Measures

The key technical standards laid out in this NTS will 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”, last updated November 2023;
- EA Guidance, “Control and monitor emissions from your environmental permit”, last updated November 2022;
- EA Guidance, “Develop a management system: environmental permits”, last updated April 2023;
- EA Guidance, “Non-hazardous and inert waste: appropriate measures for permitted facilities”, last updated August 2023;
- EA Guidance, “Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities”, last updated 12 July 2022 and
- Relevant EA Guidance e.g. Environmental Risk Assessments, Fire Prevention Plans, and Site Condition Reports.

The Site will be managed and operated in accordance with CRL’s EMS. A summary of the EMS is enclosed as part of this EP application.

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

The proposals have been assessed against the above listed standards and are considered to meet the relevant technical standards.

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



