

From: [REDACTED]
To: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [REDACTED]
Subject: Re: EPR/KB3500FS/V003 We Need More Information About Your Application CRM:0229088
Date: 06 March 2026 16:17:52
Attachments: [a4b7da93.png](#)
[Layout plan 1.pdf](#)
[Layout plan 2.pdf](#)
[Photograph No 01.pdf](#)
[Non-technical summary.pdf](#)
[Dust Management Plan V2.2 Mar 26.pdf](#)
[Odour Management Plan V2.2 Mar 26.pdf](#)
[Part F1.pdf](#)
[additional waste codes.pdf](#)
[Waste codes Mar 26.pdf](#)
[Part C3.pdf](#)
[Site condition report.pdf](#)
[BAT assessment.pdf](#)

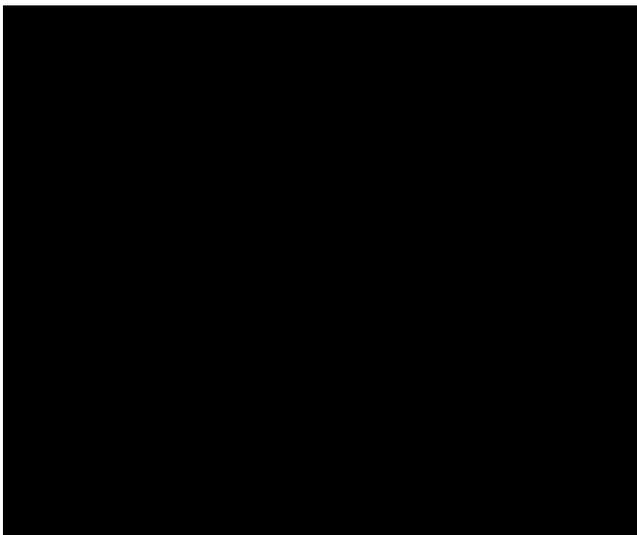
Good Afternoon Francis

Please find attached additional documentation requested for the above application and in relation to the numbered points in your request for additional information below I have the following:

1. Two layout plans have been attached showing the pollution prevention infrastructure and the permit area showing the current permitted area and that which the application proposes to add. The entire site is surfaced with an impermeable pavement and bunded throughout. The area of the site which you describe as a public road is, in fact, privately owned by C O'Donovan & Sons Ltd and has been fenced and gated so no public access is allowed. All the land within the extended permit area is under the control of the applicants. The attached photograph number 01 shows the blocked access at the eastern end of the site. Monitoring infrastructure is shown in the FPP, DMP and OMP.
2. An updated non-technical summary is attached outlining the charges that are required from this application.
3. The D14 disposal code has been removed from the application. C O'Donovan & Sons Ltd will not be repackaging waste prior to disposal. This in turn removes this activity from the permit which reduces the application costs by removing charge reference 1.16.1.3 (see point 10 below). Part C3 of the application form has been amended accordingly and is attached. The site's management documents have also been amended.
4. Amended SCR attached
5. Table 3 of Part C3 of the application form has been updated and attached.
6. BAT assessment attached
7. An updated OMP is attached
8. The waste codes to be added to the permit are attached in the document entitled additional waste codes. The codes that are already on the permit are contained within the document entitled waste codes Mar 26. All the codes marked as hazardous waste relate to the temporary storage of hazardous waste above 50 tonnes (1.16.4).
9. An updated DMP is attached

10. Additional activities have been added to Part F which is attached. The site will no longer be repackaging hazardous waste so the requirements to add this as a new activity no longer apply. The outstanding application fee now stands at £19,971 which has been paid directly by the applicant using reference PSCAPPINSTCODON010 today.

Regards



On 2026-02-20 15:07, SM-Defra-RESP-notifications (DEFRA) wrote:

Dear Simon Walker

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/KB3500FS/V003

Operator: C O' DONOVAN AND SONS LIMITED

Facility: C O'Donovan & Sons Ltd, Ashfield Way, Leeds, LS12 5JB

Thank you for your application received on 22/12/2025.

Unfortunately the application payment you sent is incorrect. The correct application charge is **£53,214**. This leaves a balance of **£35,972** to pay.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions:

1. **Provide an updated site layout plan(s) that shows the boundaries area of the site together with infrastructure for emission control and monitoring (e.g. impermeable surface and containment systems). The new site plan must show clearly the existing site boundary and proposed new site boundary. This must not overlap public road or any land that is not under your control.**

Reason: *The site plan you provided is not a layout plan. It is lacking in detail and is overlapping a public road. This needs to be re-drawn to show the extent*

of the infrastructure and to exclude the public road. The plan should visually differentiate between existing and proposed boundaries and highlight all emission control and monitoring infrastructure.

2. **Amend your Non-technical Summary by providing clear detail of the changes that you want to make as a result of this variation. Where the changes are such that additional fees are payable, must calculate and pay the fee within the deadline specified in this request.**
3. **You requested for D14 (repackaging of waste prior to disposal) and D15 (storage of waste prior to disposal). Please confirm, are you undertaking D14 and D15 activities at the site. is it for hazardous waste or was this included in error?**

Reason: *The documents you provided contain conflicting information about the changes you want to make. We need you to rectify this and pay any applicable fees.*

4. **Amend your Site Condition Report (SCR) and include in it, a Stage 1- 3 assessment. Details of the Stage 1 - 3 assessment are set out within [EC Commission Guidance on baseline reporting \(2014/C 136/03\)](#) dated 6th May 2014:**
 - **Stage 1: Identifying the hazardous substances that are currently used, produced or released at the installation.**
 - **Stage 2: Identifying the relevant hazardous substances.**
 - **Stage 3: Assessment of the site-specific pollution possibility.**

Reason: *This is missing in the SCR you provided.*

5. **Amend Table 3 of the Part C3 Form to include clear references to the standards and appropriate measures that are relevant to the proposed activities at your site.**

Reason: *The appropriate standards and measures are detailed [Waste Treatment BAT Conclusions, Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK](#), and [Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK](#)*

6. **Provide a BAT assessment to demonstrate how your site operations are designed to meet the relevant BAT Conclusions specified in the [Waste Treatment BAT Conclusions](#).**

Reason: *The BAT assessment was not submitted with your application. It must be drafted in line with the [Waste Treatment BAT Conclusions](#). Note that BATs 1 to 24 are generic and are considered to be generally relevant. These need completing even if they are considered not applicable (in which case you will need to indicate that they are not applicable and provide a justification). Other than BATs 1-24, they may be other relevant BATs that are specific to the type of activities that you are undertaken. With reference to BAT 14 in particular, we need you to identify all activities that you are undertaking within the building or enclosure and those that you are undertaking in the open space.*

7. **Provide an Odour Management Plan and pay the appropriate add-on fee of ?1246.**

Reason: An odour management plan is required considering the nature of the new waste codes that you have requested and the screening distance specified in the [Odour management: comply with your environmental permit - 6. Writing an odour management plan - Guidance - GOV.UK](#)

8. **Provide clarity on the new waste codes that you are adding to the permit and distinguish these from waste codes that are already allowed in the permit. Identify clearly the waste codes that are relevant to each activity you have applied for.**

Reason: We need clear identification of the waste codes that are relevant to each activity you have applied for to assess if they are suitable to be accepted.

9. **Provide Dust Management Plan and pay the appropriate add-on fee of £1241. The DMP must follow the format outlined in the attached template.**

Reason: Dust Management Plan is required considering the nature of the new waste codes that you have requested and the screening distance specified in the [Control and monitor emissions for your environmental permit - GOV.UK](#).

10. **Amend Part F Form and pay the following outstanding fees:**
 - **13,519 to add a Section 5.6 activity to the permit (temporary storage of hazardous waste over 50 tonnes at any one time) – charge reference 1.16.4**
 - **16,001 to add repackaging of hazardous waste – charge reference 1.16.1.3.**
 - **3,965 to add new waste codes and increase the throughput of the existing waste operation activity – Charge reference 1.16.12**
 - **An add-on fee of £1246 Odour Management Plan (see reason above)**
 - **An add-on fee of £1246 Odour Management Plan (see reason above)**

Reason: see sections 3.3.2, 3.4.2, 3.7 and 3.8 of the [Charging Guidance](#).

Please reply directly to this email with your information and copy in [REDACTED]

You must send us the information and or payment by **06/03/2026**.

Pay online at this link www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations

You need to create your own reference number. Your reference number must follow this format: PSCAPPINSTXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

Details of how to pay by other methods are given in Part F1 of the [application form](#).

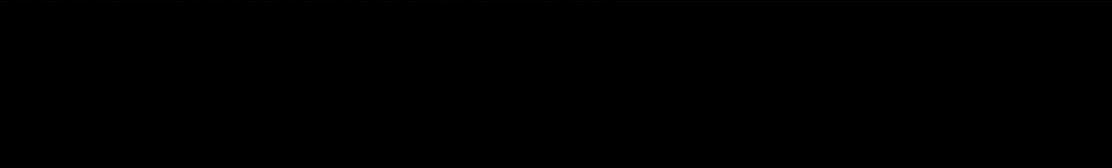
If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,613. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it



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