



Sutton Courtenay Parish Council

The Board of Directors
FCC Environment (UK) Limited
Company number 02902416
3 Sidings Court
White Rose Way
Doncaster
DN4 5NU

Friday 23rd October 2026

For the attention of: Steven John Longdon, and Fraser Wilson McKenzie.

**Formal representation: Sutton Courtenay landfill and composting – regulatory findings,
corporate oversight and required actions**

Dear Directors,

I write on behalf of Sutton Courtenay Parish Council (SCPC) about the environmental performance and governance of FCC operations at Appleford Sidings, Sutton Courtenay OX14 4PW. We request direct Board-level attention to recent, documented Environment Agency (EA) findings concerning the composting facility and landfill. This is against a longer history of community concerns about odour, fires and leachate management (please see Table 1 at Appendix 1).

This letter is addressed to FCC Environment (UK) Limited because we seek assurance about oversight across its relevant operating companies, namely:

- FCC Recycling (UK) Limited (composting; EA Environmental Permit number EPR/BP3295ET, Legacy Reference MP3232WS).
- Waste Recycling Group (Central) Limited (landfill; historical Main Landfill Permit EPR/BV7001IK and Phase 3 Expansion Permit EPR/TP3330AT).

We recognise that the individual permit holders retain their own legal responsibilities.

1. Why SCPC is escalating now?

SCPC recognises the importance of responsible waste treatment. Our concern is the evidence of significant off-site odour impacts and repeated shortcomings in operational controls, and the need for a transparent, independently verifiable remedy. Following a series of fire and off-site odour incidents in 2026, and against the background of years of incidents (Table 1 in Appendix 1) and the concomitant deleterious impact on the wellbeing of our community, SCPC resolved at its October meeting that it would write to you to request urgent Board-level attention and scrutiny of incidents.

2. Environment Agency Regulatory Compliance Assessment Findings

This year, as the permitting authority and regulator, the Environment Agency (EA) has been busy at the Sutton Courtenay site due to a number of incidents as you will see in Table 1, Appendix 1. We have highlighted **just** a few of the **major** findings as documented in the EA's Compliance Assessment Reports (CARs) which it produces to summarise findings and actions following a visit to the site facility. We have only referenced documents that are publicly available at <https://environment.data.gov.uk/public-register/view/index>. In any case, the managers responsible for each of the operations will have copies as the reports would have been issued to them.

Windrow Composting operations (all dates in 2026) – sample of breaches

3 August 2026: The EA issued a compliance assessment (report ref: MP3232WS/0604484) recording two Category 2 (CCS2) non-compliances at the composting facility:

- odour under condition 3.2.1
- management-system controls under condition 1.1.1.

An Environment Agency **CCS2** breach (Compliance Classification Scheme Category 2) is a non-compliance with an environmental permit that has the **potential to cause significant environmental harm, significant impact on people, or property/infrastructure damage**, carrying a penalty score of 31 points.

The EA also identified inadequately separated windrows, concerns about oxygen ingress and anaerobic conditions, and debris and septic liquid in drainage channels.

7 August follow-up EA recorded (MP3232WS/0604804) the earlier non-compliances as ongoing, without scoring new breaches.

2 September A further EA assessment issued (MP3232WS/0606429) recorded a Category 3 (CCS3) non-compliance under

- condition 1.1.1 after identifying 678.48 tonnes of potentially odorous Buckinghamshire green waste accepted after midday on nine Fridays in June and July, contrary to the site Odour Management Plan. The cumulative score was 66 points which placed it in Bands D to F signifying poor performance and triggering heavy regulatory scrutiny. EA stated that as a result the 2027 subsistence fees would be 150% of baseline – the banding is linked to financial penalty.

EA also recorded an ongoing CICS2¹ significant pollution incident, as it considered there to be an ongoing risk of serious pollution, and stated that enforcement options including partial or full permit suspension were under consideration. We do not assume that suspension subsequently occurred.

¹ A CICS2 incident is a Category 2 (significant environmental effect) pollution or non-compliance event classified under the Environment Agency's Common Incident Classification Scheme (CICS)

Landfill Operations – sample of breaches

January and February 2026 - Separately, landfill CARs identify groundwater-related permit non-compliances in (including BV7001IK/0589710, /0589863 and /0593188), and

7 August 2026 - a CCS3 breach for failure to undertake required monitoring at obstructed boreholes GW14 and GW28 (TP3330AT/0604893, issued 7 August 2026). These findings do not themselves prove off-site groundwater contamination, but warrant scrutiny of monitoring reliability and management response.

Additionally, SCPC remains very concerned about the reported July/August/September 2026 composting fire; landfill fires and earlier incidents, including the reported 2024 leachate episode. We request verified accounts of their causes and outcomes rather than assert conclusions which are not yet established in the documents currently accessible to us. Some photographs of the 2026 fires are included in Appendix 2.

3. FCC Environment (UK) Limited's Published governance commitments

FCC Environment (UK) Limited's 2025 Section 172 statement, signed on behalf of the Board on 28 September 2026, describes the Board's responsibility for stakeholder relationships and monthly management meetings between divisional senior management and UK executive directors. It identifies environmental considerations and site health and safety as paramount. We recognise Section 172 duties are owed to the company; our question is how does the published governance arrangements operate in practice in response to the many serious findings by the Environment Agency.

4. Request to FCC Environment (UK) Limited for substantive responses to SCPC's six clarification requests

- i. **Board oversight:** identify when the July–September EA findings, the CICS2 incident, potential suspension, landfill monitoring failures and reported fire were escalated; who reviewed them; and the decisions and resources committed and what measures have been implemented to ensure a repeat of these incidents will not take place.
- ii. **Corrective action:** provide the completed root-cause investigations, actions and outcomes required by the EA (including August and September deadlines), the present status of each non-compliance, and evidence that the measures are effective.
- iii. **Odour and waste controls:** explain the repeated failure to follow the Odour Management Plan, measures to prevent recurrence, controls for windrow aeration and incoming waste, and objective performance measures for off-site odour.
- iv. **Monitoring and independent assurance:** explain compost monitoring-system reliability, missing/backup records, landfill borehole access and groundwater monitoring, and commission or facilitate an appropriately independent technical review with a shareable summary.

- v. **Fire prevention, future operation and restoration:** provide a verified account of the September fire, investigations, preventative changes and restart assessments; outline the anticipated programme for each facility, including closure, aftercare and restoration where applicable.
- vi. **Accountability and engagement:** nominate a Board-level sponsor, provide a dated action plan with responsible owners, meet SCPC and neighbouring representatives promptly, and agree regular public-facing progress updates.

5. Timetable and next steps

Please acknowledge this letter within five working days of receipt, identify a senior contact, and provide a point-by-point substantive response within 14 calendar days. If technical work remains outstanding, state what has been completed, what remains, the responsible owner and a firm completion date. Please propose dates for an urgent senior-level meeting.

SCPC is separately seeking regulatory records and the current enforcement position from the EA under the Environmental Information Regulations 2004. That request complements, rather than replaces, the Board's responsibility to explain its own actions. We reserve the right to make further representations to the relevant authorities and wider FCC group if an adequate response is not forthcoming.

Yours faithfully,

Miss J. Currie

Clerk and RFO, Sutton Courtenay Parish Council

Evidence references (EA public register)

Composting: MP3232WS/0604484 (3 Aug 2026); /0604804 (7 Aug 2026); /0605674 and /0606429 (2 Sep 2026). Landfill: BV7001IK/0589710 (12 Jan 2026); /0589863 (19 Jan 2026); /0593188 (23 Feb 2026); TP3330AT/0604893 (7 Aug 2026). Public register: <https://environment.data.gov.uk/public-register/>

Other Encl: Appendix 1: Table of recent and historical incidents circa 2020 to present

Appendix 2 photos of fires at the FCC site – compost and landfill 2026 summer

Appendix 1

Date	Incident
Early 2000s	Deep-seated landfill fire – A major fire occurred approximately two decades ago, requiring weeks of excavation to extinguish. This indicates unmanaged hotspots and inadequate fire-prevention controls in older landfill cells.
2010s	Local records indicate persistent community complaints relating to odour, dust, mud on roads, and litter escape
2018	Landfill fire reported
2019	Landfill fire requiring Oxfordshire Fire and Rescue Services in attendance
2022	Major Landfill fire (FCC) A major fire occurred at the landfill, referenced in later reporting as part of the site's fire history March - April 1, 2022, Fire: A massive fire broke out at the main landfill site adjacent to Appleford Sidings. Multiple fire crews from the Oxfordshire Fire and Rescue Service were deployed to combat the flames, which burned intensely through a large volume of processed landfill waste overnight before being brought under control and fully extinguished the next morning. This specific incident broke a multi-year period of fire-free operations at the site and was later cited by local officials as part of a worrying pattern when the facility suffered multiple subsequent fires
2023	Late 2023 Odour Complaints: Following a period of relative compliance, the Environment Agency recorded a marked rise in local odour complaints starting at the end of October 2023. Officers conducted assessments and confirmed strong landfill gas odours blowing downwind, which served as an early indicator of the larger gas management issues that later peaked during the 2024 crisis
2024	June 2024 Odour Crisis:

Date	Incident
	The Environment Agency declared a Level 2 "significant odour incident" after receiving an unprecedented wave of over 120 to 130 formal complaints from local residents The Cause: Investigations during a site visit on 7 June 2024 revealed that a massive, highly pungent pool of leachate (liquid waste) had built up on top of the landfill
2025	Significant Odour Incident: A formal ERA identified key risks: odour, dust, noise, vermin, contaminated water, VOCs, and environmental accidents. Following more than 130 local complaints, the Environment Agency formally classified the facility's emissions as a level 2 "significant odour incident" Leachate Pool Discovered: Investigations revealed that a massive, highly pungent pool of leachate (liquid formed when water mixes with organic waste) had accumulated on the site, causing a persistent stench to blanketing surrounding communities
June/July 2026	EA confirmed compost type odours detectable off site, with a large increase in complaints
2026	Major Fire incidents A major fire involving large volumes of processed waste required eight fire crews and multi-agency response 1st and 22nd April 2026 Oxfordshire Fire and Rescue Service called to deal with a fire to Sutton Courtenay Landfill site on Appleford Road, near Didcot. August 10, 2026: A large fire started at the Greenways Landfill Site (Appleford Sidings) involving non-hazardous processed waste and landfill material, generating a massive smoke plume. Crews contained the main fire by midnight, though a controlled burn/smouldering continued for roughly 12 days September 22, 2026: A separate fire involving green waste occurred at the FCC Environment composting site in Sutton Courtenay, prompting a joint response and investigation by Oxfordshire Fire and Rescue Service and the Environment Agency

Appendix 2

Fires at Sutton Courtenay FCC site summer 2026

