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Premier Tyres
Atlantic Works
Environmental Risk Assessment

THE PERMITTING COMPANY

Premier Tyres Limited
Environmental Risk Assessment

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Contents

1. Introduction

The Permitting Company Limited (TPC) was commissioned by Alan Skinner (Sole Trader Trading as Premier Tyres) (Alan Skinner, the 'Operator' or the 'Client') to prepare an Environmental Risk Assessment (ERA) for its waste facility located at Atlantic Works, Oakley Road, Southampton, SO16 4LL (the 'Facility', or the 'Site'). The ERA has been prepared in support of the Client's application for an Environmental Permit.

The operator currently operates under a T8 exemption for the mechanical treatment of end-of-life tyres. The site is applying for a bespoke permit application of which has been built in line with the criteria of SR2015 No13, the reasoning that the operator cannot apply for the Standard Rules is due to its proximity of a BAP (Biodiversity Action Plan) protected woodland area.

The objective of the ERA is to identify the scenarios where pollution to air, water or land could occur, particularly where there is the likelihood of an accident. The Environmental Risk Assessment (ERA) has been carried out based on the Environment Agency's (EA) EPR H1 Guidance.

In accordance with the aforementioned guidance, the ERA is structured as follows:

1. Identification and consideration of risks for the facility and sources of the risks.
2. Identification of receptors (people, animals, property and anything else that could be affected by the hazard) at risk from the Facility.
3. Identification of possible pathways from the source of the risks to receptors.
4. Assessment of the risks relevant to the specific activities carried out at the site and consideration of which risks can be screened out as negligible.
5. Description of measures to control identified risks.

2. Identification of Environmental Risks

Source-Pathway-Receptor Concept

In order for pollution to have an impact on the environment, a pollution linkage must be present which relies on the Source-Pathway-Receptor concept, where all three factors must be present and linked for a potential risk to exist.

A 'pollution linkage' requires the following:

- A 'source' is a substance which is in, on or under the land and which has the potential to cause significant harm to a relevant receptor, or to cause significant pollution to controlled waters.
- A 'receptor' is something that could be adversely affected by a contaminant, for example a person, an organism, an ecosystem, property, or controlled water.
- A 'pathway' is a route by which a receptor is or might be affected by a contamination.

Identification of the source, pathway and receptor enables management interventions to be made to manage the environmental risks and avoid pollution reaching the receptor.

In this section the potential sources (environmental risks) of pollution at the Facility are identified and screened for their significance, and the potential pathways and receptors are identified.

Environmental Risk

The operator is required to identify the environmental risks (source of potential contamination) which could occur during the operation of the Facility, including any risks which may arise from accidents. The EA online guidance stipulates that the Operator must consider the following potential risks:

- Any discharge (e.g. sewage or trade effluent to surface water or groundwater)
- Accidents
- Odour
- Noise and vibration
- Uncontrolled and unintended ('fugitive') emissions (for which risks include dust, litter, pests and pollutants that shouldn't be in discharge)
- Visible emissions

In considering the risks, the Operator can determine that a potential risk is not considered to be significant in terms of its potential impact on the environment, however a justification must be provided for any risk which is 'screened out'.

Based on the guidance summarised above, the potential environmental risks at the Facility have been identified and have been determined either significant or not significant based on the potential environmental impact arising from the risk. A summary of the risks is presented in the table below which also provides justification where risks are considered to be insignificant. The risks which have been identified as significant have been included in the risk assessment in Section marked 'Risk Assessment Methodology' of this report.

Table 1: Screening of Environmental Risk

Environmental Risk	**Applicability**	**Justification**
Controlled discharges to surface water	Not Applicable	There are no controlled discharges to surface water from the Facility. This risk has not been considered for further assessment.
Controlled discharges to groundwater	Not Applicable	There are no controlled discharges to groundwater from the facility. This risk has not been considered for further assessment.
SPZ1	Applicable	
Accidents	Applicable	Plant and equipment failure: the failure of plant or equipment may result in an incident occurring which could potentially impact on the environment. Fire and potential for firewater runoff. Material handling: Wastes to be processed will be stored in a dedicated storage bay or container. Wastes will be transported across the Facility via HGV's and Plant. Raw Materials are stored within drums and other containers in dedicated storage areas within the building. There is the potential for accidents (e.g. spills, leaks etc.) which may result in contaminated run-off. Vandalism: The facility is in a mixed commercial and industrial setting. The risk of vandalism cannot be discounted. Operator Error: All processing plant is manually operated, and the potential for operator error cannot be ruled out.
Odour	Applicable	The operations will be covered in the EMS to put systems in place to not allow odours wastes onto site. The risk will be low due to the nature of the waste type.

Noise and Vibration	Applicable	Operations at the Facility have the potential to produce noise if not appropriately managed. In particularly the movements of Heavy Goods Vehicles making deliveries to and collections from site.
Visual Impact	Not Applicable	All operations will be operated within a four-sided building and all wastes to be stored within the building.
Emission to air and water	Applicable	Fugitive emissions of dust and odour may be generated during the movement of materials around the site. The building is sealed and is not connected to a drain. Storm water discharges: storm water run-off from the sites roofs and yard area is directed into a dedicated surface water outlet. This is done outside of the permitted area.
Controlled releases to air	Not Applicable	The facility does not have any controlled air emissions systems in place in line with their operations, as the operation does not give rise to airborne emissions.
Global Warming Potential	Applicable	Indirect emissions arise from the use of electricity, and water. There are no direct emissions produced by the facility.
Facility Waste	Applicable	Wastes will be produced at the Facility as a result of the production processes, maintenance and administrative functions.

3. Parameters

Parameter 1

These permitted activities:

- R3 – recycling and reclaiming organic substances which are not used as solvents.
- R4 – recycling and reclaiming metals and metal compounds.
- 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).

Parameter 2

The permitted waste types:

- are restricted to those listed in Tables 2.3a and 2.3b of the permit (EWC 16 01 03 – End-of-life tyres).

Parameter 3

Quantity of waste accepted at the facility is restricted to:

- less than 21,000 tonnes each year
- No more than 100 tonnes of end-of-life tyres can be stored at any one time.
- Treatment and storage of end-of-life tyres will be carried out in a building. Treatment must be for the purpose of recovery of the waste, and is limited to manual sorting, baling.

Parameter 4

All waste listed in Table 2.3a of the SR shall be stored and treated on an impermeable surface with sealed drainage system which meets a design standard.

Waste listed in Table 2.3b of the SR may be stored and treated on either hardstanding or on an impermeable surface with sealed drainage system.

Parameter 5

The only point source discharges to controlled waters are clean surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes. No other direct or indirect discharges are permitted.

Parameter 6 to 7

The activities shall not be carried out within:

- 200 metres of a European site (within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2017) or a Site of Special Scientific Interest, including candidate or proposed sites or Maritime Conservation Zone
- 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Monument – site lies within 50m of a BAP therefore the bespoke application is required
- 50 metres of a site that has species or habitats of principle importance (as listed in Section 41 of the Natural Environment and Rural Communities Act 2006) that the Environment Agency considers at risk to this activity, these are also often referred to as priority habitats and species – the site is within 50 meters of a BAP, this is why a the bespoke permit route is needed.
- 50 metres of any well, spring or borehole used for the supply of water for human consumption, including private water supplies
- a groundwater source protection zone 1

4. Identification of Receptors

A receptor is defined as something that could be adversely affected by a pollutant. Based on desk-based research, information provided by the Client and the information relating to the environmental setting (provided in the SCR), TPC has identified the receptors within the vicinity of the site. A summary of the identified receptors is provided in the table below.

Table 2: Summary of Identified Receptors

Receptor	Location
Groundwater: Desk study indicates the site is underlain by permeable superficial deposits (River Terrace Deposits comprising sand and gravel) and the wider area includes a productive superficial aquifer. The underlying bedrock is classified as a Secondary A aquifer (intergranular flow). Groundwater vulnerability is reported as medium**;** therefore groundwater is considered a relevant controlled waters receptor and potential pathways (e.g., via defects in surfacing/drainage, service trenches or unsealed areas) must be appropriately controlled. No Source Protection Zones are identified within 500 m and no licensed groundwater abstractions are recorded within 1 km.	On site and in the immediate vicinity.
Surface Water: The nearest named surface water receptor is Tanners Brook, located approximately 48 m north-west of the site. Given the proximity of this receptor, uncontrolled releases or contaminated surface water runoff could potentially migrate via overland flow or drainage connections, particularly during heavy rainfall or flood conditions.	Within 1km of site
Ground: The permit area is predominantly sealed by hardstanding. Site photographs indicate the operational footprint comprises a concrete slab internally and concrete hardstanding externally, with no exposed ground observed in the main working areas. Localised staining is visible in places consistent with historic/operational use, however no widespread contamination or evidence of active leaks is apparent from the visual inspection evidence provided. Minor cracking and edge deterioration are visible locally within the yard and should be maintained to prevent the development of preferential infiltration pathways. **Bedrock:** The underlying bedrock geology is recorded as the Wittering Formation**,** described as sandstone and siltstone**.** The bedrock is associated with intergranular flow and forms part of a Secondary A aquifer designation locally, meaning groundwater remains a relevant receptor for protection under the permit.	On site and in the immediate vicinity.

Atmosphere: No site-specific air quality constraints (e.g., AQMA designation or background pollutant concentrations) have been confirmed within the desk-study dataset reviewed for this SCR/ERA. The site is located within an established industrial area; therefore, the principal relevant atmospheric considerations for the proposed activity are expected to relate to operational emissions such as dust, vehicle exhausts and smoke/particulates in the event of fire.	On site and in the immediate vicinity.
Designated Ecological Sites: Desk-study screening identifies a BAP Priority Habitat woodland adjacent to (or immediately near) the site, which is considered a local ecological receptor that could be affected by polluted runoff or spill mobilisation if pathways exist. In addition, the wider area contains statutory ecological designations within 2 km, including records of SSSI**,** Ramsar**,** SAC and SPA designations. While these are not necessarily directly connected to the site, they reinforce the need to prevent releases to controlled waters and to maintain effective surface water and spill controls. Adjacent to site (BAP woodland) and within 2 km of site (statutory designations).	Within 2km of site
Human Occupation: The site is located in a predominantly industrial/commercial setting within Southampton, with surrounding land uses comprising industrial and commercial premises and associated transport activity. Potential human receptors include site operatives and visitors on site, neighbouring workers at adjacent commercial/industrial premises, and members of the public using surrounding access routes.	Within 1km of the site

5. Potential Pollution Pathways

Identification of Possible Pathways from the Sources of the Risks to Receptors

The potential pollution pathways between the source identified (excluding those which have been screened out) and the receptors identified are summarised in the table below.

Table 3: Potential Pollution Pathways

Source	Potential Pathway	Receptor
Odour: arising from the waste materials.	Through the air.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Noise and Vibration: arising from vehicle movements, site operations and process machinery.	Transmitted through the air and through ground vibration.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Accidents: including plant or equipment failure, materials handling, vandalism, operator error, fire and flooding.	Over site surface, through site drainage systems and through the air.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Fugitive Emissions: including dust, odour, litter and surface water run-off.	Through the air, windblown over Facility surfaces, through Facility drainage systems.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes /

		roadways surrounding the Facility.
Controlled release to air: from point source	Through the air, windblown.	Atmosphere, and humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the site.
Global Warming Potential: from fossil fuels.	Through the air.	Atmosphere.
Facility Waste: wastes arising as a result of production process, maintenance and administrative functions undertaken at the facility.	Windblown over ground, surface water run-off.	Groundwater; surface water; ground; and atmosphere.

6. Risk Assessment Methodology

The risk assessment provides a simple representation of the hypothesised relationships between contaminants, pathways and receptors. This allows the identification of potential contamination linkages and, therefore an interpretation of the potential for pollution to occur at the Facility or within the vicinity of the site as a result of the activities at the Facility.

The potential for pollution to occur at the site is determined by assessing the likelihood of an identified receptor being exposed to pollution emanating from a source at the Facility and the resultant consequences of any such exposure. In determining the likelihood and the consequence of a pollution exposure the risk management techniques which are used at the Facility, and the effect on any such exposure are considered. Where the risk management techniques are considered to have a mitigating impact, the resultant overall likelihood of the pollution exposure occurring and its consequences on a receptor are lowered.

Assessing likelihood and consequences

Within the risk assessment, each hypothesised relationship between contaminants, pathways and receptors is assessed to determine the likelihood of the receptor being exposed to pollution and the consequences of exposure using the rankings listed in the tables below.

Table 4: Likelihood Ranking

Very Low	Low	Medium	High
Exposure to pollution is considered to be highly unlikely	Exposure is considered to be unlikely	Exposure is considered to be likely	Exposure is considered to highly likely to occur

Table 5: Consequence Ranking

Very Low	Low	Medium	High
No impact or imperceptible impact on the receptor.	Low level impact easily and quickly mitigated or may not require any intervention to rectify any impact.	Moderate impact which will not be rectified without some mitigation/ intervention.	High impact requiring significant intervention/mitigation and may have caused irreparable damage to the receptor.

Assessment of Risk

Following the determination of the likelihood and consequence ranking for the hypothesised relationship development using the source-pathway-receptor concept, the matrix in the table below is used to determine the overall risk of the pollution exposure occurring.

Table 6: Risk Matrix

		Likelihood			
		Very Low	**Low**	**Medium**	**High**
Consequence	**High**	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

7. Risk Assessment

Odour

The potential sources of odour at the Facility have been identified and used to develop the risk assessment.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Odour: receiving waste materials	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Fugitive emissions to air	The EMS includes strict waste pre-acceptance and acceptance procedures.	Low	Low	Low

Noise

The potential sources of noise at the facility have been identified and used to develop the risk for noise.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Noise: arising from the movement of heavy goods vehicles (HGV) and engine noise/alarms from other vehicles working on and visiting the site.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air and the ground vibration	A site speed limit of 10 miles per hour will be in operation across the Facility to minimise engine noise. Deliveries are timed so that vehicles will not 'back up' waiting to get onto the site. A no idling policy will be enforced on-site and vehicle users will be required to switch off their engines when not in use. The site has been designed so that vehicles delivering and removing waste will either not have to reverse, or the reversing will be kept to an absolute minimum by minimising the amount of maneuvering needed Routine inspection and maintenance of roads.	Low	Low	Low

Noise and Vibration: arising from the internal handling of raw materials and equipment.			All waste will be handled with care when being loaded or unloaded. Drop heights will be minimised to reduce the impact of waste hitting site or vehicle surfaces and care will be taken to ensure any manual handling. Deliveries are only received during normal working (daylight) hours as detailed within the planning permission. The working hours are between 07:00 and 18:00 Monday to Friday and 09:00 and 13:00 Saturday. Routine inspection and maintenance of equipment.	Low	Low	Low

Accidents

The risk assessment for accidents at the site

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Accidents: Leaks and spillages	Ground	Over surface and through drainage systems	Regular maintenance will be undertaken on all plant and equipment in accordance with the manufacturer's guidance. Daily plant checks will be undertaken to identify and respond to any defects/leaks. Spill kits will be provided, and staff will be fully trained on their use. In the event of a spill or leak that could cause risk to the environment, the Site Manager will be informed. If necessary, works shall cease while measures are put in place to remediate the leak or spill and the Environment Agency will be informed. Emergency response procedures will be in place at the site including leaks and spillage.	Very Low	Medium	Low
	Groundwater			Very Low	Medium	Low
	Surface Water			Very Low	Medium	Low

Accident: Plant failure and breakdown	Ground	Through facility drainage system	All plant will be checked on a daily basis, and any issues reported immediately. All internal areas of the Facility feature impermeable surfaces. Spill kits will be available in key risk areas. A spill response procedure will be defined in the site's Accident Management Plan featured within the EMS. The site will keep critical spares for important plant or parts so that minimal disruption will be experienced in the event of plant failure or breakdown. Contracts are in place for plant and equipment with local main agents in the event of a breakdown, replacement, or repairs. In the event of prolonged plant failure that could lead to environmental impact, site operations may temporarily cease, and any incoming vehicles will be diverted to an alternative (off-site) permitted facility for treatment. All vehicles and plant will be turned off when not in use.	Very Low	Low	Low
	Groundwater			Very Low	High	Medium
	Surface Water			Very Low	Low	Low
Accidents (Vandalism): Damage/theft of externally located equipment/tanks	Ground	Over Facility surfaces, and through drainage systems,	CCTV will cover the site, which will be secured by fencing and with authorised access only. Site will be kept locked at all times when the site is not operational.	Very Low	Low	Low

	Groundwater		The Facility will be manned between the hours of 07:00 to 18:00 from Monday to Friday and between the hours of 09:00 and 13:00 on a Saturday. CCTV will be monitored by an external company appointed by the estate. Internal cameras will be monitored by Premier Tyres Staff. when the site is not manned, automatic alerts will be sent through to the TCM and business owner. There is limited potential for contamination to reach surface water from accidents and vandalism.	Very Low	Low	Low
	Surface Water			Very Low	Low	Low
Accidents (Fire): Fire and arson attacks	Grounds	Over Facility surface, through the air and through the drainage system.	Strict waste pre-acceptance and acceptance procedures will be put in place to minimise the risk of non-compliant wastes being accepted. The operator will undertake regular maintenance of plant and equipment in accordance with the manufacturer's guidance. Firefighting equipment will be available on site for handling small fires. Infrastructure will be designed in line with the FPP requirements. All chemicals will be stored in accordance with manufacturers guidance within a dedicated chemicals storage area inside the building. FPP will be reviewed regularly to make sure the procedures are reflective of the risk and activity at the site.	Medium	Medium	Medium
	Groundwater			Medium	High	Medium
	Surface Water			Medium	Medium	Medium

	Atmosphere			Medium	Medium	Medium

Fugitive Emissions

The risk assessment for fugitive emissions is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Fugitive Emissions: dust, mud and odour	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All incoming and outgoing vehicles will be sheeted or covered to prevent any load loss. Management plans are in place and monitoring will be undertaken. Waste pre-acceptance and acceptance procedures ensure that potential dusty loads are rejected. Drop heights will be minimised were possible.	Low	Medium	Low
	Atmosphere			Low	Medium	Low
Fugitive Emissions: contaminated surface water run-off from external areas.	Surface Water	Through drainage system	The permitted area is sealed and within the building.	Low	Medium	Low
	Ground Water			Low	Medium	Low

Controlled Releases to Air

The risk assessment for controlled releases to air is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Controlled Release to Air: (number) extraction points from the (locations)	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	Currently no controlled release to air.	Very Low	Very Low	Very Low
	Atmosphere			Very Low	Very Low	Very Low

Global Warming Potential

The risk assessment for Global Warming Potential is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Global Warming Potential: use of grid-sourced electricity to support production processes resulting in in-direct emissions of greenhouse gasses.	Atmosphere	Through the air	Energy consumption will be monitored Site will act in accordance with the Climate Change Adaptation Assessment	High	Very Low	Low

Facility Waste

The risk assessment for Facility Waste is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Facility Waste: Wastes which arise from production and administration activities at the site comprising: mixed recyclables, general waste, wood, cardboard and hazardous waste.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All wastes produced at the Facility will be segregated and provided with suitable containment. All wastes will be stored within a dedicated recycling and waste area.	Low	Low	Low
	Surface Water	Over Facility surface and through drainage systems				

	Groundwater					
	Ground					

8. Environmental Risk Assessment Conclusion

TPC has identified the potential environmental risk at the Facility and determined the potential environmental impact arising from each risk. The assessment has demonstrated that with the appropriate management controls in place, risks identified are acceptable.