Intended for
Wraik Hill Recycling Limited
Date
June 2026
Project Number
(WH-2026/001)

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Technical Summary

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Project No.	WH-2026/001
Issue No.	1
Date	June 2026
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Version Control Log

Revision	Date	Made by	Checked by	Description
01	12/06/26	RO	SG	Initial creation

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Technical Summary

Wraik Hill Recycling Limited is applying for a bespoke environmental permit for the legal operation of regulated facility at Wraik Hill, Whitstable, Kent, CT5 3BY. The legal operator will be Wraik Hill Recycling Limited.

The site will accept, store and treat domestic, commercial, and industrial waste. The operator intends to carry out a skip hire business which is where most of the waste will derive from. The operator has its own fleet of lorries which is operated under a restricted O-License. Once mixed skip loads are brought back to the facility, the waste will be tipped within a 4 sided building and sorted to extract recyclable materials. Once the waste is sorted into single waste streams (wood, hardcore, metal, plastics, etc), the waste will be immediately loaded into containers which will vary from in size from 4 – 40 yard. Once a container if full, the operator will remove the waste to an appropriately permitted facility for onward recovery or disposal. The operator does not advertise as an 'open tip', and only accepts waste into the site that has been collected by their fleet. The Technically Competent Manager will be Stephen Griffiths. The appropriate CIWM primary and continuing competence certificates have been submitted with the application. The Application Site is centred on OS Grid reference TR 09814 63855

The application seeks a bespoke environmental permit to store (R13) and treat (R4) & (R3) mixed waste generated from mainly from construction and demolition. Treatment includes manual sorting via a 360 grab for the preparation of recycling and downstream recovery operations.

The yard is in an agricultural setting with neighbours south west of the site. The closest receptor lie on Wraik Hill, approximately 45m from the site. The main access to the site is via Wraik. The site maintains the following distances from certain types of sensitive areas and sites:

- not within 500 metres of a European site, Ramsar, Site of Special Scientific Interest or Marine Conservation Zone; and
- not within a groundwater source protection zone 1.
- not within 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Ancient Monument;
- not within 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity;
- not within 250 metres within the presence of Great Crested Newts where it is linked to the breeding ponds of the newts by good habitat;

- not within a groundwater source protection zone 1;
- not within 10 metres of a watercourse; and
- not within a specified Air Quality Management Area designated for particulate matter PM10.

The site does however fall within the proximity to an old disused dairy farm which is within a designated as a 'wildlife site', This receptor has been considered across the application.



The bespoke application has been structured around the standard rules permit SR2022 No 4: non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage, but with reduced treatment techniques and waste types being accepted at the site. The annual tonnage requirement will be 75,000 tonnes. The waste codes to be accepted are:

Waste Code	Description
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
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 01	wood
17 02 02	glass
17 02 03	plastic
17 04 01	copper, bronze, brass
17 04 02	aluminium

17 04 05	iron and steel
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05 04	soil and stones other than those mentioned in 17 05 03
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 12 09	minerals (for example sand, stones)
19 12 12	mixtures of paper, cardboard, plastic glass and metal and other non-hazardous wastes from the processing of dry mixed recyclable and source segregated recyclable wastes.
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20 01 01	paper and cardboard
20 01 02	glass
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in.20 01.37
20 01 39	plastics
20 01 40	metals
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03 07	bulky waste

The waste codes will be limited to non-hazardous only.

Waste Operations

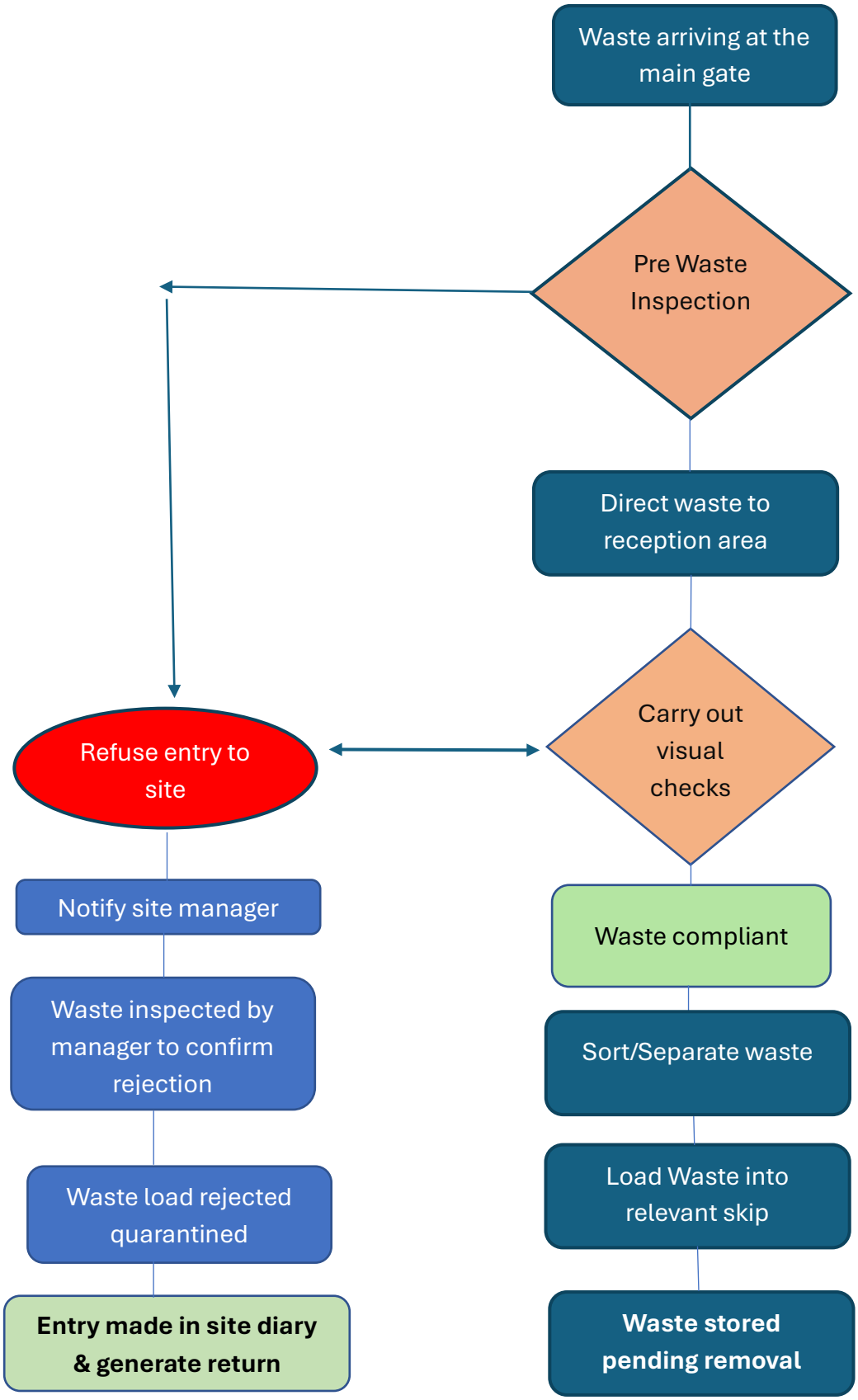
The operation proposes an annual tonnage of 75,000 tonnes under the following activity codes:

Activity reference	Description of specified activity	Limits of specified activity
AR1 – waste transfer and treatment	R3: Recycling/reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic materials. D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.	The activities are limited to the operation of a waste treatment and transfer station. Treatment activities are limited to sorting, separation, bulking. Treatment does not include soil or aggregate washing or heat treatments. The activities are limited as follows: - no more than 75,000 tonnes of waste, shall be accepted per year; - no more than 50 tonnes per day of waste may be treated for disposal.
AR2 – storage of waste	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)n D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)n	No more than 300 tonnes of wastes shall be stored at any one time. Waste shall not be stored for longer than 6 months.

Waste treatment is limited to manual sorting and separation using a 360 material handler.

The Operator intends to carry out waste activities involving the receipt and transfer of mixed waste skips. The waste will be collected from a number of producer sites which will mainly be residential. Once collected and delivered to the application site in appropriate vehicles and by suitably registered waste carriers. The operator has its own fleet of lorries which is operated under a restricted O-License. Once received on the Application Site the waste will be tipped and immediately sorted for onward disposal/recovery off-site at other suitably permitted facilities. The activities will take place under cover and on impermeable surfaces.

Process Flow Chat



The tipping and processing area consists of a 4 sided building. No waste is stored within this building. The Site Layout Plan shows areas where the waste will be stored. All waste is stored within designated skips.

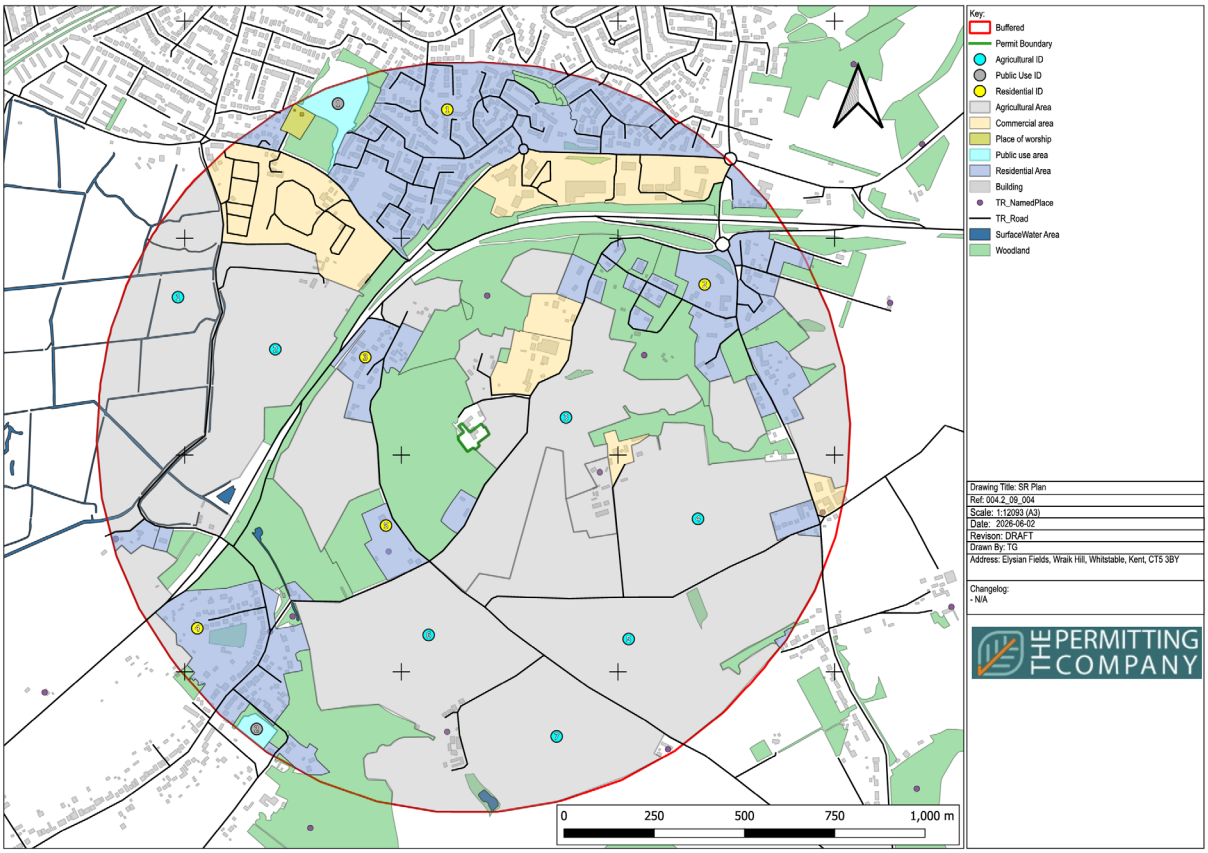
The Operator will ensure stored wastes on site will not reach excessive limits which is achievable through not needing to rely on external hauliers. Waste diversion and contingency planning will ensure Wraik Hill Recycling will not stock excess waste beyond what the permit authorises, or volumetrically as per the table of waste located within the FPP.

How operations are controlled

All receiving and treatment of waste will take place on impermeable surfacing with sealed area and within a 4 sided building. This will reduce fugitive emissions from the activity to a negligible level. Waste will stored in covered skips pending removal once a skip is full.

Opening hours are 7am to 5pm Monday to Friday, and 8am to 1pm on Saturdays

Environmental setting and key receptors >>



Emissions and how we minimise them

Dust/particulates: The waste types and treatment techniques reduce the inherent risk of dust emissions. The EMS sets proportionate controls (e.g., housekeeping, damping/suppression as needed, speed/height limits, quick turnaround of stock. The main control is through the limited treatment techniques being applied for which won't include e.g. shredding, screening, crushing.

Odour, litter, pests, mud: Not expected to be significant. The waste streams will naturally contain light fraction, but considering the waste will tipped and sorted in a 4 sided building, and then transferred to a skip and covered, the risks of these emissions are greatly reduced. This site will maintain routine housekeeping, inspect impermeable surfaces, inspect the 4 sided building, and general site rules will prevent the escape of these emissions and therefore prevent issues. The site will have a fast turn around time which will prevent odour's being generated from old waste. If waste is tipped and is giving rise to odour, it will be immediately sorted and removed from the site.

Noise: Managed through hours of operation, 4 sided building, maintained plant and considerate working; receptors are mainly the identified Local Wildlife Site, surrounding agricultural sites, and local businesses, however, the noise emitted from this activity is negligible as there will be no mechanical treatment on site.

Water: No point-source discharges to controlled waters are permitted. The operation is undertaken within the enclosed 4 sided building. Waste storage will be on within covered skips and therefore protected from adverse weathers. The physical characteristics of the waste types accepted at the site will be solid waste only. There will be no run off from the waste stored on site.

The main features and measures are set out within the EMS and FPP.

Non-hazardous and inert waste: appropriate measures

The waste accepted at the application site will be classified as non-hazardous**.** The waste types do not typically pose a chemical hazard to land or water, The operator recognises the storage, handling and treatment of combustible waste poses fire risks, drainage, pest, and nuisance risks**.** The company has therefore implemented proportionate and effective control measures to prevent pollution, protect human health, and minimise environmental impact and ensure appropriate measures are implemented inline with non-hazardous and inert waste: appropriate measures for permitted facilities document published by the Environment Agency, last updated 1 August 2023.

Site design, layout and storage controls

Wraik Hill Recycling Limited will operate yard with impermeable surfaces within the 4 sided building. This prevents contact between stored waste and underlying soil and prevents effective transmission of pollutants.

Storage areas are:

- Designated for incoming waste, treatment activities and stored waste pending removal
- Arranged to allow safe vehicle movement and pedestrian access
- Managed to ensure stack heights and pile dimensions remain compliant with the FPP table of waste.

Waste is stored in a controlled manner to prevent fire and reduce fugitive emissions. There are firebreaks between stored waste to prevent the spread of fire if a fire was to occur. Stock levels are actively monitored to prevent excessive accumulation and ensure compliance with site permit and limitations set within the table of waste

Fire risk management and prevention

Wraik Hill Recycling Limited recognises fire as the primary environmental risk associated with waste storage. The site operates a comprehensive approach to fire prevention, detection, and response.

Key measures include:

- A strict no-smoking policy across the site
- Control of ignition sources, including vehicles and equipment
- Adequate separation distances between waste and plant (6m)
- Maintenance of clear access routes for emergency services
- Availability of appropriate firefighting equipment
- A Fire Prevention Plan is maintained, setting out:
- Risk assessment findings
- Storage layout and volume limitations
- Emergency response procedures
- Staff responsibilities and training requirements
- Equipment used in a fire such as expanding fire-rated foam

Staff will be trained in fire awareness, alarm procedures, deployment of fire equipment and site evacuation protocols. The plan will be reviewed periodically to ensure it remains effective and up to date.

Drainage, runoff and water protection

Wraik Hill Recycling Limited has implemented measures to prevent contaminated water runoff from leaving the site. The site consists of a 4 sided building which is

naturally bunded via the solid walls. The openings have a fall to prevent water from ingressing into the building. The 360 grab is operated within this building, so spillages from this equipment can not enter ground as the floor is impermeable.

All waste is stored within skips will be covered to prevent ingress of rain water, therefore no run off can occur.

Pest, vermin and nuisance control

The operator understands the poorly managed waste facility can attract pests or cause nuisances. To prevent this, the company maintains high standards of housekeeping and site cleanliness.

Measures include:

- Regular removal of waste from the site
- Monitoring for signs of pests/vermin
- Implementing pest control measures (where required)
- Only accepting waste types listed on their permit

Environmental monitoring, inspections and maintenance

Wraik Hill Recycling Limited will carry out routine inspections of the site to identify and address potential risks before they escalate.

Inspections cover:

- Storage areas, skip condition, coverings, buildings, impermeable surface
- 6m distances between waste storage and sources of ignition or heat.
- Access routes for emergencies
- Fugitive emission control
- Housekeeping standards
- Maintaining plant and equipment in line with manufacturer specifications

Staff training, competence and awareness

All staff involved in waste acceptance, handling, sorting, storage, and all the significant procedural aspects located within the bespoke management system documents such as the EMS and FPP. The site is also complying with an approved competence scheme (CIWM WAMITAB) and has the appropriate level 4 qualification.

Training will refreshed periodically, and staff competence will be monitored to ensure continued compliance with site procedures and legal requirements under the bespoke permit.

Wraik Hill Recycling Limited Obligation

Wraik Hill Recycling Limited will ensure that all relevant appropriate measures and technical standards are implemented and complied with on site.

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