



Environmental Risk Assessment

Allington HWRC

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Drawings

1407 PL104 Site Layout- with Re-Use Shop

[1] Introduction

[1.1] Report Objectives

This report has been prepared in response to Question 4 of the Part C2' form issued by Environment Agency (the Agency). This report is a risk assessment undertaken in accordance the Agency Guidance on 'risk assessments for your environmental permit' (1 December 2025) available as web-based guidance which also provides justification for the use of other more specific risk assessment methodologies if required.

[1.2] Introduction

The Agency guidance requires that everyone applying for a new environmental permit (other than a standard permit) or variation to an existing permit should present information in the form of risk assessment tables, one table each for odour, noise, fugitive emissions (including dust, and bio-aerosols) and pests, birds and vermin. Identification of accidents scenarios and their prevention through operational management should also be detailed.

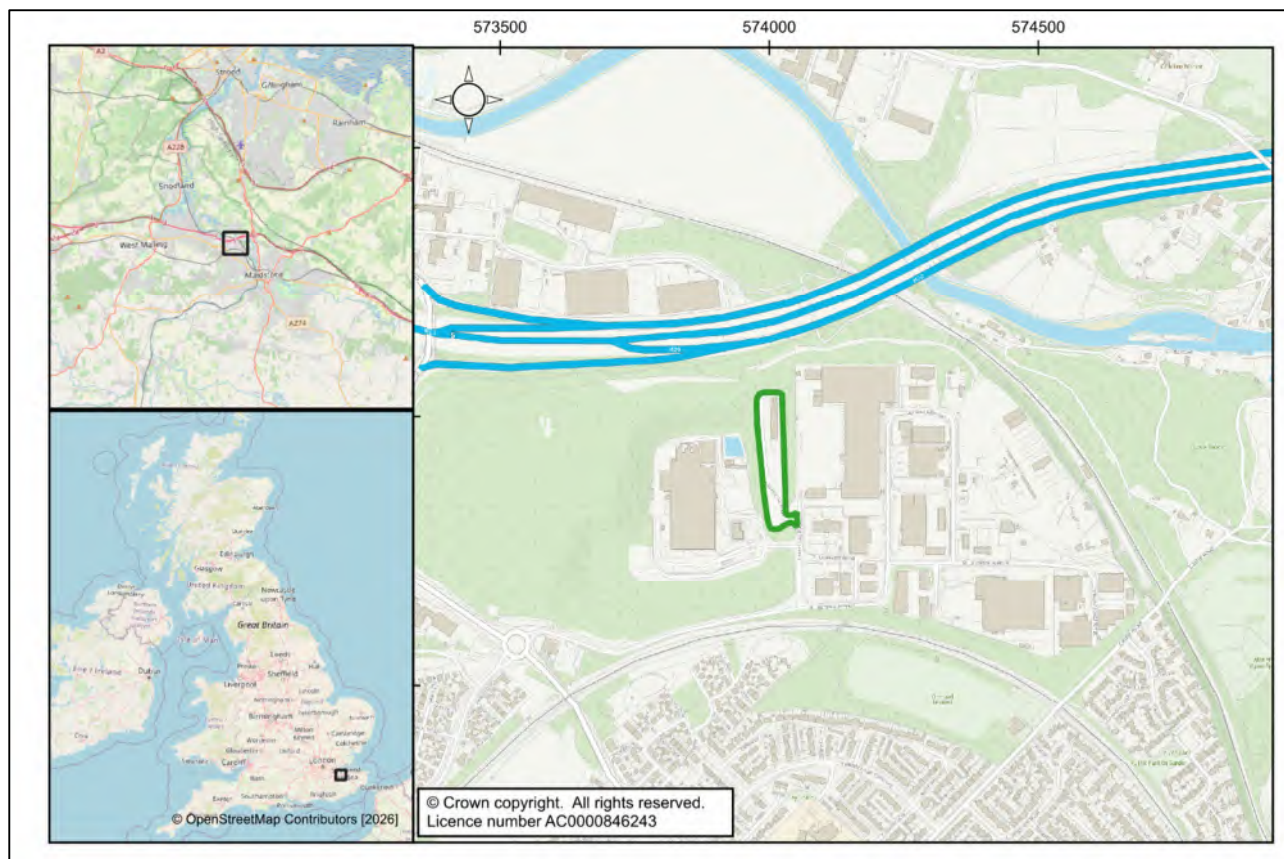
Each table should identify the hazard, the potential receptors and the pathway from the hazard to those receptors. In addition, the tables should also include the preventative risk management practices to be employed along with an assessment of the mitigated risk.

[2] Scope of the Assessment

[2.1] Site Location

Allington Household Waste Recycling Centre (HWRC) (the Site) is located on Laverstoke road, Allington, Maidstone, ME16 0LE. The National Grid Reference for the Site is TQ 74007 57960. A location map for the site is shown in Figure 1.

Figure 1 Site Location



[2.2] Site Operations

The Site operates as a HWRC regulated under environmental permit reference EPR/KB3102KL. The Standard Rules (SR) permit was issued on 4th November 2020 for SR 2015 No.20, 75kte non-hazardous and hazardous household waste amenity site. The permit was transferred from FCC Environment (UK) Limited to FCC Recycling (UK) Limited on 30th March 2021. The permits registered office address was updated on 3rd January 2024. SR 2015 No. 20 was consolidated into SR 2022 No.6 HWRC in December 2024. The site no longer complies with the new location criteria of SR 2022 No.6 due to being in a groundwater source protection zone 1. The Agency have advised that the operator needs to vary the SR permit to a bespoke permit.

The HWRC's key features include a split-level configuration, with the skips and containers positioned at a lower level to allow for easy access for the deposit of waste material. The location of all skips and containers are shown on the Site Layout drawing (Ref: 1407 PL104)

The Site is accessed directly by the entrance off Laverstoke Road to the southeast.

All waste activities will continue to be carried out upon an impermeable concrete/tarmac hardstanding with a sealed drainage system to collect any contaminated run-off.

[2.3] Proposed Operations

The operators proposed to vary the SR permit to a bespoke permit as it no longer complies with the location criteria of the new SR 2022 No.6 rules. Operations will continue in accordance with SR 2022 No. 6 rules.

The restrictions detailed below will still apply to the bespoke permit:

- Treatment is limited to:
 - sorting, separation, shredding, bulking or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery;
 - manual sorting of WEEE;
 - manual removal of plugs, batteries and cables from items of WEEE; and
 - manual sorting of waste batteries.
- No more than 75,000 tonnes of waste shall be accepted per year.
- No more than 10 tonnes of hazardous waste shall be treated per day. Except for manual sorting, the removal of plugs, batteries and cables from items of WEEE and the repair and refurbishment of WEEE.
- There shall be no treatment of asbestos waste including compaction or compression by mechanical or manual means.
- No more than a total of 10 tonnes of whole end of life tyres shall be stored at any one time.
- No more than a total of 10 tonnes of waste batteries shall be stored at any time.
- No more than 50 tonnes of hazardous waste shall be stored at any one time.
- No hazardous waste shall be stored for longer than 6 months.
- No waste shall be stored for longer than 12 months.
- Same waste types as listed in Table 2.3.

The only change is to add the following waste code to the permit:

- EWC code 17 05 04 soil and stones other than those mentioned in 17 05 03

The operator proposes no further changes to the permit.

[3] Potential Hazards

[3.1] Odour

The waste code to be added into the permit does not have the potential for creating odour emissions. The Site accepts wastes that have the potential to create odour emissions however all wastes are stored in containers with limited retention time on Site. No full containers of degradable wastes (household and green waste) shall remain on site for more than four days. Good housekeeping will be carried out with all bays and waste storage areas regularly cleared and cleaned where required so waste and its residues do not accumulate and cause odour problems. There have been no odour complaints at the Site. All events or complaints received associated with odour will be documented and investigated in accordance with the Sites EMS.

The waste code to be added has no potential for creating odour emissions and current odour control measures are sufficient.

The risks associated with odour are summarised in Table 5 for completeness.

[3.2] Pests

The waste code to be added into the permit does not have the potential for attracting pests and scavengers. The Site shall be inspected on a regular basis, and a specialist pest control company is employed to carry out regular site inspections and introduce control measures where necessary. Records of inspections are kept on site.

Waste will be retained only as long as required before being disposed or recovered offsite to minimise any potential source that may attract pests and scavengers. In the event of an infestation on site, action will be taken to control and eradicate the infestation as soon as possible. This may include the use of bait traps and a specialist pest controller. There have been no pest complaints at the Site. All events or complaints received associated with pests will be documented and investigated in accordance with the Sites EMS.

The waste code to be added has no potential for attracting pests and current pest control measures are sufficient. The risks associated with pests and vermin are summarised in Table 6 for completeness.

[3.3] Noise and Vibration

The proposed waste type to be accepted will not pose any additional risk of noise or vibration emissions of those associated with the extant permit for the site. Additionally, no changes are proposed to onsite operations.

Vehicle movements associated with the facility will be in accordance with the operational hours specified in the sites planning permission and council contracts.

All plant and equipment are subject to a maintenance and inspection programme. Plant is on a repair and maintenance agreement with the original equipment supplier, including an annual preventative maintenance service. The plant is monitored remotely by telematics

The plant is inspected daily by the plant operator. The site is inspected weekly by a Technically Competent Person. Both the site and machine are subjected to formal inspections by the Area Supervisor/Contract Manager monthly.

There have been no noise complaints at the Site. All events or complaints received associated with noise will be documented and investigated in accordance with the Sites EMS. It is considered that the current noise and vibration controls are sufficient.

As advised by the Agency in the Basic Pre- Application Advice (EPR/KB3102KL/P001) the Noise Assessment Tool (NAT) has been completed and attached as Appendix H of the permit variation application. The NAT confirmed a noise impact assessment and noise management plan are not required.

The risks associated with noise and vibration are summarised in Table 3 for completeness.

[3.4] Fugitive emissions of dust, particulates and litter

The nature of the activities carried out on the site will not result in the creation of dust. Wastes that have the potential to create fugitive emissions of dust such as soil and rubble and where required un-used or un-set cement are stored in containers at limited volumes, 30 cubic yard container. The majority of containers and skips are stored undercover. The additional waste code is similar to the waste types already accepted and unlikely to increase the potential for fugitive emissions of dust, particulates and litter.

As part of a daily inspection regime the site attendants will ensure that all spillages of soil and other material likely to cause problems will be cleaned from the hardstanding areas and deposited skips.

A road sweeper can be employed and brought onto the site as and when required. The layout of the site will naturally prevent the carriage of mud and debris onto the main highway.

The site will be inspected for accumulated litter within the site (including the site boundary fence) on a daily basis, with ongoing assessments throughout the working day. During periods of particularly adverse weather, more regular inspections may be required.

Skips are compacted during busy periods and weekends to reduce any potential for fugitive emissions of litter. Litter picking and sweeping is also undertaken by Site Operatives to keep the Site clean and tidy. All open top vehicles transferring waste which is likely to escape to and from the site will be covered prior to leaving the site to prevent litter escape. The perimeter security fence will act as an efficient barrier to windblown litter and dust which will be cleared by site operatives as soon as practical and by the end of the working day. The surrounding woodland also acts as a barrier to dust. It is considered that the control measures for fugitive emissions of dust, particulates or litter currently employed at the Site are sufficient.

There has been no dust, particulate or litter complaints at the Site. All events or complaints received associated with fugitive emissions will be documented and investigated in accordance with the Sites EMS.

The risks associated with fugitive emissions of dust, particulates or litter controls are detailed in Table 4.

[3.5] Fugitive emissions to surface water and groundwater

The HWRC is located on concrete / tarmac hardstanding with a sealed drainage system. The site benefits from both surface water sewer and foul sewer connections, with all surface water originating from the waste collection and storage areas, draining to a leachate attenuation tank with a capacity of 148m³, prior to release to sewer via a type 2 full retention separator fitted with a capacity alarm. The drainage to foul sewer layout is illustrated in drawing reference EC-18037.

All hardstanding surfaces will be maintained in a safe condition to provide a hard impervious surface that facilitates easy effective cleaning and adequate storage. The surfaces will be inspected and maintained at regular intervals and any defects or damage will be repaired. The majority of wastes are stored in containers and/or skips.

The drainage system will be designed to ensure there is no surface water runoff entering the system other than from the permitted areas. The system will be maintained and inspected at regular intervals and any blockages will be cleared.

A summary of the Sites procedures in place for the prevention, detection, control, minimisation and remediation of leaks and spillages within the permitted area are shown below:

- Supplies of sand or other non-flammable absorbent material will be kept adjacent to tanks containing flammable liquids for dealing with minor spillages.
- The waste oil tanks/ containers are bunded to 110% of their capacity and situated on an impermeable concrete/tarmac hardstanding with sealed drainage.
- Any Site vehicles and plant will be inspected daily. Any vehicles or plant found leaking fuel or oil will be repaired as soon as reasonably practicable, with an approved contractor notified immediately.
- Oils and fuels will be kept away from waste operations and stored in a secure manner.
- Damaged or leaking chemical and battery containers shall be taken out of use and the contents transferred to a new container.

Current control measures for fugitive emissions to surface water and groundwater are sufficient and as the waste code to be added will be stored in accordance with these measures there will be no increase in risk. The risks associated with fugitive emissions to surface water and groundwater controls are detailed in Table 7 for completeness.

[4] Hazard Pathways

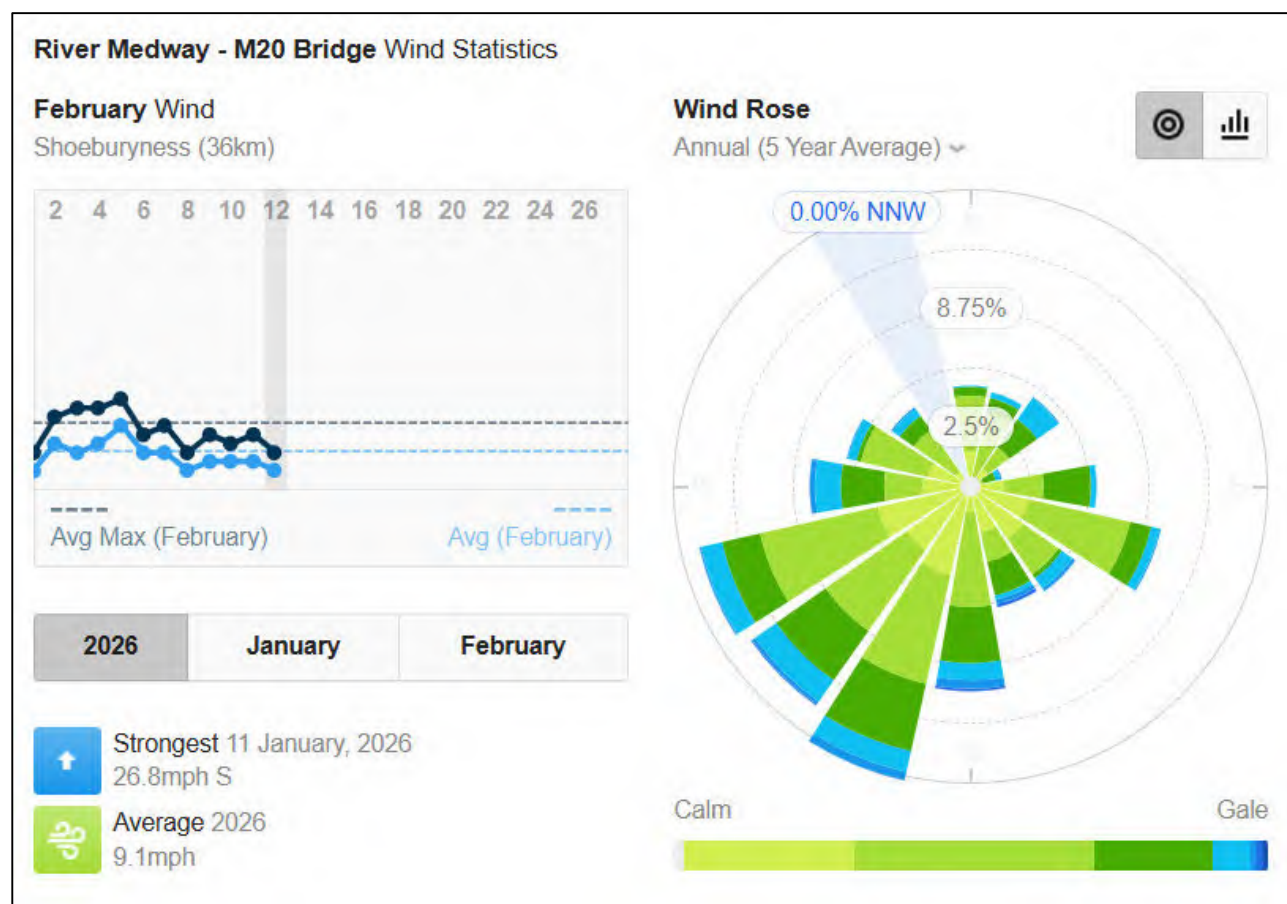
When choosing the receptors, the closest and the most sensitive (if different from the closest) have been considered in each direction from the hazard. Account has been taken of the mechanism of transport to the sensitive receptor e.g., proximity to highway access and wind direction for airborne particulates.

[4.1] Probability of Exposure

Probability of exposure is determined by the distance of the receptor to the site and the likelihood of the hazard reaching the receptor (e.g., frequency of prevailing wind in that direction). This stage of the assessment assumes that exposure has resulted from an uncontrolled emission i.e., without mitigation.

The pathway is determined by the location of the receptor relative to the site, the distance from the site boundary (m) and the frequency (likelihood) the prevailing wind will blow in the direction of the receptor as determined by historical wind rose data¹ for River Medway - M20 Bridge located approximately 0.4 km to the northeast of the Site. The five-yearly average wind rose shows wind predominantly from the south southwest at 13.14 %.

Figure 2- Wind Statistics and Wind Rose from 2021-2026¹



¹ <https://wind.willyweather.co.uk/se/kent/river-medway----m20-bridge.html>

[5] Hazard Receptors

The nearest sensitive receptors to the site are identified in Table 1 below and on the accompanying Sensitive Receptor Location Plan (Figure 3). The distance of these receptors to the site boundary, their direction relative to the site and the frequency the wind blows in the direction of the receptor are detailed in Table 1 below.

Figure 3 Potentially Sensitive Receptors (1 km Radius)

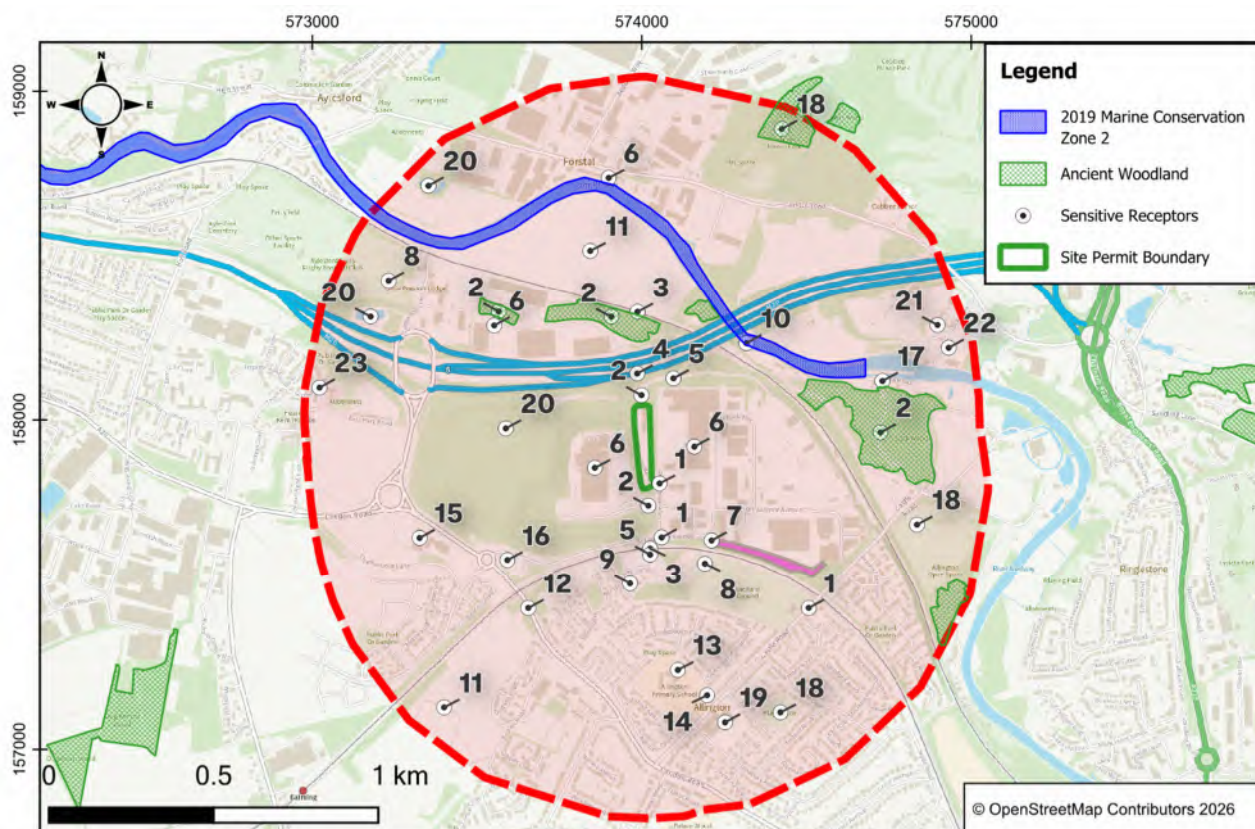


Table 1- Potential Sensitive Receptors

No.	Receptor Description	Receptor Type	Direction from Site	Closest distance to Site boundary	Frequency downwind of Site (%)
1	Access road	Public Highway	E, SE & S	<10	4.22- 7
2	Woodland	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94
3	Railway Line	Transport	N, NE & S	85	4.4 - 11.68
4	M20 Motorway	Public Highway	N	100	8.94
5	Footpath	Footpath	NE & SSE	110	0 - 11.68
6	Industrial Estate	Industrial/Commercial	N, NWN, W & E	130	5.51 - 8.94
7	Allington Quarry SSSI	Geological SSSI	SE	225	4.22
8	Sports Ground	Public/Recreational	WNW & SE	270	4.22 - 8.51
9	Southern Residential Area	Residential	SSE	290	0
10	River Medway	Surface Water/ MCZ2	NE	355	11.68

No.	Receptor Description	Receptor Type	Direction from Site	Closest distance to Site boundary	Frequency downwind of Site (%)
11	Agricultural Land	Agricultural	NNW & SW	500	4.75 - 5.41
12	A20 Dual Carriageway	Public Highway	SW	505	4.75
13	Allington Primary School	Public/Recreational	S	565	4.4
14	Library	Public/Recreational	SSE	660	0
15	Police Traffic HQ	Industrial/Commercial	WSW	685	1.41
16	Restaurant	Commercial	WSW	695	12.1
17	Allington Lock	Transport	E	710	7
18	Open space	Public/Recreational	N, ESE & SE	790	4.22 - 8.84
19	Mid Kent Shopping Centre	Commercial	SSE	750	0
20	Pond	Habitat	NW, NNE, NW & W	725	5.51 - 13.41
21	Kent Owl Academy	Public/ Habitat	ENE	920	12.1
22	Eastern Residential Area	Residential	ENE	930	1.41
23	Royal British Legion Village	Residential	W	960	5.51

Residential, commercial and industrial premises

The Site is located within 20/20 industrial park which contains a number of industrial and commercial units. An industrial estate is located 195 m to the west northwest of the site on Frank Sando Way. The southern region of the Site mostly comprises of residential areas with the closest residential properties being 290 m South southeast on Bunyard way. There appears to be new development areas for residential properties 620 m southwest of the site. Two hotels are within 1km radius of the Site one located to 655 m to the south southwest and one located 930 m to the east northeast. Both hotels are accompanied by public accessed restaurants. The Police Traffic HQ operates 685 m to the west southwest of the Site directly along the M20 motorway.

Habitats

The Agency's Nature and Heritage screening test (pre-application reference EPR/ KB3102KL/P001) that the Allington Quarry SSSI is located greater than 200m from the site boundary. The Medway Estuary (Marine Conservation Zone 2) is located 350 m from the site boundary. There are six areas of Ancient Woodland within the 1km radius of the site, the closest being 191 m from the site boundary. A protected habitat was identified within the deciduous woodland (sensitive receptor 2) up to 50 m from the site boundary. All sensitive receptors identified by the Nature and Heritage screening test are shown in Figure 3., the full screening report is attached in Appendix B.

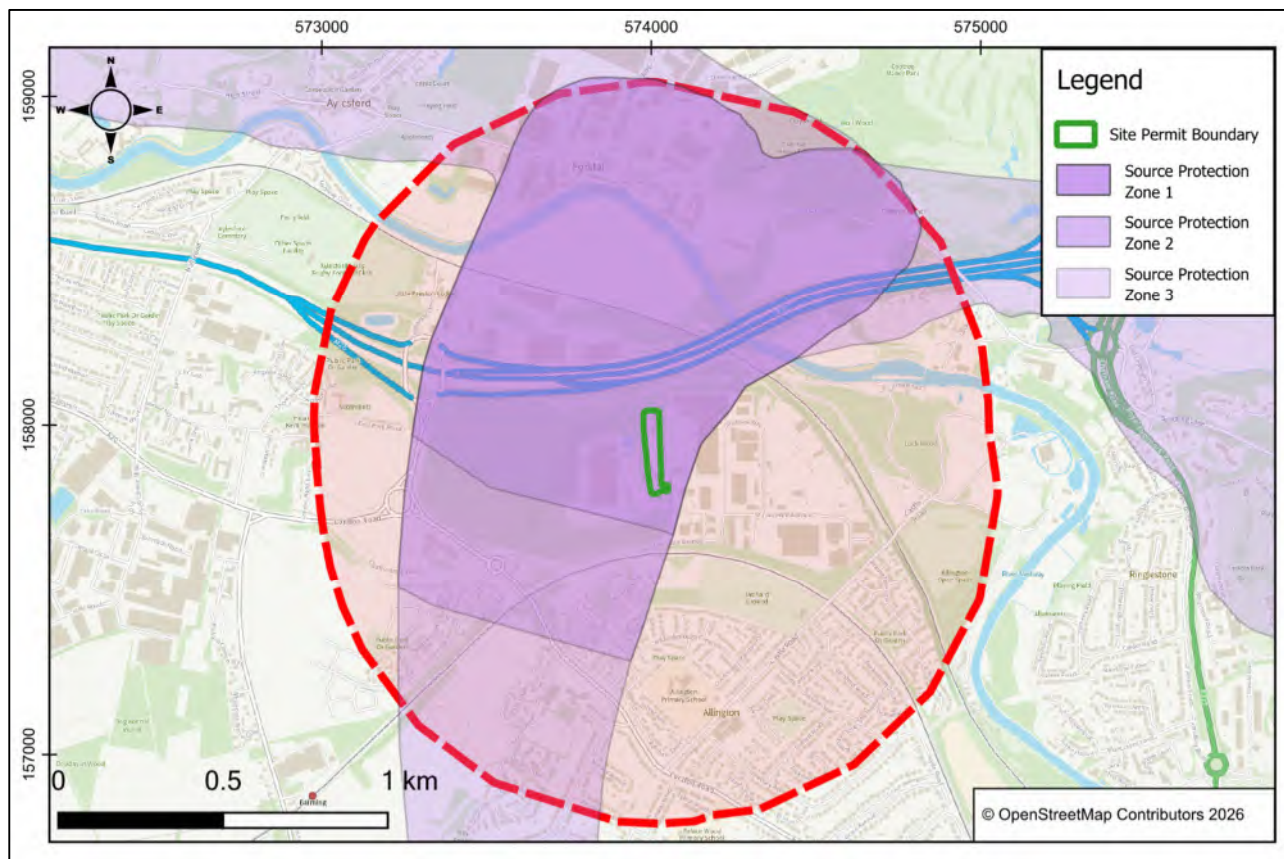
There are no Special Protection Areas, Conservation Areas, National Nature Reserves, National Parks, Areas of Outstanding Natural Beauty or RAMSAR (wetlands) were identified within 1km of the site.

Groundwater Source Protection Zone

The Site is located entirely within Source Protection Zone 1 – Inner catchment, of the Public Water Supply (PWS) boreholes at Forstal, some 650m north of the site, operated by Southern Water. The Source Protection Zones are shown in Figure 4.

The deepest borehole at the Forstal PWS station reaches 129m below ground level (mbgl) and takes water from the permeable strata (Hythe Beds) that extend southwards beneath the River Medway.

Figure 4 Source Protection Zone Map with 1 km Buffer



[6] Risk Assessment

[6.1] Environmental Risk Assessment

The specific risk assessments completed for odour, pests, noise and vibration, and fugitive emissions are detailed in Table 3 to Table 7.

In many cases there is an interrelationship between these specific risk and meteorological conditions, where relevant this has been identified.

The risk assessment tables represent the risk of exposure to a hazard before mitigating controls are put in place. The probability of exposure is therefore not necessarily a reflection of the severity of the impact on the receptor, which may not be sensitive to the hazard. The severity of the unmitigated consequence presumes the receptor has been exposed to the hazard. However, if the receptor is unlikely to be exposed, then the overall unmitigated risk is low and vice versa. The mitigated risk is the residual risk presented by the hazard after control measures have been instigated. This is the most realistic representation of the risk as effective controls will be maintained under the requirements of the environmental permit, planning consent and management procedures set out in the Operator's Environmental Management System (EMS)².

The overall risk posed to the sensitive receptor has been determined using the risk matrix in Table 2.

Table 2 Risk Matrix

Probability	Consequence: Low	Consequence: Medium	Consequence: High
High	Medium	High	High
Medium	Low	Medium	High
Low	Low	Low	Medium

[6.2] Environmental Accidents

The Agency Guidance recommends an assessment of the potential risk of environmental accidents associated with the proposed activity not described in the sections above.

The operations at the site are not considered to require any additional mitigation beyond those already imposed at the operational HWRC and in accordance with the EMS. A Fire Prevention Plan has been updated to account for the additional waste code to be accepted at the Site. This is provided at Appendix E of the Application Report.

Environmental accident risks are assessed with reference to Agency Guidance in Table 8 below.

² FCC Environment- Environmental Management Summary, Allington HWRC March 2026

Table 3 Noise and vibration risk assessment

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Dirac.	Down-wind Freq. %					
Noise & Vibration: (through the air/ground) from site operations and vehicle movements	1	Public Highway	E, SE & S	<10	4.22- 7	High- in close proximity to the Site, occasionally downwind.	Low – existing high traffic noise, transient exposure	Medium	Vehicle movements associated with the facility will be in accordance with the operational hours specified in the sites planning permission and council contracts. All plant and equipment are subject to a maintenance and inspection programme. Plant is on a repair and maintenance agreement with the original equipment supplier, including an annual preventative maintenance service. The plant is monitored remotely by telematics The plant is inspected daily by the plant operator. The site is inspected weekly by a Technically Competent Person. Both the site and machine are subjected to formal inspections by the Area Supervisor/Contract Manager monthly The noise at the Site is considered to be primarily from vehicular movements associated with public access. No noise	Low
	2	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94	High- in close proximity to the Site, infrequently downwind.	High- breeding/nesting disruption	High		
	3	Transport	N, NE & S	85	4.4 - 11.68	High- in close proximity to the Site, frequently downwind.	Low – high ambient noise environment, transient exposure	Medium		
	4	Public Highway	N	100	8.94	High- in close proximity to the Site, occasionally downwind.	Low – existing high traffic noise, transient users	Medium		
	5	Footpath	NE & SSE	110	0 - 11.68	High- in close proximity to the Site, infrequently downwind.	Medium- transient exposure, user experience impacted	High		
	6	Industrial/ Commercial	N, NWN, W & E	130	5.51 - 8.94	High- in close proximity to the Site, occasionally downwind.	Medium- transient exposure, user experience impacted	High		
	7	Geological SSSI	SE	225	4.22	High- in close proximity to the Site, occasionally downwind.	High- noise and vibration sensitive protected site	High		
	8	Public/Recreational	WNW & SE	270	4.22 - 8.51	High- in close proximity to the Site, occasionally downwind.	Medium- noise/ vibration annoyance to employees and visitors	High		
	9	Residential	SSE	290	0	High- in close proximity to the Site, infrequently downwind.	High- noise/ vibration annoyance to residents	High		
	10	Surface Water/ MCZ2	NE	355	11.68	Medium- moderate distance from the Site, occasionally downwind.	Low- minimal direct noise vibration sensitivity	Low		
	11	Agricultural	NNW & SW	500	4.75 - 5.41	Medium- moderate distance from Site, occasionally downwind.	Medium- disruption to potential livestock	Medium		
	12	Public Highway	SW	505	4.75	Medium- moderate distance from the Site, occasionally downwind.	Low – existing high traffic noise, transient exposure	Low		
	13	Public/Recreational	S	565	4.4	Medium- moderate distance from the Site, occasionally downwind.	High- noise/ vibration annoyance to visitors	High		
	14	Public/Recreational	SSE	660	0	Medium- moderate distance from the Site, infrequently downwind.	High- noise/ vibration annoyance to visitors	High		

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
	15	Industrial/ Commercial	WSW	685	1.41	Low- distant from the Site, infrequently downwind	Medium- noise/ vibration annoyance to employees and visitors	Low	measures can be utilised for public vehicles. The Site will attempt to minimise any noise associated with movement and compacting of skips. All events or complaints received associated with noise will be documented and investigated in accordance with the Sites EMS².	
	16	Commercial	WSW	695	12.1	Medium- distant from the Site, frequently downwind	Medium- noise/ vibration annoyance to employees and visitors	Medium		
	17	Transport	E	710	7	Low- distant from the Site, occasionally downwind	Low – existing high traffic noise, transient exposure	Low		
	18	Public/ Recreation al	N, ESE & SE	790	4.22 - 8.84	Low- distant from the Site, occasionally downwind	High- noise/ vibration annoyance to visitors	Medium		
	19	Commercial	SSE	750	0	Low- distant from the Site, infrequently downwind	Medium- noise/ vibration annoyance to employees and visitors	Low		
	20	Surface water/ Habitat	NW, NNE, NW & W	725	5.51 - 13.41	Medium- distant from the Site, frequently downwind	High- breeding/nesting disruption	High		
	21	Public/ Habitat	ENE	920	12.1	Medium- distant from the Site, frequently downwind	High- breeding/nesting disruption	High		
	22	Residential	ENE	930	1.41	Low- distant from the Site, infrequently downwind	High- noise/ vibration annoyance to residents	Medium		
	23	Residential	W	960	5.51	Low- distant from the Site, occasionally downwind	High- noise/ vibration annoyance to residents	Medium		

Table 4 Fugitive Emissions of Dust Risk Assessment

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
Fugitive Emissions of Dust & Litter from wastes as received and site operations.	1	Public Highway	E, SE & S	<10	4.22- 7	High- in close proximity to the Site, occasionally downwind.	Medium- Mud/ dust accumulation, reduced visibility and annoyance to users	High	Wastes that have the potential to create fugitive emissions of dust such as soil are stored in containers at limited volumes.	Low
	2	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94	High- in close proximity to the Site, infrequently downwind.	High- Ecological damage from dust/litter, harm to sensitive species and vegetation	High	All waste is stored within a combination of enclosed and uncovered skips and containers. The skips or containers that are uncovered are located beneath a canopy that covers the entire container area for all 33 m ³ containers.	
	3	Transport	N, NE & S	85	4.4 - 11.68	High- in close proximity to the Site, frequently downwind.	High- Ecological damage from dust/litter, harm to sensitive species and vegetation	High	Any spillages of soil and other material likely to cause potential fugitive emissions will be cleaned from the hardstanding areas and deposited skips.	
	4	Public Highway	N	100	8.94	High- in close proximity to the Site, occasionally downwind.	Low- transient exposure	Medium	A road sweeper can be employed and brought onto the site as and when required.	
	5	Footpath	NE & SSE	110	0 - 11.68	High- in close proximity to the Site, infrequently downwind.	Medium- user exposure to dust/ litter, transient exposure	High	The site will be inspected for accumulated litter and/or dust throughout the working day.	
	6	Industrial/ Commercial	N, NWN, W & E	130	5.51 - 8.94	High- in close proximity to the Site, occasionally downwind.	Medium- employee exposure to dust/litter, impacts on operations/ site management	High	Skips are compacted during busy periods and weekends to reduce any potential for fugitive emissions of litter.	
	7	Geological SSSI	SE	225	4.22	High- in close proximity to the Site, occasionally downwind.	High- Ecological damage from dust/litter, harm to sensitive species and vegetation	High	Litter picking and sweeping is also undertaken by Site Operatives to keep the Site clean and tidy.	
	8	Public/Recreational	WNW & SE	270	4.22 - 8.51	High- in close proximity to the Site, occasionally downwind.	High- dust and litter annoyance to employees/ users	High	All open top vehicles transferring waste which is likely to escape to and from the site will be covered prior to	
	9	Residential	SSE	290	0	High- in close proximity to the Site, infrequently downwind.	High- dust and litter annoyance to residence, impacts on public health	High		
	10	Surface Water/ MCZ2	NE	355	11.68	Medium- moderate distance from the Site, occasionally downwind.	High- impacts on water quality and ecology	High		
	11	Agricultural	NNW & SW	500	4.75 - 5.41	Medium- moderate distance from the Site, occasionally downwind.	High- crop contamination, impacts on livestock	High		
	12	Public Highway	SW	505	4.75	Medium- moderate distance from the Site, occasionally downwind.	Medium- Mud/ dust accumulation, reduced visibility and annoyance to users	Medium		
	13	Public/ Recreation al	S	565	4.4	Medium- moderate distance from the Site, occasionally downwind.	High- dust and litter annoyance to employees/ users	High		
	14	Public/ Recreation al	SSE	660	0	Medium- moderate distance from the Site, infrequently downwind.	High- dust and litter annoyance to employees/ users	High		
	15	Industrial/ Commercial	WSW	685	1.41	Low- distant from the Site, infrequently downwind	Medium- employee exposure to dust/litter, impacts on operations/ site management	Low		

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk	
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %						
	16	Commercial	WSW	695	12.1	Medium- distant from the Site, frequently downwind	Medium- employee exposure to dust/litter, impacts on operations/ site management	Medium	leaving the site to prevent litter escape.		
	17	Transport	E	710	7	Low- distant from the Site, occasionally downwind	Low- no direct links to roads	Low	Any containers with materials found to be causing an unacceptable level of dust at the site will be sheeted and removed from site.		
	18	Public/ Recreation al	N, ESE & SE	790	4.22 - 8.84	Low- distant from the Site, occasionally downwind	High- dust and litter annoyance to employees/ users	Medium	The perimeter security fence will act as an efficient barrier to windblown litter which will be cleared by site operatives as soon as practical and by the end of the working day.		
	19	Commercial	SSE	750	0	Low- distant from the Site, infrequently downwind	Medium- employee exposure to dust/litter, impacts on operations/ site management	Low			
	20	Surface water/ Habitat	NW, NNE, NW & W	725	5.51 - 13.41	Medium- distant from the Site, frequently downwind	High- impacts on water quality and ecology	High			All events or complaints received associated with dust & litter will be documented and investigated in accordance with the Sites EMS ² .
	21	Public/ Habitat	ENE	920	12.1	Medium- distant from the Site, frequently downwind	High- Ecological damage from dust/litter, harm to sensitive species and vegetation	High			
	22	Residential	ENE	930	1.41	Low- distant from the Site, infrequently downwind	High- dust and litter annoyance to residence, impacts on public health	Medium			
	23	Residential	W	960	5.51	Low- distant from the Site, occasionally downwind	High- dust and litter annoyance to residence, impacts on public health	Medium			

Table 5 Odour Risk Assessment

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc	Down-wind Freq. %					
Odour through the air: from wastes as received and site operations.	1	Public Highway	E, SE & S	<10	4.22- 7	High- in close proximity to the Site, occasionally downwind.	Low- transient exposure	Medium	The waste acceptance protocols aim to identify non-permitted waste and malodorous waste which will be rejected and redirected to the customer, or to an appropriate permitted facility All waste operations are carried out undercover or stored in containers and are on concrete/tarmac hard standing with sealed drainage systems. Routine cleansing of the Site is undertaken as required. In addition, staff will be instructed to ensure that all external areas of the Site are clear of any litter or other wastes. Regular olfactory monitoring will be conducted. Drainage infrastructure is inspected, maintained and repaired as necessary. All events or complaints received associated with odour will be documented in accordance with the Sites EMS.	Low
	2	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94	High- in close proximity to the Site, infrequently downwind.	Low – not a nuisance to habitats	Medium		
	3	Transport	N, NE & S	85	4.4 - 11.68	High- in close proximity to the Site, frequently downwind.	Low- transient exposure	Medium		
	4	Public Highway	N	100	8.94	High- in close proximity to the Site, occasionally downwind.	Low- transient exposure	Medium		
	5	Footpath	NE & SSE	110	0 - 11.68	High- in close proximity to the Site, infrequently downwind.	Medium- odour annoyance to users, transient exposure	High		
	6	Industrial/ Commercial	N, NWN, W & E	130	5.51 - 8.94	High- in close proximity to the Site, occasionally downwind.	High- odour annoyance to employees/ users	High		
	7	Geological SSSI	SE	225	4.22	High- in close proximity to the Site, occasionally downwind.	Low – not a nuisance to habitats	Medium		
	8	Public/Recreational	WNW & SE	270	4.22 - 8.51	High- in close proximity to the Site, occasionally downwind.	High- odour annoyance to users	High		
	9	Residential	SSE	290	0	High- in close proximity to the Site, infrequently downwind.	High- odour annoyance to residence	High		
	10	Surface Water/ MCZ2	NE	355	11.68	Medium- moderate distance from the Site, occasionally downwind.	Low- not a nuisance to watercourses	Low		
	11	Agricultural	NNW & SW	500	4.75 - 5.41	Medium- moderate distance from the Site, occasionally downwind.	Low – not a nuisance to crops and livestock	Low		
	12	Public Highway	SW	505	4.75	Medium- moderate distance from the Site, occasionally downwind.	Low- transient exposure	Low		
	13	Public/ Recreational	S	565	4.4	Medium- moderate distance from the Site, occasionally downwind.	High- odour annoyance to users	High		
	14	Public/ Recreational	SSE	660	0	Medium- moderate distance from the Site, infrequently downwind.	High- odour annoyance to users	High		
	15	Industrial/ Commercial	WSW	685	1.41	Low- distant from the Site, infrequently downwind	High- odour annoyance to employees/ users	Medium		
	16	Commercial	WSW	695	12.1	Medium- distant from the Site, frequently downwind	High- odour annoyance to employees/ users	High		

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc	Down-wind Freq. %					
	17	Transport	E	710	7	Low- distant from the Site, occasionally downwind	Low- transient exposure	Low		
	18	Public/ Recreational	N, ESE & SE	790	4.22 - 8.84	Low- distant from the Site, occasionally downwind	High- odour annoyance to users	Medium		
	19	Commercial	SSE	750	0	Low- distant from the Site, infrequently downwind	High- odour annoyance to employees/ users	Medium		
	20	Surface water/ Habitat	NW, NNE, NW & W	725	5.51 - 13.41	Medium- distant from the Site, frequently downwind	Low – not a nuisance to habitats	Low		
	21	Public/ Habitat	ENE	920	12.1	Medium- distant from the Site, frequently downwind	High- odour annoyance to users	High		
	22	Residential	ENE	930	1.41	Low- distant from the Site, infrequently downwind	High- odour annoyance to residence	Medium		
	23	Residential	W	960	5.51	Low- distant from the Site, occasionally downwind	High- odour annoyance to residence	Medium		

Table 6 Pests and Vermin Risk Assessment

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
Pests and Vermin: over land / through the air	1	Public Highway	E, SE & S	<10	4.22- 7	High- in close proximity to the Site	Low– not sensitive to pests & vermin	High	All waste operations are carried out undercover or stored in containers and on concrete/tarmac hard standing with sealed drainage systems. Routine cleansing of the Site is undertaken as required. In addition, staff will be instructed to ensure that all external areas of the Site are clear of any litter or other wastes. If evidence of vermin or insect infestation is found during regular inspections, an approved contractor will be used to eradicate the problem. All events or complaints received associated with pests will be documented in accordance with the Sites EMS.	Low
	2	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94	High- in close proximity to the Site	Medium– disturbance to local wildlife	High		
	3	Transport	N, NE & S	85	4.4 - 11.68	High- in close proximity to the Site	Low– not sensitive to pests & vermin	High		
	4	Public Highway	N	100	8.94	High- in close proximity to the Site	Low– not sensitive to pests & vermin	High		
	5	Footpath	NE & SSE	110	0 - 11.68	High- in close proximity to the Site	Low– not sensitive to pests & vermin	High		
	6	Industrial/ Commercial	N, NWN, W & E	130	5.51 - 8.94	High- in close proximity to the Site	High - nuisance / potential health impact	High		
	7	Geological SSSI	SE	225	4.22	High- in close proximity to the Site	Low– not sensitive to pests & vermin	High		
	8	Public/Recreational	WNW & SE	270	4.22 - 8.51	High- in close proximity to the Site	High - nuisance / potential health impact	High		
	9	Residential	SSE	290	0	High- in close proximity to the Site	High - nuisance / potential health impact	High		
	10	Surface Water/ MCZ2	NE	355	11.68	Medium- moderate distance from the Site	Low– not sensitive to pests & vermin	Low		
	11	Agricultural	NNW & SW	500	4.75 - 5.41	Medium- moderate distance from the Site	Medium– disturbance to crops and livestock	Medium		
	12	Public Highway	SW	505	4.75	Medium- moderate distance from the Site	Low– not sensitive to pests & vermin	Medium		
	13	Public/Recreational	S	565	4.4	Medium- moderate distance from the Site	High - nuisance / potential health impact	High		
	14	Public/Recreational	SSE	660	0	Medium- moderate distance from the Site	High - nuisance / potential health impact	High		
	15	Industrial/ Commercial	WSW	685	1.41	Low- distant from the Site	High - nuisance / potential health impact	Medium		
	16	Commercial	WSW	695	12.1	Low- distant from the Site	High - nuisance / potential health impact	Medium		
	17	Transport	E	710	7	Low- distant from the Site	Low– not sensitive to pests & vermin	Low		

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
	18	Public/Recreational	N, ESE & SE	790	4.22 - 8.84	Low- distant from the Site	High - nuisance / potential health impact	Medium		
	19	Commercial	SSE	750	0	Low- distant from the Site	High - nuisance / potential health impact	Medium		
	20	Surface water/Habitat	NW, NNE, NW & W	725	5.51-13.41	Low- distant from the Site	Medium– disturbance to local wildlife	Low		
	21	Public/Habitat	ENE	920	12.1	Low- distant from the Site	High - nuisance / potential health impact	Medium		
	22	Residential	ENE	930	1.41	Low- distant from the Site,	High - nuisance / potential health impact	Medium		
	23	Residential	W	960	5.51	Low- distant from the Site,	High - nuisance / potential health impact	Medium		

Table 7 Fugitive emissions to surface water and groundwater

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
Fugitive Emissions to Surface water and Groundwater: from wastes as received and site operations.	1	Public Highway	E, SE & S	<10	4.22- 7	Low – no hydraulic link	Low- receptor not sensitive to emission	Low	All waste operations will be carried out on a hard standing with a sealed drainage system to prevent spillages or seepages to groundwater or surface water. All waste is stored within a combination of covered and uncovered skips and containers. The skips or containers that are uncovered are located beneath a canopy that covers the entire container area for all 33 m³ containers. If a spill or leak of potentially polluting material occurs immediate steps will be taken to contain it. This will include following the emergency management plan, the use of absorbent granules or sand as appropriate and closure of the penstock valve. Surface run-off on the site will flow towards the drainage gullies along the western boundary of the site. Clay drain sealing mats are situated in the welfare unit spill kit in the even there is high amounts of fugitive emissions on the sites	Low
	2	Priority Habitat/ Protected Species	N, E & S	30	4.4 - 8.94	Low – no hydraulic link	High – potential contamination event	Medium		
	3	Transport	N, NE & S	85	4.4 - 11.68	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	4	Public Highway	N	100	8.94	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	5	Footpath	NE & SSE	110	0 - 11.68	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	6	Industrial/ Commercial	N, NWN, W & E	130	5.51 - 8.94	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	7	Geological SSSI	SE	225	4.22	Low – no hydraulic link	High – potential contamination event	Medium		
	8	Public/Recreational	WNW & SE	270	4.22 - 8.51	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	9	Residential	SSE	290	0	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	10	Surface Water/ MCZ2	NE	355	11.68	Low – no hydraulic link	High – potential contamination event	Medium		
	11	Agricultural	NNW & SW	500	4.75 - 5.41	Low – no hydraulic link	High – potential contamination event	Medium		
	12	Public Highway	SW	505	4.75	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	13	Public/Recreational	S	565	4.4	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	14	Public/Recreational	SSE	660	0	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	15	Industrial/ Commercial	WSW	685	1.41	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		

Hazard /Pathway	Receptor					Probability of exposure	Consequence	Overall Risk	Risk Management	Residual Risk
	No	Type of land use	Dist. (m)	Direc.	Down-wind Freq. %					
	16	Commercial	WSW	695	12.1	Low – no hydraulic link	Low- receptor not sensitive to emission	Low	surface. These will be used to seal in the drain gullies temporarily if required.	
	17	Transport	E	710	7	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	18	Public/Recreational	N, ESE & SE	790	4.22 - 8.84	Low – no hydraulic link	Low- receptor not sensitive to emission	Low	The site has a 148 cu/mt attenuation tank. Contaminated waters from where waste is stored is discharged to foul sewer.	
	19	Commercial	SSE	750	0	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	20	Surface water/Habitat	NW, NNE, NW & W	725	5.51 - 13.41	Low – no hydraulic link	High – potential contamination event	Medium	Drainage will be checked on a six-monthly basis or if there has been a notable incident on site which has led to increased surface water accumulating. Identified defects will be noted in accordance with the Sites EMS and rectified as soon as practically possible and, in any event, within seven working days unless otherwise agreed with the Agency.	
	21	Public/Habitat	ENE	920	12.1	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	22	Residential	ENE	930	1.41	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		
	23	Residential	W	960	5.51	Low – no hydraulic link	Low- receptor not sensitive to emission	Low		

Table 8 Accident Risk Assessment

Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Risk Management	Residual Risk
Fuel / engine oil leak Waste oil storage	Surface Water	Site drainage / Runoff	Low	Medium - pollution of surface water	Medium	Vehicles / plant on site will be road worthy and well maintained. Impermeable surfaces and contained drainage system will prevent uncontrolled surface water run-off from site. A spill kit will be available on the lower level near to the Plant parking, Spill kits will also be placed around the site near to potential spill areas, e.g. waste and cooking oil collection points, bag spilling area, chemical and paint storage. Oils are stored on Site in accordance with the Oil Storage Regulations (The Control of Pollution (Oil Storage) (England) Regulations 2001). Engine oil will be store in a bunded tank on an impermeable tarmac hardstanding with sealed drainage Cooking oil will be stored in bunded oil containers on an impermeable tarmac hardstanding with sealed drainage	Low
Fire Uncontrolled burning of wastes or site facilities / arson	Surface Water	Site drainage	Low	Medium - pollution of surface water through firewater run-off or leaks from damaged equipment	Medium	Site to be operated in accordance with the Fire Prevention Plan ³ Impermeable surfaces and contained drainage system will retain any firewater. No deliberate burning of waste or other fires to be undertaken at site. All staff are trained to vigilant for non-compatible waste types and flammable wastes. All the skips and containers on site will be clearly labelled for ease of identification. Site users will be directed to individual skips depending on the material being deposited and the availability of space in each skip. The HWRC is fitted with security fencing and a high-security palisade gate which is kept locked during non-operational hours. A CCTV system will be in operation at the Site 24 hours a day and remotely monitored. The CCTV system will cover the entire site and is used for security purposes and as a fire detection system. The Site area will be secured out of hours to mitigate against arson or vandalism.	
	Receptors listed in Table 1- Potential Sensitive Receptors above Site personnel/ Visitors	Airborne	Low	High - smoke / noise annoyance High – Site personnel/visitors injury			
Explosion	Site personnel/ Visitors	Airborne	Low	High - danger of serious injury	Medium	No smoking on site All staff are trained to be vigilant and identify any incompatible non-conforming waste such as any drums, containers, with labels, i.e.,	

Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Risk Management	Residual Risk
Combustion of Explosive wastes / Explosive atmosphere	Surface Water	Site drainage	Low	Medium - pollution of water through leaks from damaged equipment		flammable. These waste streams will be stored in appropriate containers which provide segregated sections to prevent reactions between incompatible or unstable wastes. The guidance states that to reduce the risk of self-combustion, management of the waste volumes, storage times and temperatures of the waste are required. Waste is stored at limited volumes as dictated by the container capacities. The time the waste is kept on site will also be short due to the fact that once the skips or containers are filled, they will be emptied. All waste is stored within a combination of enclosed and uncovered skips and containers. The skips or containers that are uncovered are located beneath a canopy that covers the entire container area for all 33 m³ containers, to reduce heating from direct sunlight. A 6 m exclusion zone will be maintained between plant or equipment and combustible waste when the machinery is not in use. The wastes will not be stored near to or subject to vehicles or plant which may represent an ignition hazard Gas bottles/cylinders are stored upright in a locked gas cage away from other wastes and plant. The gas cage is situated on gas cage on an impermeable tarmac hardstanding with sealed drainage surface	
Vandalism Damage to site vehicles, plant, or buildings	Groundwater / surface water	Site drainage	Low	Medium - pollution of groundwater and/or surface water through leaks from damaged equipment	Low	The HWRC is fitted with 1.5 m high-security grade palisade fencing with galvanised finish around the perimeter. The site entrance is also fitted with a high-security grade palisade gate which is kept locked during non-operational hours. A CCTV system will be in operation at the Site 24 hours a day and remotely monitored. The CCTV system will cover the entire site and is used for security purposes. The Site area will be secured out of hours to mitigate against arson or vandalism.	

[7] Conclusions

The risk assessments detailed in Table 3 to Table 8 within Section [6] of this document indicate that the addition of the EWC code is highly unlikely to cause an increase of emissions from the Site.

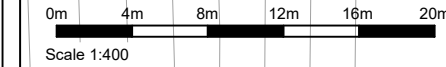
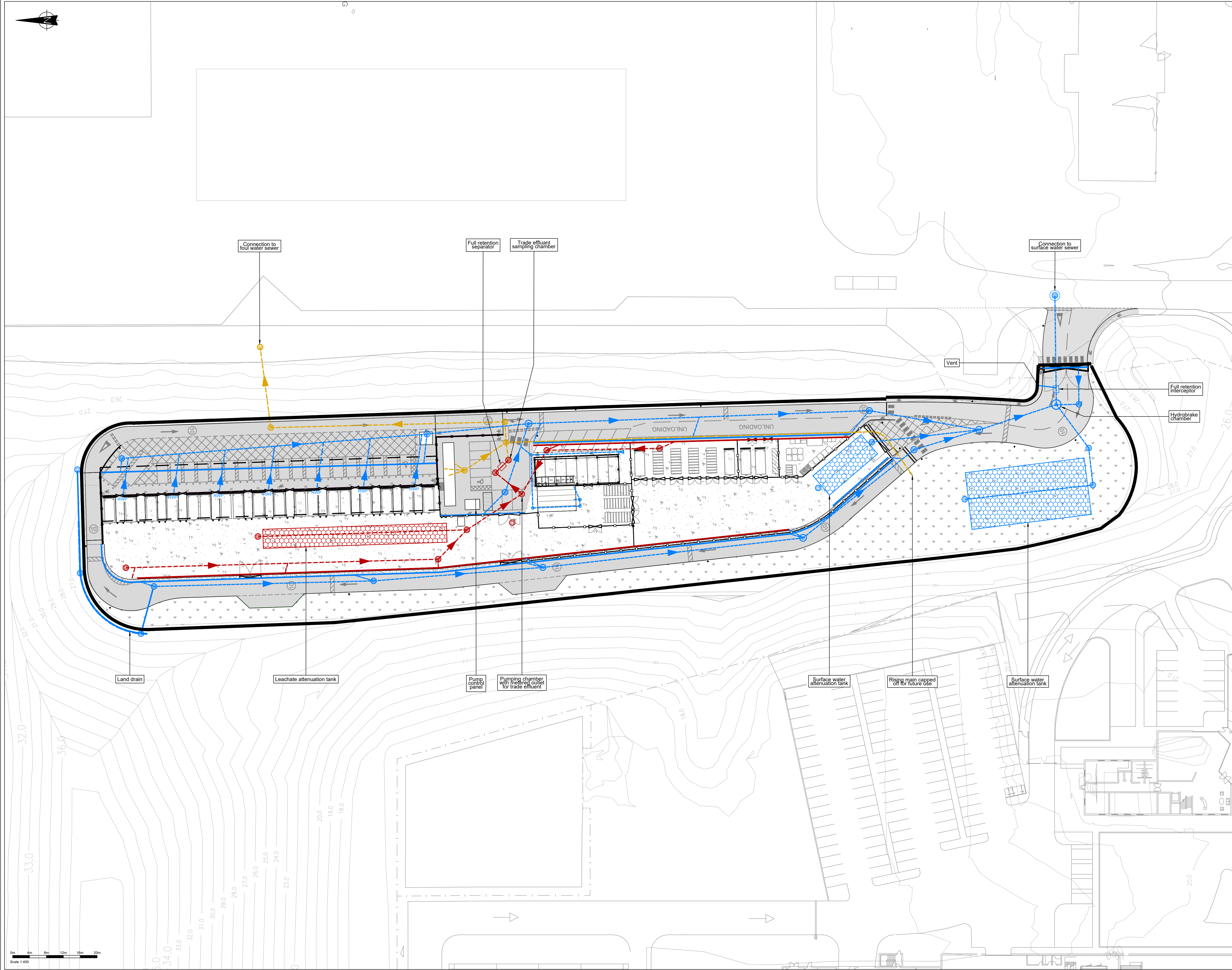
Accidents such as fires, explosions or leakages may pose a threat to the local environment. However safe site working practices, effective control measures and strict waste acceptance criteria as detailed within section [6] of this report make such accidents highly unlikely. The Site has a Fire Prevention Plan³ that has been updated to account for the additional waste code. A copy is provided at Appendix E of the Application Report.

The site design provides an impermeable surface with sealed drainage to mitigate the contamination of surface water and groundwater.

It has been concluded that with the use of appropriate mitigating controls where necessary, the changes to the site will not present a risk to surrounding receptors.

³ FCC Allington HWRC Fire Prevention Plan- March 2026 (Ref: IMS-FRM-046 Rev 7.0)

Drawings



- Notes:
1. All dimensions in metres and all levels in metres above ordnance datum unless specified otherwise.
 2. Do not scale from this drawing.
 3. Any anomalies identified with the details shown on this drawing are to be brought to the attention of FCC environment (UK) limited prior to construction works commencing.

Legend:

	Concrete Hardstanding
	Tarmac Hardstanding
	Grass/Vegetation
	Site Boundary
	Internal Palisade Fence
	Mesh Fence
	Gate
	Foul Pipe
	Foul Rising Main
	Foul Manhole
	Surface Water Pipe
	Surface Water Rising Main
	Surface Water Manhole
	Surface Water Rodding Eye
	Surface Water ACO drainage channel
	Surface Water Attenuation Tank
	Leachate Pipe
	Leachate Rising Main
	Leachate Manhole
	Leachate ACO drainage channel
	Leachate Attenuation Tank

Revision	Date	Description	By	CA
001	24.02.2026	First Issue	MT	AO

FCC Environment (UK) Limited
Ground Floor West, 500 Pavilion Drive, Northampton Business Park, Northampton, NN4 7BG

Site: Allington HWRC				
Drawing Title: Drainage Plan				
Drawn By: MT	Checked By: AO	Date: 24 Feb 2026	Scale: 1:200	Paper Size: A1
Status: Level 1	Project No: EC-18037	Revision: S01	Plan Number: 811	