

# WARD

## Fire Prevention Plan

### Nottingham

#### 1.0 FIRE PREVENTION PLAN PURPOSE & OBJECTIVES

The Fire Prevention Plan (FPP) is a separate document that in conjunction with the Emergency Contingency and Accident Management Plan forms part of the Environment Management System. The FPP sets out the fire prevention measures and procedures in place on site to prevent a fire from occurring and detect, suppress and mitigate in the event one breaks out.

The fire prevention measures in this guidance have been designed to meet the 3 key objectives:

PREVENTION - minimise the likelihood of a fire happening

RESPONSE - aim for a fire to be extinguished within 4 hours

RESPONSE - minimise the spread of fire within the site and to neighbouring sites

There is also a need for emergency preparation and response as it cannot be accepted that all risks are eliminated, and all fires are prevented by following this document. Emergency preparation and response is covered in the Emergency Contingency and Accident Management Plan.

In case of business disruption, Ward have tried and tested contingencies in place to redirect incoming feed to other internal or external facilities or ultimately suspend third party and intercompany deliveries.

Ward is aware of the statutory requirements and other applicable legislation that applies and maintains a legal register as part of internal management system.

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## 2.0 REVIEW

Review of this document will be at least annually, if operations change or after any fire incident.

Change in operations is defined as:

- Additional combustible waste streams will be accepted on site.
- Increased volumes of combustible wastes will be accepted.
- Development of site infrastructure – new buildings.
- Installation of new equipment or fixed or mobile plant.

All relevant parts of the plan will be reviewed. This will include employee training and site monitoring and will also include a review of any relevant associated documents such as the site layout plan. The review will be undertaken initially by the local Site and Senior Management and the EHS Compliance Team will assist as appropriate

## 3.0 SITE ACTIVITIES & TYPES OF COMBUSTIBLE WASTES

### 3.1 SITE ACTIVITIES

The site activities are detailed in the Operating Techniques, but in summary consist of:

- Storage and treatment of ferrous and non-ferrous metals;
- Storage and treatment of general mixed scrap metal;
- Storage and treatment of Waste Electrical and Electronic Equipment (WEEE);
- Storage of components removed from WEEE;
- Storage and treatment of End of Life Vehicles (ELV);
- Storage of ELV residues;
- Storage of Batteries;
- Storage of Tyres;
- Storage and use of non-waste materials e.g. gas cylinders, fuel / oil for use in plant and equipment etc.

### 3.2 TYPES OF COMBUSTIBLE WASTES

Some waste types stored and treated are considered to be combustible e.g.

- Scrap metals contaminated or mixed with other waste such as plastics
- Un depolluted ELVs
- De-polluted ELVs
- Tyres
- WEEE wastes including SMW, ELF and computers and monitors
- Fragmentiser waste and residues
- Quarantined wastes e.g. gas cylinders (not covered by the guidance but considered in the plan)

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- Non-waste materials e.g. gas cylinders, fuel / oil for use in plant and equipment etc.

Fragmentised Ferrous and non-ferrous scrap and clean and uncontaminated scrap metal and furnace ready scrap metal are not considered combustible for the purposes of this protocol.

A fire risk assessment is undertaken and both environment and H&S risk assessments will take into consideration potential for risk of fire from activities.

#### 4.0 TRAINING / USING THE FPP

The FPP forms part of the Environment Management System (EMS). It sets out the fire prevention measures and procedures in place and in use on site. It is a standalone document within the EMS so that it can easily be referred to. All employees will know where it is and how to access it easily at all times and during an incident. (Please see availability of plan section below).

All applicable persons are trained on this FPP via means of a Tool Box Talk (TBT), which are documented and reviewed as part of the internal audit process.

Employees will receive training to enable them to competently carry out the procedures and measures contained within the FPP. This will include New Starters at Induction and for all employees at regular intervals at least annually via toolbox talks, on-site exercises/drills are carried out twice annually as per Emergency Contingency & Accident Management Plan. Training needs are monitored via daily site inspections/ drills etc. and training records are kept.

Visitors are signed in, inducted as required and accompanied whilst on site by an employee who is fully conversant with the plan.

Contractors are made aware of the plan as relevant to their roles/ tasks being undertaken via induction / monitored via permit to work system and also via supervision.

All applicable persons are appropriately trained in respect of their roles and responsibilities.

All employees are trained in respect of their roles relevant to the FPP. Designated employees are trained in the use of firefighting equipment / response strategy. Outside of operational hours, trained employees or external providers will be in place.

#### 5.1. AVAILABILITY OF THE PLAN

A copy of the FPP is provided in electronic format to the Environment Agency (EA) and also will be provided to the Fire Rescue Services (FRS). This will constitute the off-site records. A copy of the FPP is available to all employees and contractors for reference purposes at all times. A copy is available in the Emergency Grab bag located in the weighbridge office and in reception in the event of an incident as shown on site layout plan in appendix 2.

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Drills will take place to test how well the plan works and make sure that employees understand what to do. These drills are twice per year.

## 5.0 SITE PLANS

Appendix 1a & 1b - Plans showing sensitive human and environmental receptors within a 1km radius of the site are contained in Appendix 1 of this Plan. These plans identify any hospitals, nursing homes, schools, residential areas, parks and leisure/recreation areas, surface waters, potable abstractions, protected habitats, fisheries, groundwater SPZ, boreholes supplying water for human consumption etc. within a 1km radius of the site. Transport networks (road, rail etc.) and industrial receptors / workplaces are also visible on the plan as are any electricity pylons (on or immediately adjacent to the site only).

Appendix 2 - Plans showing:

- storage areas with pile dimensions and fire walls (where applicable) – this includes wastes stored in a building, bunker, or containers – include indicative pile layouts and ensure it is geographically representative (e.g.#22 pre-treated SMW storage area has 240min fire resistance)
- any areas where hazardous and flammable materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible wastes, oil and fuel tanks) (e.g. orphaned gas cylinder quarantine #43a, gas cylinders for hot works #44, process areas e.g. Shredder Plant metal treatment #16, chemicals in COSHH #55, piles of combustible waste e.g. Frag Feed #18, SMW #24, oil & fuel in kerosene #12 oil / diesel #13, ELV residues #32);
- all permanent ignition sources on your site and show they are a minimum of 6m away from combustible and flammable waste. (There are no permanent ignition sources).
- any areas where you are treating or storing combustible waste or combustible non-waste materials. (All waste storage areas are shown on the site layout plan in appendix 2. Re treatment #26 ELV treatment building #16 shredder plant metal treatment are shown on plan in Appendix 2).
- all separation distances. (The plan is to scale and the separation is visible, however we have designated on the plan the 6m firebreak between frag feed stockpiles).
- any areas where you are storing combustible liquid wastes (e.g. Kerosene #12 Oil / fuel storage #13 is shown as are ELV residues #32)
- any area where depollution of ELVs take place (ELV treatment building is identified on site layout plan no #26)
- any area where crushing, shredding, baling of metals or ELVs take place. (e.g. shredder #16 there are no crushing / baling activities).
- drainage runs, pollution control features such as drain closure valves, and fire water containment systems such as bunded or kerbed areas (this may be easier to show on a separate drainage plan) (e.g. drainage shown on site layout plan in Appendix 2 – location of drain closure / bung shown #54, bund in car park shown on FPP Firefighting yard)
- the location of fixed plant or where you store mobile plant when not in use (Fixed plant shown on both plans on layout plan tapo #15 shredder #16, ELV treatment #26, airknife #28 etc. location mobile plant when not in use shown site layout #48)

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- the quarantine area. (There are 3 shown on site layout plan #25 temp quarantine #29 hot load quarantine #43 quarantine)

Appendix 3 - Plans showing:

- layout of buildings (FPP Firefighting Equipment Offices Plan shows layout of office building. Firefighting Equipment Yard shows the non-ferrous building #5 and ELV building #26 are open plan).
- main access routes for fire engines and any alternative access points around the site perimeter to assist firefighting. (Entrance gate shown on Appendix 3 firefighting Equipment Yard. Also on site layout plan #1 is labelled entry / exit 24hr available for FRS vehicles)
- hydrants and water supplies (Shown on Firefighting equipment yard)
- areas of natural and unmade ground (On firefighting equipment yard the boundary with boots is shown having trees)
- the location of spill kits – can you add these to firefighting yard plan please
  - anything site specific you consider needs to be added: location of fire-fighting and emergency equipment (including extinguishers / sand)
  - Locations of CCTV cameras on firefighting equipment yard.
  - Electricity and gas shut off points, where applicable,
  - location of emergency assembly point (also contained in the Emergency Contingency & Accident Management Plan)

## 6.0 MANAGE THE COMMON CAUSES OF FIRE

Listed below are the common causes of fire and signposts to the sections in ‘Manage the common causes of fire’ where the preventative measures which are in place to manage the risk are detailed.

- Arson or Vandalism 7.1
- Plant and equipment faults 7.2
- Electrical faults including damaged or exposed electrical cables 7.2 & 7.3
- Discarded smoking materials 7.4
- Hot works welding & flame cutting 7.5
- Industrial heaters 7.6
- Hot exhausts 7.7 see also 7.2
- Ignition sources 7.8
- Batteries in ELVs / Batteries 7.9
- Leaks and spillages of oils and fuels 7.10 also 7.2
- Build-up of loose combustible waste, dust and fluff 7.11 and see also 7.2
- Reactions between wastes (e.g. non-conforming) 7.12
- Deposited hot loads 7.13
- Non-conforming wastes e.g. LPG tanks & sealed cylinders, petrol lawnmowers, batteries 7.12
- Self-combustion (Frag waste) 8
- Sparks from loading buckets 7.2
- External sources of ignition e.g. open burning / fires on neighbouring sites/ fireworks/ lanterns Visitors and contractors 7.4, 7.5, 7.14
- Cylinders stored at the site see Quarantine area & ELV Depollution

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### 7.1. Prevent Arson / Vandalism with Security measures

Security measures are in place to prevent unauthorised access and minimise risk of Arson/ Vandalism. This will include arrangements for outside of working hours.

This will include adequate security fencing, CCTV and where applicable security personnel (CCTV is monitored by security company). The secure boundary comprises a combination of concrete block wall, palisade security fencing, steel plated wall and sleeper walls. The details are shown on the site plan. Site entrance and exit are gated and can be secured.

There will be adequate persons on site to monitor and respond to an event 24/7.

Outside of operational hours (between 17:30 and 07:00hrs), trained employees will be on site who deploy two fully trained firefighters, and a fully equipped major pumping appliance (aka Fire appliance / fire tender / fire truck every evening. In addition, the site has site security contractors who will visually monitor the site using the system of 7 CCTV cameras and will undertake a site inspection every 1.5 hours (8 times per night) which includes looking for signs of fire e.g. smoke or flames. EFS and Security contractors will stay on site until Sims Management team are in attendance.

These cameras are available at strategic locations providing visual coverage of the site including cameras located externally as shown on plan in appendix 2, which will provide wide range of visual coverage of the main external storage areas in the yard including all potentially combustible waste types.

Other security arrangements include that the site is secured outside operational hours to prevent unauthorised access.

### 7.2 PLANT & EQUIPMENT

All employees who operate mobile plant are suitably trained. Refresher training is undertaken routinely as outlined in the EHS Standard. Records are kept.

There is a programme of routine inspection and maintenance for static and mobile plant and machinery. All plant and equipment is inspected before use using the daily plant pre-inspection check sheet. In addition to safety critical checks (brakes, seatbelt, cameras etc.), this inspection includes checking fuel, oil, water & coolant levels and looking for visual evidence of oil leaks, checking hoses and rams for visual evidence of leaks or damage. Records are kept and provided to site manager or designated employee to implement any actions from the inspections.

All mobile plant and equipment is subject to scheduled routine maintenance in accordance with manufacturer's guidelines. Any defects are reported and records of repairs are kept and include Maintenance Assessment and Repair Sheets , reports from service companies etc. This will prevent faults that could cause fire and prevent leaks and spills of combustible fuel and oil.

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The FPP would be reviewed should there be any significant changes to plant / equipment on site however it is noted that it would not be practicable / effective to fit all bucket loaders with rubber strips to prevent sparks when the bucket comes into contact with hard-standing. In general the waste materials handled, being scrap metal are not readily combustible. Nonetheless, employees are appropriately trained and are made aware of the potential risk and to be vigilant during any operation where there is potential for sparks to be generated e.g. bucket of loader making contact with ground. Mobile plant that is not being used is be parked away from combustible waste, in locations shown on plan in appendix 2. This area is a minimum of 6m from combustible waste and buildings and ensures separation distances are observed between plant and waste when the site is not operational. This area will double as the hot load quarantine area. When the plant is in use this area will be available as the hot load quarantine area. The mobile plant will be moved quickly in the event of a fire to free the hot load quarantine area for use.

Ward employees are trained to respond to spills. Spill response procedures are tested twice per year using spill drills. Spill kits are available at strategic locations and all spills responded to. This prevents spilled combustible fuel or oil trailing or being tracked around site. Only appropriate absorbents are used to absorb combustible liquids and once used, these absorbents are stored in drums to reduce the risk of a potential fire situation and correctly disposed of to a suitably authorised facility.

Fire extinguishers are available at strategic locations. Fire extinguishers are fitted in mobile plant and in or by static plant and machinery.

Visual inspections are carried out at regular intervals during the working day and plant operators will regularly inspect their plant to detect the potential for fire caused by dust settling on hot exhausts and engine parts. This takes place at regular intervals throughout operations (a minimum of twice per day) and at the end of the operators shift. Daily routine visual inspections of the site will include a fire watch at least twice per day and at the end of the day and records are made in the site diary / production sheet.

Mobile and static plant and equipment is subject to routine cleaning to prevent accumulation of debris that could settle on hot exhausts and engine parts and potentially cause fire. If daily routine inspections identify an accumulation, additional cleaning takes place before recommencing use.

Fixed plant and machinery used to process the waste are designed specifically for the purpose and constructed to minimise the risk of fire.

The plant is maintained on a regular basis by Ward employees, which includes a qualified engineer, qualified electrician and other suitably qualified employees. Pre-inspection checks are carried out daily when the plant is in use. In addition, regular maintenance is undertaken nightly, the schedule of maintenance is determined by type and volume of material treated.

Only specialist plant and equipment widely used in the waste industry is used to handle wastes (for example JCB, Linde, CAT, Sennebogen, Liebherr or Terex MSH). Mobile Plant routine maintenance /

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servicing scheduling is completed by the manufacturers of the plant or their service providers. In addition, six monthly LOLER inspections are completed.

Fixed plant and machinery used to process the waste are designed specifically for the purpose and constructed to minimise the risk of fire.

The shredder is designed and configured so that heat generated during the shredding process can be released allowing outputs to cool before reaching stockpile storage.

There are 4 types of water system on the shredder:

- 1 Automatic Smart Water System which manages supply water to the Shredder Mill for use in routine operations
- 2 Fire systems supplies water to the shredder mill and output conveyor in event of a fire
- 1 sprinkler system on shredder waste bay which is activated manually in event of fire
- In addition, for the primary purposes of minimising fugitive emissions of dusts, there are sprinklers on trommel, on some of the conveyors and rotary sprinklers on dirt bay that would cover waste and also on the boundary acoustic wall of the shredder.

The shredder and downstream is maintained on a regular basis by Ward employees which includes a qualified engineer, qualified electrician and other suitably qualified employees. Pre-inspection checks are carried out daily when the plant is in use. In addition, regular maintenance is undertaken nightly, the schedule of maintenance is determined by type and volume of material treated.

Housekeeping and cleaning activities are carried out daily by trained employees / suitably trained contractors every night. During this housekeeping process a thorough fire watch is carried out. The housekeeping / cleaning includes removal of loose dust fluff from shredder and downstream equipment. In addition to the daily routine housekeeping, a nightly cleaning rota is in place to thoroughly clean specific areas in rotation.

All employees who operate mobile plant are suitably trained. Refresher training is undertaken routinely and records are kept.

### **7.3 ELECTRICAL SYSTEMS**

Electrical systems are certified by a qualified electrician and there are written procedures in place that set out the regular maintenance, these are summarised below:

Only authorised employees/contractors are allowed to carry out electrical work, including maintenance. A list of authorised employees is maintained.

Permits to Work for electrical work, including maintenance on electrical systems are required and they can only be raised by authorised employees.

Procedures are in place to isolate electrical systems.

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An Electrical Code of Practice has been issued to each contractor and it is adhered to when any electrical work is carried out.

Portable equipment is PAT tested annually, 6 monthly for high risk tools.

Fixed Electrical installations are tested every three years by certified electrician and records kept of testing, registrations and accreditations.

Records are kept.

#### **7.4. DISCARDED SMOKING MATERIALS**

A no smoking policy is in place in operational areas and designated smoking areas are located a safe distance from combustible wastes to prevent accidental ignition. This is communicated to all employees, contractors, visitors as part of site induction.

Employees and contractors are inducted and monitored to ensure they follow safe working practices and are aware of the fire prevention and mitigation plan and emergency contingency and accident plan.

#### **7.5. HOT WORKS**

Hot work is carried out in a designated safe area at least 15m away from combustible stockpiles and with sufficient fire-fighting equipment available. This will include a fire watch by a nominated employee for a suitable period after hot works have ended. Note: This separation is more than adequate to meet EA guidelines that require a minimum of 6m separation between ignition sources and combustible wastes.

Any welding required in operational areas are subject to additional controls e.g. cordoning off area, cleaning to remove combustible materials and damping down if required.

#### **7.6 INDUSTRIAL HEATERS**

Industrial heaters are in use on site to heat areas where employees are working, when the plant is in operation. These are turned off when areas are unmanned. Procedures are in place that set out the use and regular maintenance of industrial heaters.

#### **7.7 HOT EXHAUSTS**

Hot exhausts – see 7.2 Plant & Equipment

#### **7.8 IGNITION SOURCES**

There are no space heaters, furnaces, incinerators and other sources of ignition on site.

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Sources of ignition (e.g. if there were hot works required on site) are kept >6 metres away from combustible and flammable waste. Hot works are conducted a minimum of 15m from combustible wastes, see section 7.5 Hot works.

Waste acceptance procedures will ensure that every effort is made to identify and remove any non-conforming items within accepted waste and remove them from within the waste prior to processing. See 7.12 Waste acceptance, inspection and quarantine for details.

See also section 7.2 Plant and Machinery and 7.4 Discarded smoking materials.

## **7.9 BATTERIES IN ELV**

Batteries are disconnected and removed from un-depolluted ELV without delay following receipt and before ELV are stockpiled for depollution. Batteries will only be disconnected / removed by operatives who have been suitably trained to undertake ELV depollution activities. Batteries are stored in leak proof acid resistant battery boxes.

### **7.9a BATTERIES IN SMALL MIXED WEEE (SMW)**

Batteries are removed from the SMW at the pre-treatment stage, so far as is reasonably practicable. The examples of WEEE likely to contain batteries has been reviewed and expanded. Training has been provided and reminders are visibly displayed in the pre-treatment line.

### **7.9 b ZOMBIE BATTERIES**

We have increased awareness across the business regarding the need to be vigilant for and remove Zombie Batteries present as non-conforming items in scrap metal grades. This would include the pre-treated SMW. Should a battery be identified within a load, the entire load will be quarantined for further stringent inspection.

## **7.10 LEAKS AND SPILLAGES OF OILS AND FUELS**

Procedures are in place to ensure fuels, oils and combustible liquids are appropriately stored to prevent leaks and spills. Storage is at least 6m away from stockpiles of combustible wastes.

Ward employees are trained to respond to spills. Spill response procedures are tested twice per year using spill drills. Spill kits are available at strategic locations and all spills are responded to. This prevents spilled combustible fuel or oil trailing or being tracked around site. Only appropriate absorbents are used to absorb combustible liquids and once used, these absorbents are stored in drums to reduce the risk of a potential fire situation and correctly disposed of to a suitably authorised facility.

See also 7.2 Plant and Equipment, which details daily visual inspections of plant for leaks and also visual checks of hoses etc. for damage / leaks.

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Un-depolluted ELV are inspected for leaks at point of receipt to prevent spills trailing and being tracked about on site. ELV are stored on impermeable surface and further visual checks are undertaken routinely throughout the day, as part of routine fire watch twice during operations and once at the end of the day.

#### **7.11 BUILD-UP OF LOOSE COMBUSTIBLE WASTE, DUST & FLUFF**

Inspections take place daily and housekeeping is regularly undertaken to prevent the build-up of loose combustible waste, dust and fluff on plant, equipment, within buildings and around the site. See also 7.2 Plant & Equipment

#### **7.12 REACTIONS BETWEEN WASTES, WASTE ACCEPTANCE & INSPECTION & QUARANTINE**

The waste types that are accepted on site are neither incompatible with each other nor unstable and therefore there will not be reactions between these wastes. In any event they are stored separately. All relevant employees are appropriately trained in respect of waste acceptance procedures and to identify non-conforming wastes. Records of training are kept.

Written waste acceptance procedures are in place to prevent non-conforming wastes and where these are identified, remove them from the waste stream to minimise the risk of these items causing a fire.

In summary, there is communication with every supplier before a decision is made to accept the waste. Every load is then inspected on numerous occasions by suitably trained employees who control the inspection, reception and validation of wastes, for presence of non-conforming items. Upon arrival at the weighbridge, paperwork is scrutinised & wastes visually assessed so far as is reasonably practicable, an inspection note is issued. Upon receipt at the dedicated waste reception area, wastes are inspected and the inspection note is completed. If the site operative is unsatisfied with any particular item(s) or indeed the whole load, the non-conforming waste procedure below is followed. This ensures the risk of fire is reduced by removing any potential ignition sources, non-conforming items etc. from the waste stream prior to stockpiling.

Further inspection of the waste takes place during the movement/ placement of the waste to the stockpile area or in case of fragmentation, the infeed area for the presence of non-conforming items and as detailed in the Operating Techniques. Where the site receives residues from other shredders and sites undertaking the mechanical treatment of waste, all wastes handled have been received and processed at another facility and so the likelihood of non-conforming items is minimised. Nonetheless, the wastes are inspected as per the waste acceptance procedure and any non-conforming items found are rejected or quarantined as appropriate.

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Suppliers are informed of the waste acceptance criteria and the main material types prohibited are displayed at the site entrance. This procedure prevents any non-conforming wastes that could be incompatible or unstable wastes causing a reaction.

In the event that a suspected hot load arrives on site, this is taken to the hot load quarantine area for further inspection / action as required.

In the event of fire on the site, the planned use of the hot load quarantine area in this scenario is to segregate any burning material or unaffected material with a grab / shunters depending on location of fire so the fire-affected material can be grabbed from the pile and spread out and extinguished. See section 15 for further information on strategy.

A quarantine area is available for small non-conforming items; this is separate from the hot load quarantine area.

Waste acceptance also involves inspecting the load for any signs of fire or hot waste. Please see 7.13 hot load quarantine

A cage is available for the appropriate containment of quarantined orphaned gas cylinders.

### **Waste Acceptance**

All relevant employees are appropriately trained in respect of waste acceptance procedures and to identify non-conforming wastes. Records of training are kept.

Pre-acceptance procedures are in place to prevent acceptance of unsuitable wastes and ensure their suitability for the treatment process. In summary, this will consist of checks undertaken by Commercial/ Site Management and will include information on the composition of the waste, the process giving rise to the waste, the likely quantities and any hazards that may be associated with the waste. These checks are carried out before a decision is made to accept the waste.

Every load is inspected for the presence of non-conforming items and as detailed in the Operating Techniques. Non-conforming items found are rejected or quarantined as appropriate. Suppliers are informed of the ferrous and non-ferrous waste acceptance criteria and the main material types prohibited are displayed at the site entrance. This procedure will prevent any non-conforming wastes that could be incompatible or unstable wastes causing a reaction. Waste acceptance will also involve inspecting the load for any signs of fire or hot waste. Please see hot load quarantine details below.

The waste types that are accepted on site (solid scrap metal, un-depolluted ELV, depolluted ELV, WEEE, lead acid batteries) are neither incompatible with each other nor unstable and therefore there will not be reactions between these wastes. In any event, they are stored separately.

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Any batteries found as non-conforming items are removed without delay and are stored in a leak proof acid resistant battery box.

Small Mixed WEEE (SMW) will have allocated tipping slots for inbound materials to facilitate stockpile management.

### **7.13 DEPOSITED HOT LOADS & HOT LOAD QUARANTINE**

An area on site is maintained as a hot load quarantine area. i.e. somewhere a suspected hot load could be deposited or where unburnt wastes could be moved to isolate and prevent them catching fire.

The area is within the site boundary, is capable of holding 50% of the largest stockpile of waste (i.e. circa 175 tonnes), and is shown on the site plan. A separation distance of at least 6m is maintained around the hot load quarantine area.

Due to the nature of operations and the size of the site, this quarantine area may occasionally need to be flexible in terms of location. If there are any temporary changes to the location of the quarantine area, this is communicated to all employees during the morning meeting and documented in the minutes. Any changes meet the same criteria as detailed above re separation distances/ capacity etc.

The hot load quarantine area or other designated area as detailed above is available at all times, should it be required.

In the event that a suspected hot load arrives on site, this is taken to the hot load quarantine area for further inspection / action as required.

In the event of fire on the site, the planned use of the hot load quarantine area in this scenario is to segregate any burning material or unaffected material with a grab depending on location of fire so the fire-affected material can be grabbed from the pile and spread out and extinguished.

### **Other Quarantine Areas**

There are three types of quarantine area on site: Hot load quarantine area described above, temporary quarantine area and quarantine area.

Separate quarantine areas are available for wastes pending further inspection (temporary quarantine) and for smaller non-conforming items (quarantine area) These are also shown on plan in appendix 2.

### **7.14 EXTERNAL IGNITION SOURCES**

It is not possible to influence/ reduce the likelihood of being impacted by external sources of ignition e.g. open burning / fires on neighbouring sites/ fireworks/ lanterns etc., however what is achievable is to manage and monitor the site to minimise the impact should an external ignition source occur.

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## 7.0 STORAGE TIMES & PREVENT SELF COMBUSTION

Where wastes have the potential to self-combust, these are considered below.

Self-combustion happens when a material, which can self-heat, generates heat at a faster rate than it can be lost to the environment.

EA guidance states, *“many wastes can self-combust under certain conditions. Self-combustion happens when a material which can self-heat generates heat at a faster rate than it can be lost to the environment. The temperature continues to rise in the material speeding up the rate of reaction and releasing even more heat. Eventually the material reaches auto-ignition and the material then self-combusts. You can prevent self-combustion by carefully managing storage times, pile volumes and height, and the temperature of the wastes. To help prevent self-combustion your plan must define the maximum storage time of all materials on site and how you’ll control and monitor this. You must make sure that any combustible wastes are stored for less than 6 months (unless the material is compost and the Environment Agency has agreed that you can store it for longer). Storing combustible wastes for longer than 6 months could increase the likelihood of a fire. If you’re storing combustible wastes in the maximum pile sizes for longer than 3 months, you must show what extra measures you’ll use to prevent self-combustion. For example, this could include monitoring temperatures in the waste.”*

The vast majority of combustible scrap metal stored on site (e.g. shredder infeed) will not self-heat / will not self-combust as detailed above.

### 7.1 FRAGMENTISER WASTE

Fragmentiser waste can generate heat under certain conditions e.g. if stored for prolonged periods of time in large stockpiles. Under normal conditions fragmentiser waste does not self generate heat to a point where risk of self-combustion is likely. Self-combustion is therefore prevented by managing storage times at well below the <3 months specified in the guidance. There are daily movements of wastes from these stockpiles and maximum stockpile times will typically be limited to 1 week to reduce the risk of self-combustion. Storage times are minimised by stock rotation.

The shredder system is configured to allow heat generated during treatment to be released before the fragmentiser waste is deposited into bays for storage. There are daily movements of wastes from these bays and maximum stockpile times is limited to 2 weeks. With daily movements and 1-2 week turnaround, the stockpile durations are well below the <3 months specified in the guidance and this will prevent the risk of self-combustion.

The bays are regularly emptied entirely which ensures stocks are not kept for longer than the 1 -2 weeks specified above.

Stocks are removed from site regularly each week, negating the need for stock turning / rotation.

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Stockpile sizes are as per table below and regular visual monitoring of the wastes will take place. These combustible wastes are stored for < 3months, negating the need for any physical temperature measurements to be taken.

## 7.2 OTHER STOCKPILES OF COMBUSTIBLE WASTE

Unlike fragmentiser wastes that have the potential to self-combust under certain conditions / if stored for prolonged periods of time in large stockpiles, the other combustible wastes stored on site will not self-heat / will not self-combust as detailed above. Regular visual monitoring of the wastes takes place. These combustible wastes are stored for < 3 months, negating the need for any physical temperature measurements to be taken.

To reduce the risk, all combustible materials, stored in maximum stockpile sizes are stored on site for no longer than 3 months, as recommended by EA Guidance. The maximum suggested duration specified in the EA Fire Prevention Plan Guidance for combustible materials is 6 months.

Stocks are removed from site regularly each week, negating the need for stock turning / rotation.

Stockpile sizes are minimised, so far as is reasonably practicable. Wastes are stored in designated areas or bays. Daily site inspections monitor waste storage and check it is in line with the plan. Contingencies are in place in the event that stockpiles near the limits imposed by the plan.

External heating during hot weather has been taken into account and is not considered to be a significant risk to this industry. The waste types are not so combustible as to be affected by hot weather and given the relatively short timescales the wastes are stored on site, the risks are further reduced. It is considered unnecessary to have to shade waste from direct sunlight.

## 7.3 Waste bale storage

Nottingham does not store waste in bales (for example RDF, Cardboard, paper).

## 7.4 Waste ELV bales

Nottingham does not bale depolluted ELV. Nottingham may receive baled ELV which are sourced from ELV ATF suppliers. This ensures they have been treated at an authorised treatment facility before receipt at Nottingham. They are inspected as per waste acceptance procedures. They will be treated alongside Frag infeed so there will be treatment daily and stockpile storage duration will be as detailed in the table and no 3 months as per EA FPP Guidance.

## 9. MANAGE WASTE STOCKPILES

The site takes into account EA guidance to establish separation distances from other stockpiles and from buildings.

Combustible wastes are generally stored in bays or open stockpiles. For storage in bays please see 11.2.

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## 9.1 GENERAL STOCKPILE MANAGEMENT

The planning of site production is the cornerstone for ensuring that stockpiles meet the requirements of this plan in terms of quantity and storage times. At least daily site inspections and monthly stock takes will form the process for this assessment/ review.

Ward has access to adequate resources to facilitate the regular turnaround of combustible wastes on site to ensure storage times are kept to a minimum and maximum storage times (3 months) and stockpile limits are adhered to.

The site is a 'Shredder site', the purpose of which is to treat wastes from Ward feeder yards and other suppliers and dispatch for recovery. As a result, wastes will not be stored for prolonged periods and turnaround is regular.

Shredder infeed will typically be treated daily and stockpiles of infeed are stored for 24 hours.

Stocks of combustible wastes such as Fragmentiser wastes are regularly removed. There are daily movements of wastes from these stockpiles and wastes will generally be stored for around 1 to 2 weeks: far less than the 3 – 6 months limit advised by guidance.

Site Management team visually manage the waste stockpiles on a daily basis and contact Ward Central Planning to arrange for collection of wastes on a routine and regular basis and in advance of approaching the maximum stockpile limits. Removal of the waste is organised by the Central Planning Team, who arrange for transport using either Ward own fleet or other suitably authorised registered waste carriers. The proactive approach to management of logistics between Site Management and Central Planning Team ensures typical operations are maintained and maximum stockpile sizes and storage times are not exceeded.

Small Mixed WEEE (SMW) has allocated tipping slots for inbound materials to facilitate stockpile management. Inward stocks are processed down to the ground / cleared every day. Should any unprocessed SMW remain on site at the end of shift / when the treatment plant is not staffed, we will increase visual inspection of the area to improve chances of early detection, should a fire occur. This includes extending CCTV coverage and allocating responsibility Employees to regularly check for signs of fire.

In the event of extenuating circumstances, Ward prioritises supply streams, holding wastes at supply sites and diverting to a network of third party facilities. For example, if stockpile limits were reached (e.g. if receiving facilities were unable to accept the wastes or there was a significant failure in logistics) or in the event of an emergency and the site had to cease waste acceptance.

Ward has a network of other scrap metal yards to which wastes can be diverted in event of extenuating circumstances. For example, if stockpile limits were reached (e.g. if receiving facilities were unable to accept the wastes or there was a significant failure in logistics) or in the event of an emergency and the site had to cease waste acceptance.

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The materials received are not subject to substantial seasonal variation in demand and/or supply. Ward has a breadth of experience managing scrap metal / waste and can effectively manage any seasonality of supply/off-take etc. throughout our network of facilities/ contacts, demonstrating that our waste management is viable.

## 9.2 MANAGE STOCKPILE SIZE AND LOCATION

Potential stockpile sizes, storage methods/types and appropriate separation distances have been identified and used to plan the storage arrangements. The location of storage areas and site infrastructure are shown on site layout plan in appendix 2.

Factors such as active firefighting/ access, egress & escape routes/ locations of buildings/ plant and equipment/ potential ignition sources, flammable materials and hazardous substances kept on site such as gas cylinder cages, diesel tanks, quarantine areas which may contain non-conforming wastes/ operational practicalities such as movements of vehicles & designated routes etc. have been taken into account when deciding the site layout and stockpile locations.

Stockpiles are located so as not to compromise access to firefighting equipment.

EA guidelines as detailed below for combustible wastes are detailed below.

4 m and stockpile dimensions 20m * 20m for combustible wastes detailed below. Combustible waste type	EA guide	Other notes
WEEE containing plastics, including fridges, computers and televisions	450 cubic metres	
Tyres and rubber	450 cubic metres	50 tonnes
Metals other than WEEE (including crushed ELVs, which are classed as 'baled' waste for the purpose of this table.	750 cubic metres (450 cubic metres baled )	
Fragmentiser fluff	450 cubic metres	

Stockpiles are stored in accordance with the guidelines in the table above and all combustible wastes are stored for <3 months. Daily stock take, stock tracker and monthly stock take will be used to ensure all combustible waste types are monitored and stored for <3 months.

Specifically, unprocessed and processed / pre-treated SMW stockpiles will be stored in accordance with EA guidance of 450m<sup>3</sup> stockpiles with height no greater than 4m. Frag infeed stockpiles will be stored in accordance with EA guidance of 750m<sup>3</sup> stockpiles with height no greater than 4m. Frag wastes and residues will be stored in accordance with EA guidance of 450m<sup>3</sup> stockpiles with height no greater than 4m.

Hazardous / combustible wastes e.g. SMW & un-depolluted ELV, are stored in their largest form prior to treatment processes which will remove the hazardous components.

Lead Acid Batteries, ELF, TV and Monitors, but also combustible non-hazardous wastes e.g. tyres are not treated on site and are stored in their largest form prior to removal to a suitably authorised facility.

End of Life Fridges (ELF) are stored in external stockpile (rows) separated from other wastes by 6m firebreak.

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End of Life Vehicles (ELV) are stacked 2 high and in rows 2 wide so that each ELV are accessible from one side for firefighting in event of a fire.

Tonnage restrictions for any particular waste type on the site may change depending on the particular materials stockpiled and yard conditions at the time. However, these are dependent on checks being in place to ensure safety at all times and those with potential hazards to be kept away from pedestrian areas/working areas.

Care is taken to ensure that waste is stored in a safe manner and there are no signs of stockpiles being unstable.

The maximum quantities of wastes stored onsite at any one time and maximum stockpile sizes are:

Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration
Shredder infeed will contain a proportion of wastes considered combustible e.g. depolluted / baled ELV	Typically, this will not exceed 1050 tonnes. 1400 tonnes in extenuating circumstances e.g. breakdown.	350 tonnes of frag infeed / will not exceed 750m <sup>3</sup>	20m*20m*4m	Typically are processed daily / 24 hours. This is far lower than EA guidance 3 months. Will not exceed 3 months
Pre-treated SMW (that has been manually pretreated)	200 tonnes	110 tonnes / 450m <sup>3</sup>	15m*15m*4m	Processed daily. Typically not exceeding 1 week. Will not exceed 3 months
Fragmentiser Residues and Wastes	Typically 1000 tonnes, in extenuating circumstances 2,500	150 tonnes / will not exceed 450m <sup>3</sup>	Current Bay dimensions: 9m*6m* 4m high 10.5m*9m 4m high 8m*6.5m*4m high 6m*15m*4m high + 19m*5m*4m high New bay 20m*9m*4m to replace preceding bay.	Daily movements, stock rotation, maximum duration 2 weeks.
Swarf	120	120	Bay dimension 4.5*7.5 *12m*4m high	Typically monthly will not exceed 3 months
Tyres	Typically 20 tonnes onsite at any one time, stored in stable stacks or a skip, in extenuating circumstances 50 tonnes	10 tonnes	50m <sup>3</sup>	Will not exceed 3 months

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ELV	50	16 ELV	2 high and 2 wide so can access from sides	Typically 1 week will not exceed 3 months
Waste oil	10,000 litres in bunded tanks			Typically 6 months will not exceed 12 months
Waste petrol	4,000 litres in bunded tanks			Typically 6 months will not exceed 12 months
Waste diesel	5,000 litres in bunded tanks			Typically 6 months will not exceed 12 months
Waste coolant	7000 litres in bunded tanks			Typically 6 months will not exceed 12 months
Brake Fluid	5000 litres in bunded			Typically 6 months weeks will not exceed 12 months
Air Con gases	100 kg in 12 kg cylinders			Typically 6 months weeks will not exceed 12 months
Oil filters	500 kg in 205 l drums			Typically 6 months weeks will not exceed 12 months
Lead acid batteries	50 tonnes – typically there are circa 20tonnes on site	20 tonnes	20m*2m*2m	Typically 1 month will not exceed 3 months
ELF	5 tonnes – typically there are less.	Will not exceed 300m3. Typically 105m3	10m*3m*3.5 ELF will not be stacked higher than 3.5m	Typically 2 weeks will not exceed 3 months
SMW/ SDA untreated	200 tonnes	110 tonnes / 450m <sup>3</sup>	15m*15m*4m	Processed daily. Typically not exceeding 1 week. Will not exceed 3 months
Components removed from SMW	50 tonnes	Stored in separate containers 10 tonnes in any one		Will not exceed 6 months
Temporary Quarantine (wastes pending further inspection)	25 tonnes	25 tonnes	6m*2.4m*3m	Typically will not exceed 1 week
Quarantined waste/ orphaned gas cylinders	5 tonnes (no more than 2 tonnes gas cylinders in cages)	1 tonnes cylinders 4 tonnes other quarantine	3m*10m*2.5m approx.	Will not exceed 6 months
Non-ferrous – clean and uncontaminated NF not considered combustible for purposes of this plan	500 tonnes	150 tonnes	N/A	Typically 1 month will not exceed 6 months
Processed Fragmentised ferrous clean and uncontaminated/ furnace ready and not considered	3000 stored at radial stacker and a further 22,000 tonnes on site	22,000 along rail	N/A	Processed frag are routinely moved from the stacker to the storage ferrous storage area (see

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combustible for purposes of this plan				below). 24hours	e.g.
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\*these are maximum dimensions

The above dimensions meet the EA guidance for all waste types.

The environment management system will minimise the likelihood of a fire occurring through:

- Robust waste acceptance and inspection to minimise risk of non-conforming wastes (as detailed earlier in this FPP and in the operating techniques) Ward will identify items that could potentially cause an issue and remove them from the waste stream;
- By controlling of potential ignition sources (as detailed earlier in section 7 of this FPP);
- Through inspection and management of stockpiles - wastes are treated daily and shredder infeed storage duration is typically 24hrs which is far lower than the 3 months specified in the guidance (please see manage stockpile durations below for more details). Stockpiled wastes are regularly inspected. A fire watch will take place as part of daily routine visual inspections of the site at least twice per day and at the end of the day. During the fire watch, the stockpiles, plant, and equipment are thoroughly inspected for signs of fire or potential causes of fire. As detailed in waste acceptance procedure, wastes are visually inspected again for non-conforming items as part of the handling process. Any non-conforming items found are removed to quarantine.

Site management visually assess stockpile size, volume during the daily inspections and this information is used to determine / update production / logistic requirements. Fragmentiser infeed is processed daily. In the event stockpile size is approaching maximum, another stockpile will be created.

In addition, firebreaks and emergency preparedness and response equipment and procedures will minimise the spread of the fire within the site and to neighbouring sites and fire stockpiles are manageable by resources on site so that, should a fire break out, it could be extinguished within 4 hours.

Resource is available (plant & employees) to split up a pile and segregate from burning material in event of fire to minimise spread / extent of affected waste.

Water tanks are strategically located in close proximity and emergency responses are tested.

Further liaison with Fire and rescue service will take place to discuss and agree strategy.

Ward are confident that using a combination of the above techniques, if a fire were to occur, that it could be detected quickly, and that response would be rapid during and also outside operational hours. That operatives would use on site resources / mobile plant to minimise the spread by moving waste to minimise stockpile sizes / create additional or larger fire breaks / assist the responders to pull down and extinguish any fire affected scrap.

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## Manage stockpile durations and storage times

Combustible waste storage times are kept to a minimum.

Infeed stocks are treated daily. Regular visual monitoring of the wastes will take place, the stockpiles will be stored for much less than the 3 months recommended by guidance, negating the need for any physical temperature measurements to be taken.

The physical structure of the stockpiles (large metal pieces of varying shapes) means that monitoring with temperature probes is not practicable. A handheld thermal detector will be used by Ward employees for monitoring stockpiles of combustible wastes once per day to identify any hot spots.

To reduce the risk, all combustible materials stored in maximum stockpile sizes are stored on site for no longer than 3 months, as per EA guidance. The maximum suggested duration specified in the EA's Fire Prevention Plan Guidance for combustible waste is 6 months. EA guidance advises that storing combustible wastes for longer than 6 months could increase the likelihood of a fire. EA guidance also advises if storing combustible wastes in the maximum pile sizes for longer than 3 months, extra measures must be demonstrated to prevent self-combustion. Combustible wastes stored in maximum pile sizes will be stored for less than 3 months.

Nottingham will store combustible wastes for generally between 24 hours and 2 weeks. At this frequency of turnaround, the risk are greatly reduced.

Fragmentiser waste can generate heat under certain conditions. Self-combustion is prevented by managing storage times at well below the <3 months specified in the guidance. There are daily movements of wastes from these stockpiles and maximum stockpile times are limited to 1 to 2 weeks to reduce the risk of self-combustion. Storage times are minimised by stock rotation and will not exceed 2 weeks.

Fragmentiser infeed / Light iron are processed daily and where possible, shredder infeed is processed within 24 hours of receipt. Light Iron will not be stored for greater than the 2 weeks maximum even in extenuating circumstances. Typically, inward stocks of Light Iron are processed down to the ground / cleared within 24hrs. This will eliminate the need to carry out full and frequent stock rotation, or to have a first in, first out policy as all waste will be cleared every 24hrs. Should a circumstance arise when any unprocessed Light Iron will remain on site for longer than the 24hrs, we will increase visual inspection of the area to improve chances of early detection, should a fire occur. This includes allocating responsibility to Employees ( & security) to regularly check for signs of fire.

Small Mixed WEEE (SMW) will have allocated tipping slots for inbound materials to facilitate stockpile management. Inward stocks are processed down to the ground / cleared daily. This will eliminate the need to carry out full and frequent stock rotation, or to have a first in, first out policy as all waste will be cleared daily. Should a circumstance arise when any unprocessed SMW remain on site at the end of shift / when the treatment plant is not manned, we will increase visual inspection of the area to improve chances of early detection, should a fire occur. This includes allocating responsibility to Employees (and security) to regularly check for signs of fire. The same is true of the processed / pre-treated SMW

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stockpiles.

The SMW and the shredder infeed / Light Iron stockpile areas are the areas that will be covered by the automated detection and suppression systems. These stockpiles are areas of focus.

These durations are far lower than the three to six months recommended by EA Guidance and at this frequency of turnaround, the risks are greatly reduced.

## **10. WHERE MAXIMUM PILE SIZES DO NOT APPLY**

### **10.1 Whole ELV**

End of Life Vehicles (ELV) are stacked 2 high and in rows 2 wide so that each ELV are accessible from one side for firefighting in event of a fire.

### **10.2 Waste stored in containers**

Combustible wastes stored in skips or containers e.g. tyres are stored in skips that are accessible so any fire that should occur inside it can be put out. The tyre skip/s are 6m from ELV building.

## **11. PREVENT FIRE SPREADING**

There are two main ways detailed in guidance to prevent fires from spreading – separation distances and fire walls and bays.

### **11.1 SEPARATION DISTANCES**

Combustible waste in open stockpiles (e.g. frag feed, SMW) are stored with a separation distance / fire break of at least 6 metres from other combustible waste piles, buildings, flammable materials and the site boundary as shown on plan in appendix 2. Output bays are not used for waste storage.

The frag infeed piles are separated from each other by 6m separation distance. This has been marked on the plan in appendix 2.

Sources of ignition are kept at least 6 metres away from combustible and flammable waste.

Procedures are in place to ensure fuels, oils and combustible liquids are appropriately stored to prevent leaks and spills. Storage is at least 6m away from stockpiles of combustible wastes.

Combustible wastes are stored with a separation distance of 6m from site boundary as shown on plan. Non-combustible waste are stored along boundary with JMC & EMR where there isn't the separation distance. The swarf bay will also be located along the boundary with JMC Recycling Systems. The location of this bay is determined by the infrastructure & connection to the tank.

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There are 6m breaks between externally stored stockpiles of combustible waste e.g. Shredder infeed, SMW, pre-treated SMW. These are shown on the plan in appendix 2.

The previous steel wall and concrete bunker for the storage of processed SMW waste (clad with steel plate and extended alongside the infeed conveyor to offer improved containment and to prevent the potential for the spread of fire to the other side of the conveyor and other stockpiles with a core made from concrete and has a fire resistance of 1.5hrs) has been replaced with bay constructed as specified in section 11.2 below.

The Infeed conveyor has been replaced and plates installed to prevent debris from getting under the conveyor. These improvements ensure that wastes are contained and clear fire-breaks are in place to segregate the SMW waste from other wastes and to prevent fire spreading.

Frag infeed stockpiles will be stored in accordance with EA guidance of 750m<sup>3</sup> stockpiles with height no greater than 4m and 6m separation. Frag wastes and residues will be stored in accordance with EA guidance of 450m<sup>3</sup> stockpiles with height no greater than 4m and 6m separation (or in bay with 240 minutes fire resistance).

SMW stockpiles will be stored in accordance with EA guidance of 450m<sup>3</sup> stockpiles with height no greater than 4m and 6m separation. Pre-treated SMW stockpiles will be stored in accordance with EA guidance of 450m<sup>3</sup> stockpiles with height no greater than 4m and 6m separation (or in bay with 240 minutes fire resistance).

End of Life Fridges (ELF) are stored in external stockpile (rows) separated from other wastes by 6m firebreak.

End of Life Vehicles (ELV) are stacked 2 high and in rows 2 wide so that each ELV are accessible from one side for firefighting in event of a fire.

Combustible wastes stored in skips or containers e.g. tyres are stored in skips that are accessible so any fire that should occur inside it can be put out. The tyre skip/s are 6m from ELV building.

Wastes are stored 6 metres from buildings except for un-depolluted ELV which are located 4m from the ELV building and 6m from other combustible or flammable materials as shown on plan. 4 metres is sufficient to facilitate access and these ELVs can be moved quickly and easily, should this be required.

A small quantity of wheels are stored in ELV building pending de-rimming. A small quantity (max 6) of secure destruction vehicles may be stored within the ELV building. Storage would be limited to maximum of a week, typically a day or two. CCTV in the ELV building are monitored by site and security will inspect this area regularly as part of routine inspections.

Batteries are stored drums at the SMW plant and toner are stored in bags at the SMW plant. There is some battery storage in ELV building also as shown on plan in appendix 2.

Batteries are stored separate by hazard and in drums or containers with lids or undercover.

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Monitors are stored undercover at the SMW plant in small quantities and also in the storage area in storage bags or stillages/ boxes as appropriate.

Smoke detectors are stored in Non Ferrous building with batteries removed.

Waste / orphaned gas cylinders are stored in lockable cage.

Combustible materials for use on site e.g. Kerosene / gas cylinders etc. are appropriately stored. Gas cylinders for use are labelled and stored upright in appropriate cages at locations shown on site layout plan in appendix 2. Kerosene / oil / diesel are stored labelled in appropriate bunded storage. Chemicals are stored in a COSHH Cabinet.

## 11.2 FIRE WALLS AND BAYS

Regarding bay construction, bays for pre-treated SMW #22 on plan in appendix 2 and Fragmentiser Waste #27 on plan in appendix 2 are constructed of interlocking concrete blocks that provides equivalent of class A1 fire resistance in accordance with clause 4.3.4.4 of EN13369. This will offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat. The blocks have 240 minute fire resistance and this has been confirmed by the manufacturer / installer. The installation of the bays is complete.

When installing such products, the installation method used is in line with the manufacturers recommended installation requirements. The design of the bays and their installation is certified by the installer to meet a minimum 240 minutes fire resistance.

The bays are designed to keep the wastes isolated, whilst allowing adequate access in event of fire to enable a fire to be extinguished within 4 hours.

Wastes will be stored within the bays and checked regularly and at the end of each shift, to ensure they are adequately contained. Housekeeping implemented as required to ensure wastes remain within the bay to prevent spread of fire outside the bay walls / to adjacent bays, should a fire occur.

The frag waste bay is separated from the SDA residue bay by bay walls with minimum fire resistance 240mins.

The Pre-treated SMW bay is separated from adjacent Frag feed bay by bay walls with minimum fire resistance 240mins. The pre-treated SMW in the bay will be separated from the pre-treated SMW output stockpile by minimum 6m separation distance as shown on the plan in appendix 2. Output material will be moved into bay storage. If an output pile remains it will be separated from the pre-treated SMW bay face by minimum 6m separation distance.

Segregation of materials is ensured by storing in designated areas, bays or containers. This is checked by daily site inspections. See site layout plan in appendix 2 where 6m separation between fragmentiser infeed piles has been denoted.

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Combustible waste are stored with a freeboard space of 1m at the top and sides in accordance with latest available guidance and this will prevent fire bridging / spreading.

The integrity of the bays will be visually inspected on a monthly basis and any repairs / maintenance undertaken as required.

## 12. QUARANTINE

See section 7.12 and 7.13. The volume of the quarantine area is 50% of maximum stockpile size (175t / 375m<sup>3</sup>).

## 13. DETECTING FIRES

The FPP ensures that adequate procedures are in place to detect a fire in its early stages so as to reduce its impact.

The detection systems on site are visual. This is appropriate to the nature and scale of the waste management operations for the majority of waste types and stockpiles on site. During operational hours, the site management team will visually monitor stockpiles, plant, and machinery. Outside of operational hours, security contractors will visually monitor the CCTV and undertake routine site inspections.

The site is staffed by Sims employees from 06:30 – 01:00 hours Monday to Friday and it is the aim of site management team to have minimal stockpiles left on site at weekends.

Fragmentiser infeed and Fragmentiser waste - Visual inspections will take place frequently and at least twice daily, during operation and at the end of the day.

The Fragmentiser waste bays will have a manual suppression system. In the event of a fire, water would be dispensed using a rotary sprinkler system and hoses attached to 50,000 litre tank.

Procedures are in place during and following hot works to monitor and detect the outbreak of fire.

A fire watch will take place as part of daily routine visual inspections of the site at least twice per day and at the end of the day.

During the fire watch, the stockpiles, plant, and equipment are thoroughly inspected for signs of fire or potential causes of fire. On mobile plant, this will include checking for accumulations of debris on areas of the equipment that will get hot during operation. In stockpiles, this is undertaking inspections for signs of fire and for non-conforming items that could be sources of ignition.

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In addition to undertaking routine fire watch, every load is inspected in accordance with waste acceptance procedures where a thorough visual inspection is made at point of receipt, during any handling/ stockpiling activity and again when loading. Employees are trained to be vigilant for non-conforming items.

Outside of operational hours (between 17:30 and 07:00hrs) the site is staffed by site security contractors who will visually monitor the site using the system of 7 CCTV cameras and will undertake a site inspection every 1.5 hours (8 times per night) which includes looking for signs of fire.

These cameras are available at strategic locations providing visual coverage of the site including cameras located externally as shown on plan in appendix 2, which will provide wide range of visual coverage of the main external storage areas in the yard including all potentially combustible waste types.

Inspection of fragmentiser infeed & fragmentiser waste stockpile during night are undertaken by contracted security.

Security Contractors are instructed to call the FRS immediately upon detecting a fire and they will have details of who to contact at Ward in event of an emergency out of hours.

In addition to the above, all employees are trained in Emergency Procedures and to be continuously vigilant for any signs of fire. This will extend to site security where responsibility is allocated.

#### **Untreated SMW, pre-treated SMW and light Iron stockpiles**

In addition to the visual checks, a handheld thermal detector will be used for monitoring stockpiles of combustible wastes once per day to identify any hot spots.

If an area of concern is identified, it would be revisited and checked again later in that day.

If a hotspot is identified, a water source will be brought to the area, the hotspot will be removed from the larger stockpile to facilitate cooling. The removal of the waste from the stockpile is likely to be sufficient to cool, the water is a precaution, should ignition occur.

In the event that stocks of combustible waste are stored for greater than 3 months, the frequency of the checks using the handheld thermal detector will be increased to twice per day to identify any hot spots.

Records will be kept.

#### **14.0 SUPPRESSING FIRES & STORAGE OF WASTE IN A BUILDING**

Manual firefighting techniques are implemented in the event of a fire. For the majority of wastes stored, automatic suppression systems are not considered proportionate to the nature and scale of waste management activities that are carried out and the associated risks. At Nottingham, the

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untreated, pre-treated SMW stockpiles and light iron stockpile are identified as higher risk and are being reviewed in respect of designing and installing an automatic detection and suppression system.

Reasoning for manual only fire suppression systems elsewhere on site:

The risk associated with other waste types is much lower. Management practices as detailed above will ensure stockpiles of potentially combustible wastes are kept low and regularly removed from site.

Maximum storage times of potentially combustible wastes (24 hours to 2 weeks) are far shorter than the 3 – 6 months recommended by EA guidance. Management practices as detailed above will ensure that the common causes of fire are managed and the risk /likelihood of a fire are minimised.

Potentially combustible wastes are regularly monitored both during and outside operational hours for signs of fire.

Potentially combustible waste types are stored in external stockpiles with firebreaks and access is maintained for emergency vehicles meaning that there would be no potential restrictions/ limiting access factors, which would prevent a fire being tackled effectively.

If a fire were to occur, its spread would be minimised by effective emergency response as detailed in the Emergency Contingency and Accident Management Plan and the provision of fire breaks.

The size of the stockpiles is minimised and will ensure any fire could be extinguished quickly and within 4 hours.

## 14.1 WASTE IN A BUILDING

### Operational Buildings

There is the requirement to store small quantities of certain wastes types within buildings as detailed below:

Non-ferrous wastes in the non-ferrous building are subject to a robust waste acceptance and inspection criteria. Each load is carefully inspected and the wastes graded and stored separately by grade. This will ensure the wastes will not contain any non-conforming items or potential ignition sources. Small quantities of non-ferrous swarf are stored in bags in the non-ferrous building. These volumes are small and turnaround frequent.

Smoke detectors – batteries removed are stored in small quantities in the non-ferrous building <500 detectors.

Small amount of components removed from ELV are stored in the ELV building e.g. batteries/ oil filters and small amounts of fluids in kulis. In exceptional and extenuating circumstances e.g. confidential destruction contract, a few ELV may be stored in the ELV building. Lead acid batteries, are stored upright in leak proof, acid resistant dedicated battery boxes. The storage methods will ensure the risk of short circuit/ fire is minimised. The quantity stored in the building are low. The area is regularly inspected and is covered by CCTV and monitored outside of operational hours by security. The risk will therefore be

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low and the use of automated detection / suppression systems in the buildings will not be proportionate to the nature and scale of the risk.

Overall, the risk will therefore be low and the use of automated detection / suppression systems in the buildings will not be proportionate to the nature and scale of the risk.

All escape routes, fire exits and fire extinguishers are kept clear and free from waste at all times.

There are no heaters in the waste storage areas. Any electrical equipment present is kept free from waste, including dust and packaging materials. All electrical equipment is tested as specified in plant & equipment.

Operational buildings have roller shutter doors, which can be opened as a means of access for fire fighting and as a means of clearing smoke from the building. There is separate pedestrian access.

### **Office areas / buildings**

The office area and mess facility are completely compartmentalised from any operational areas. Fire Alarm system in office building and yard is tested weekly. Drills are undertaken.

### **15. Fire Fighting Equipment & Strategy**

The site Environment Management System (EMS) is designed to prevent fires or if a fire occurs, to identify it without delay and tackle in its infancy to minimise impact. The Environment Agency will be informed without delay should a fire occur via calling the Environment Agency incident hotline: 0800 80 70 60 (24-hour service). The Site Manager or deputy will be responsible for informing the Environment Agency. Protecting the health and safety of people on site is the priority in the event of a fire.

The business has made significant investment in developing its innovative active fire prevention and firefighting strategy known as the zero-2/5/20 strategy. Like all waste businesses, Ward has seen an exponential increase in fires caused by lithium- ion batteries.

It quickly became clear that this measure was just a small part of a much more comprehensive solution built around a stronger emphasis on preventing fires (zero fires), supported by 3 objectives, which are:

- Create a capability for early detection of fires (within 2 minutes)
- Create a capability to commence early fire suppression with 5 minutes.
- Create capability to contain a fire until the fire services attend (20 minutes), and then ensure effective operational handover to the Fire & Rescue Service (FRS)

The business has engaged independent firefighting experts to advise/support the business on the execution of the zero-2-5-20 strategy. Minimising the likelihood of a fire happening is the highest priority

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to prevent environmental harm. The site layout allows for active firefighting. This enables fire to be extinguished within the shortest time possible. Resources are available to fight a fire including plant and trained operatives to move waste to quarantine area and to isolate any bays with burning waste during an incident:

- Quickly and effectively remove wastes at risk of ignition / separating unburned material from fire affected material, applying water to cool unburned material and other hazards (only when necessary to prevent spread of fire, to minimise amount of water used so as not to add unnecessarily to water volume / pollution)
- Separating burning material from the fire so it can be quenched with IBC water / extinguishers or hoses or to assist the FRS if Fire Rescue Service are in attendance.

**Fire Prevention (zero fires)**

Our zero fires element of our strategy requires a focus on 3 key areas.

- Consistent and competent execution of policy and procedures.
- Learning from incidents and near misses.
- Learning organisation.

**Consistent and competent execution of policy and procedures.** Site managers and supervisors constantly monitor the day-to-day application of good housekeeping. Our out of hours fire professionals also give independent feedback if they observe any areas of concern, or opportunities for improvement. We have a clear policy framework of checking and maintenance of all fire safety/firefighting equipment.

**Learning from incidents and near misses.** All staff are regularly trained in initial firefighting, in line with Ward policy. Any incident or near miss that occurs is investigated, and any lesson learned are feedback through the site and the business, using internal communication systems. Independent fire investigation specialists are engaged if there is any concern that the cause of fire may have wider implications.

**Learning organisation.** The business has engaged independent fire specialist consultants with a strong background in fire engineering, fire safety, firefighting, fire investigation and training. The company also have a strong background in environmental regulation and protection. Their function is:

- To ensure the business is adopting best practice and innovation in its fire safety approach.
- To independently audit, validate and assure site fire safety systems
- To support roll out of the zero-2-5-20 strategy across the business.
- To support improved local and national relationships with fire and rescue agencies
- To mentor and monitor the performance of private fire services at high-risk sites
- To support effective operational response, and post incident clean-up/investigation
- To identify any opportunity to enhance or improve fire safety, and to support the sharing of learning across the whole waste industry.

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Our risk analysis clearly demonstrates that the risk of fire is low during working hours for the site, for obvious reasons. The resources onsite and readily available include:

- plant to move waste around the site, for example loaders, excavators, material handlers
- trained staff with firefighting equipment and training
- available water supply

These staff are trained to use a variety of techniques such as:

- applying water to cool unburned material and other hazards
- separating unburned material from the fire using heavy plant
- separating burning material from the fire to quench it with hoses or tanks of water.

### **Detecting Fires & Response Procedures**

#### **Automatic Fire Detection and fire suppression main high-risk areas**

Storage area - An automatic thermal scanning system has been installed to cover the main storage area of the site. In broad terms, the system consists of fire detecting cameras which can initiate and control a water-based and accurate fire attack. The intention is to achieve coverage of stockpiles of SMW unprocessed, pre-treated SMW & the Light Iron infeed areas.

The system can distinguish between a real fire and a false alarm (such as reflected sunlight). Water cannons have been installed and are integrated with the Thermal Fire Detection system. If a potential fire is detected an automated water cannon system is activated which will quickly apply water in a targeted manner to cool the "hot spot" area.

Mobile plant- A second high-risk area is the potential failure of mobile plant. The business is currently in the process of procuring an automatic fire detection and attack system for all new equipment and key existing equipment.

ELV - It is recognised that FPP guidance points to the use of water as the primary firefighting intervention. The business may adopt a waterless firefighting technique for its ELV areas, based on the direction of travel for operational tactics of fire agencies, who are moving towards the use of fire blankets as the preferred operation a tool for car fires.

#### **Fire detection procedure (manual)**

In addition to these automated systems, Ward employees are trained to respond to fires. In case of a fire, breaking out the Emergency Controller (or deputy) is alerted immediately, and the onsite fire-fighting equipment is employed. The Emergency Contingency and Accident Management Plan is initiated. Fire-fighting equipment is located at strategic locations near to areas of combustible waste storage to aid rapid response to suppress a fire. Fire-fighting equipment consists of:

- Portable extinguishers in or strategically located near items of plant / equipment and at various locations throughout the site as shown on plan in appendix 3.
- Water tanks and hoses at strategic locations as shown on plan in appendix 3.
- A fire suppression system on the mill is manually operated by the shredder operator.

The Fire Rescue Service are called when deemed necessary by the Emergency Controller.

In worst case scenario, if a fire was to occur that could not be tackled quickly and safely using on site resources then the fire rescue service would be called. The Nottingham Fire and Rescue Service are located nearby on Hassocks Lane, Beeston, NG9 2G

### **Out of hours fire detection and response**

The site has permanently monitored CCTV in place. In addition to these local measures, and as a clear demonstration of our commitment to our zero-2-5-20 strategy, the business has engaged a professional firefighting capability located at the site outside of operational hours, who undertake 3 primary roles.

- Early fire detection (waking watch)
- Early intervention/suppression
- Effective operational handover

A firefighting team of fully trained personnel includes the provision of a fully equipped major pumping appliance (aka Fire appliance / fire tender / fire truck). This resource is deployed on site and is crewed outside of operational hours. The team will consist of two persons with suitable and sufficient PPE.

The firefighting strategy is both proactive and responsive. Persons will position the site fire appliance in a designated area based on risk assessment (typically near to the shredder and higher risk combustible waste storage areas i.e., SMW, Light Iron) to minimise the time taken to deploy it to the affected area in the event of an incident.

Throughout the shift all persons will ensure that the fire Appliance pump and equipment is maintained in operational readiness as fire appliance on-board water supply will be used in the first instance to fight a fire event. The Fire crew will also check onsite water valves and hose reels at start of every shift. Ward firefighting hoses will be made ready in the event they are needed to respond. There is a handover procedure which consists of thermal scanning as part of the site closure procedures.

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As part of a waking watch (Firewatch) routine, we use the latest handheld thermographic technology available and undertake regular thermal scanning patrols to identify hotspots or unusual temperature activity.

Persons will be fully trained in Dynamic Risk Assessment (DRA). Thermal Image Camera will be checked and kept always charged.

### **Early Intervention/Suppression**

On detection of a confirmed event, the firefighting team will attend, and deal with the incident based on a DRA. As part of that DRA, they will consider the potential need for additional plant operator skills and if required they will inform Ward and request early mobilisation. To reduce risk of fire spread and based on their DRA confirming is safe to do so, the fire team will commence appropriate firefighting.

Out of Hours Rapid Response Plan - The responsible Ward Employee will attend site and contact mobile plant operatives, including Site Supervisors from the local area in order that a trained team of operatives attend site to segregate non burning material and assist the Fire and Rescue Service. The responsible person will have contact numbers for all operatives employed at the site.

### **Active firefighting measures**

Ward recognises that active firefighting doesn't mean that staff must put themselves at risk by trying to fight a fire. Active firefighting means having the following resources available to fight a fire and aid the Fire and Rescue Service (FRS).

- The use of water (via hoses or the purpose designed suppression system).
- Covering the burning material with a textile, to suffocate a fire and limit oxygen supply. Use of StatX grenades is under investigation for plant.
- Breaking apart the burning pile to allow water to penetrate
- Removing un-burnt material close to the fire
- Moving the burnt material to reduce the fuel available and allow material to be quenched (in hoses or tanks of water)
- Plant to move waste around the site.
- Trained Staff
- Available water supply being improved (see section water supplies)

### **Operational Handover**

An important part of our zero-2-5-20 strategy is to ensure a consistent fire attack is maintained to aim for a fire to be extinguished within 4 hours. The engagement of professional firefighters as a waking watch and early detection/suppression capability has the added benefit that operational handover will be integrated, comprehensive, and provide the best chance of chance of extinguishing the fire quickly. The site has created a dedicated Site Incident Management Point (SIMPoint) as a focal point for operational handover and continuation of effective incident command.

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A draft joint working protocol for the site had been agreed with the Notts FRS local Waste Fire Tactical Adviser with the previous operator of the site and this will be discussed again in the near future.

## 16. WATER SUPPLIES

EA guidance recommends the site makes provision for 900,000 litres of water to be available to support a long-term fire attack, and the following section explains how this provision (900,000 litres) would be achieved at Nottingham.

The purpose of our major investment in the zero2five20 strategy is to ensure fires are prevented from occurring where possible, dealt with effectively and quickly in minutes, without the need for summoning the Fire and Rescue Services. This meets the primary aim of the FPP guidance which is to minimise the likelihood of a fire happening.

### Reasonable worst-case scenario

The plan acknowledges the importance of having sufficient water available for firefighting to take place to meet the FPP aims, and to manage a reasonable worst-case scenario. The previous operator had undertaken a task assessment for water requirements, in partnership with the Nottinghamshire Fire and Rescue Service (NFRS). This analysis has considered a range of variables such as how advanced a fire might be before being discovered, immediately available water supplies, how quickly an effective intervention can be commenced, what fire appliances and firefighting skills are available at any given time etc. The emphasis is on preventing events, early detection, immediate response in terms of water but also resource to separate/minimise spread.

FPP guidance suggests one method of calculating adequate water supply requirement is to base an assessment on the largest waste pile catching fire. Based on this approach the water supply requirement would be as follows:

Maximum pile volume in cubic metres	Water supply needed in litres per minute	Overall water supply needed over 3 hours in litres	Total water available on site in litres
Enter volume, for example, 300 m3	Pile volume x 6.67	Water supply per minute x 180	
750	5,002	900,000	500,000

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The water calculation below, demonstrates that we have 500,000 litres available on site.

Location	Volume
Western boundary by ELV building and quarantine area	7,500
Shredder infeed conveyor	100,000
Shredder	12,500
Frag waste / by hot cutting area	50,000
Northern boundary by SMW pre-treatment	10,000
Downstream / shredder waste area	30,000
3 x 30,000 litre tanks to support the automated system.	90,000
3 x additional 30,000 litre water tanks	90,000
Quenching tank'	5,000
5* IBC water	5,000
Supplementary back up water in firewater storage tank	100,000
<b>Total</b>	<b>500,000</b>

Easy access to an immediately available water supply will give our onsite fire teams and the FRS the best chance of extinguishing a fire and meeting the objectives of zero-2-5-20. The site has recently had its water supplies upgraded through the installation of strategically located water tanks. This water is stored in tanks, and all are fitted with suitable couplings to enable connection by local FRS crews (tanks on site as shown on the plan provided). This will enable FRS to use on site water sources to respond rapidly and it will enable the tanks to be refilled if the automated detection and suppression system is effectively controlling the fire but running low on water.

The installation onsite of a fixed fire system that consists of fire detecting cameras which can initiate and control a water-based and accurate fire attack using water deluges and oscillating water monitors increases the likelihood of a fire being brought under control/extinguished more quickly.

#### Other equipment

- Fully operational front line fire appliance - fire truck 5 hose reels
- 3 lay flat hose
- 3 portable monitors - for providing immediate response / cooling water to stockpiles - located strategically /ready for use outside of operational hours.
- Approx. 100 fire extinguishers

After extensive liaison with NFRS by the previous operator, our plan is based on ensuring all fires are dealt with and contained by the extensive onsite capability to detect and safely deal with a fire before the need to involve NFRS. In the unlikely event that NFRS attend, we will resurrect the joint protocol (JP) agreement with a jointly agreed planning assumption. This protocol commits both parties to agreeing a water supply strategy for water requirements more than 500,000 litres, as part of tactical planning. Within the protocol NFRS acknowledged the significant investment and improvement in water availability for firefighting, and also recognises the benefits of the following alternative measures at the site:

- Procurement of onsite fire appliances to enable rapid and effective early intervention.
- Procurement of thermal imaging technology to ensure 24/7 thermal monitoring.

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- Improved site layout, fire separation, fire breaks and site management to minimise risk of fire spread.
- Implementation of improved water supplies (storage tanks) to ensure a sustained and concentrated attack can be implemented. Couplings suitable for connection by FRS equipment. Hose reels are fitted and are automatically pump fed by the site giving an excellent first attack knockdown.
- Automated attack systems that can be accurately applied.
- Procurement of professional firefighting capability to ensure all potential fires are identified and dealt with at a very early stage.
- Waterless firefighting capability (blankets) for ELVs, confined spaces, and as part of firefighting tactics when breaking up piles involved in fire.
- Procurement of automated systems for mobile plant.
- Improved handover through SIMPoint concept.

This level of fire prevention and intervention resource dramatically reduces the risk of a serious fire taking hold. Nevertheless, planning assumptions within the JP, in terms of water supplies, have been based on meeting the FPP guidelines, with an agreed 3-level approach in place.

Level 1(hour1) - **Initial attack** – the water supply for the first hour attack comprises the site supplies, supplemented by local hydrants. Total FPP requirement for hour 1 comprises 285,000 litres from site water supplies and 15,000 litres from hydrants. **Total supply 300,000 litres.**

The Fire hydrants are the property of Severn Trent Water and are all 150mm diameter water supply hydrant. Using STW Flow rate estimator tool, a 50mm diameter water supply connection would be required to meet 50 l/s supply. The 150mm diameter fire hydrants will provide 180,000 litres per hour and will be more than sufficient. The location of the nearest fire hydrant is on Acorn Park, off Harrimans Lane approx. 40 m from site entrance and the direction of this is indicated on the plan shown in appendix 3. There is a hydrant on the corner of Redfield Rd approx. 75m from the site entrance and a further hydrant on Redfield Rd near The Midway approx. 135m from site entrance.

Level 2 (hour 2)- **Sustained attack (unlikely)**– the NFRS Water Plan for the area requires an interim water relay to be put in place within the first hour of the call. The water relay comprises 2 light portable pumps (LPP), and an agreed relayed water supply for planning assumptions is 120,000 litres of water, which will be supplemented by using 180,000litres of water from on-site supplies. **Total supply 300,000 litres.**

In addition, Fire hydrants (180,000 litres per hr) would be available as back-up to water relay during level 2.

Level 3 (hour 3 plus)- **Long term attack (highly unlikely)**– The NFRS Water Plan for the Nottingham site includes the use of High-Volume Pumps (HVPs) for provision of water supplies. The HVP system is capable of delivering 45,000l per minute at maximum capacity. The requirement for our plan is 5,000 litres per minute. It is anticipated that an HVP system will be in place within two hours of receiving the 999 calls from the site. Both parties agree that this is a reasonable planning assumption but acknowledge the dynamic nature of fire service operations. **Total supply 300,000 litres.**

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In addition, there would be 35,000 litres remaining of site supplies and the LPP (120,000 litres per hr) fire hydrants (180,000 litres per hr) would be available as a back-up during level 3.

This 3-level plan is a collaborative and managed way to achieve the volume suggested by FPP guidance.

The JP also anticipates that in some circumstances the local NFRS could reasonably foresee the need to cease or limit firefighting operations because the consequences of continuing (whether they be environmental or some other) would be worse than the destruction of property. This protocol commits both parties to actively consider all potential firefighting tactics as part of pre-planning.

The total water supplies available include an allowance for dealing with the maximum quantity of ELVs stored on site. Site procedures will manage the total number of undepolluted ELVs on site to a typical level of 50 ELVs (50 ELV's \* 1,800 litres per ELV specified in EA guidance = 90,000 litres of water). Including depolluted ELV's, there will be no more than 275 ELV's in total on site (275 ELV \* 1,800 litres = 495,000 litres.) There is 500,000 litres of water available on site. Our risk analysis does not support the foreseeability of all ELVs becoming involved in fire simultaneously with an out-of-control waste pile fire. In addition, we are implementing a range of waterless firefighting innovations for ELV fires (see previous section)

### **Safe access and egress**

Safe access and egress to the site for fire and rescue services and other emergency responders is achieved from the Harrimans Lane via main entrance / exit as shown on plan in Appendix 2. The FRS had confirmed they are satisfied with the site accessibility. They have confirmed the access is adequate to fight fire from within the site premises and that there is no need to access the whole perimeter of the site or access neighbouring sites in the event of a fire.

Internal roadways are maintained to enable fire access at a minimum of 4m width. There are no weight or height restrictions on site transport routes or on the immediate access roads in the vicinity of the site that would restrict access for Fire Rescue Service FRS appliances. Access has minimum of 3.7m width and 3.7 - 4m height clearance and min weight restrictions >24 tonnes.

## **17. MANAGING FIREWATER & MINIMISING EMISSIONS TO WATER, LAND & AIR**

All combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on the community, critical infrastructure and the environment) are minimised by the methods detailed below.

### **17.1 Firewater & Minimising Emissions to Land / Water – reducing risk**

One of the primary aims of the zero2five20 approach is to minimise the use of water through achieving early detection and intervention, and hence minimise the amount of water required and therefore firewater potentially generated.

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EA guidance recommends a containment provision broadly equivalent to the water supply requirements discussed in section 16 (900,000 litres). Of course, the application of water to the fire will result in an evaporation loss estimated at a minimum of 5% of water used 45000 litres. The following section explains how containment will be achieved through.

- Primary containment. 88,000 litres
- Secondary containment. 220,000 litres
- Tertiary containment. 600,000 litres
- **Total containment. 908,000 litres**

### Managing Fire Water

The operational site surface is impermeable pavement with sealed drainage system as shown on the plan and this minimises the risk of pollution from firewater into the ground. Combustible wastes are stored on the part of the site that drains to Foul Sewer. Firewater will be contained on site within the drainage system / interceptor or on the site surface, using pollution prevention measures such as bags/bungs to prevent discharge to sewer, whilst expert advice is sought regarding discharge or disposal. Locations of bungs and manhole cover keys are shown on plan at appendix 2.

**Primary containment.** The site foul interceptor which has a capacity of approx. 20,000 litres, approx. 26000 litres will be stored within drainage infrastructure, surface water drainage infrastructure stores approx. 16,000 litres, and approx. 26,000 litres will be stored within the pipework. **Capacity 88,000 litres (approx.)**

**Secondary containment.** In addition to this storage, a secondary storage area has been created in a car park and fire water booms are being procured to direct water to the area (using the natural fall of the site). This area can contain 120,000 litres (approx.) A secondary water tank storage is in the process of being procured/installed (subject to relevant approvals) with a capacity of 100,000 litres. **The total planned volume of secondary containment is 220,000 litres (approx.).**

**Tertiary containment.** In addition, the business is procuring a number of emergency water bladders which have a capacity of **600,000** litres, that will be located at Nottingham, but are also a regional resource for the business. If deployed, siting and location of the bladders will be under the direction of, and in collaboration with the NFRS.

### **Total capacity 908,000 litres**

In the event of a major fire, water will be pumped into the bladders (which will be fitted with FRS compatible couplings), and accumulated water stored on site / in the drainage system, that requires disposal., will be removed from site by tanker to suitably authorised facility or discharged to sewer with the permission of Severn Trent Water. Tankers will be mobilised to remove firewater and / or if possible, an agreement with STW to discharge to sewer.

If firefighting water has entered, or has the potential to enter, the Severn Trent Water sewerage system during an incident, Severn Trent Water will be contacted on **0800 783 4444** stating the site name and

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location, the potential composition, volume, and discharge rate of firefighting water to the foul sewer. Severn Trent Water's contact number will also be included in the Emergency Contingency and Accident Management Plan.

It will be vital that the measures implemented to deal with firewater run-off do not inadvertently hinder the firefighting process or trap or delay the fire-fighting personnel or any employees assisting the FRS.

There are no nearby surface water courses e.g., rivers, streams, estuaries etc.

## 17.2 Minimising Emissions to Air

The aims of emergency response plans include minimising the combustion products and emissions to air and hence minimising potential for impact on the community, critical infrastructure, and the environment. However, one of the tactics that may be considered by NFRS at a major fire is controlled burning, and this is outside the control of the business.

The Joint Protocol with NFRS acknowledges that there may be a need for controlled burning as a defensive operational tactic to prohibit or restrict the use of extinguishing media on fires to allow the combustion process to continue uninhibited. A controlled burning strategy may warrant consideration in certain circumstances, including protecting the environment, where the benefit from offensive firefighting does not outweigh the risks, or where available resources and media are insufficient to successfully resolve the incident.

The JP notes that, in the case of the Nottingham site, and the relatively low level of population density around the site, controlled burning will be considered as a low-risk operational tactic.

## 18.0 DURING & AFTER AN INCIDENT

### 18.1 DURING

#### Contingency during a fire

A contingency is in place to divert incoming wastes during a fire. Site management will contact senior management/ commercial teams and central planning to redirect incoming loads to other internal or external facilities as necessary. Ward has a large network of other facilities that could also receive wastes in the event of an emergency.

#### Sensitive receptors

Sensitive receptors are shown on the plans in appendix 1.

Sensitive Human receptors on plan in appendix 1a and sensitive ecological receptors on the plan in appendix 1b.

There are no sensitive receptors immediately neighbouring the boundary of the site.

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There are some residential areas within 250m of the site and the advice of the FRS will be sought in respect of communicating with the public in the event of an incident. There are no sensitive receptors (schools, hospitals, care/nursing homes) within 250m down-wind of the site.

The receptors listed below are located >500m downwind of the site and so should not be affected in the event of a fire. However, dependant on meteorological conditions at the time of an incident could potentially be affected, their details are available in this plan to enable them to be informed in the event of a significant fire. The FRS will be consulted to provide advice on the message relayed to the receptors.

Receptor	Distance	Contact details
Dunkirk Primary School, Marlborough St, Dunkirk, Nottingham NG7 2LE	505m	0115 9153273

## 18.2 AFTER A FIRE

Fire debris will continue to be turned using the onsite plant and dowsed as necessary, under the guidance of Fire and Rescue personnel or onsite competent staff. Debris will be turned and dowsed until site management, in collaboration with the FRS, confirm that the risk of fire has been adequately reduced. In some cases, such as larger lithium batteries, the risk of re-ignition is present, and the FRS may need specialist advice.

Thermal imaging technology will be used to support this risk assessment.

Metallic waste including fire damaged SMW will be treated in the shredder.

Any non-metallic residues will be kept separate and an assessment made to determine suitable recovery / disposal routes.

If debris appears to contain combustible wastes, stockpiles will be maintained at levels in accordance with EA guidance i.e. 20m\*20m\*4m and 6 metre separation from other combustible wastes and monitored in accordance with FPP. The hot load temporary quarantine area, which is capable of holding 50% of largest stockpile, will be used to store wastes involved in the fire.

It may remain necessary to continue to divert inbound material to alternative sites whilst the immediate after fire inspections and any necessary repairs are effected. This will take place as per contingency plans in place.

Fire water will be disposed of to a foul sewer with the permission of Severn Trent or taken for specialised treatment at suitably authorised facilities.

The infrastructure and drainage will be inspected. As detailed above, it may be necessary to empty the interceptor and clear the drainage system of any accumulated firewater or debris. The concrete surface will be inspected for signs of fire damage that could affect the integrity and repairs undertaken if the integrity has been compromised and before the area is returned to active waste storage/ treatment.

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Key infrastructure such as plant / electrics / telecommunications / CCTV etc. will be checked to ensure they are functioning and repaired as necessary.

A full investigation will take place including root cause, corrective actions to prevent reoccurrence, effectiveness of response. Stockpile Management and Fire Prevention Protocol and Emergency Contingency and Accident Management Plans will be reviewed and updated accordingly where required.

Any fire-fighting resources or pollution prevention equipment that has been consumed will be replaced without delay.

A learning debrief (Tool Box Talk) will take place to capture lessons for future improvement round process, procedures or capabilities. This debrief outcomes will be shared with the local FRS, and other relevant partners.

### **19.0 MONITORING COMPLIANCE WITH THE PLAN**

The FPP is communicated to employees by means of a TBT and compliance with the plan is monitored visually on a daily basis during routine inspections. Safety Conversations are used to monitor employees understanding of the requirements.

Regular exercises on site to test the effectiveness of fire response are tested twice per year (as detailed in Emergency Contingency Plan) by drills.

- Q1. Are permits to work available for all contractors on site?
- Q2. Are the tonnage restrictions being followed?
- Q3. Are adequate roadways and firebreaks being maintained?
- Q4. Is the fire-fighting equipment available?
- Q5. Is there a designated quarantine area available?
- Q6. Are sources of ignition being controlled?

As detailed previously in plant and equipment section, plant and equipment are adequately serviced and maintained by appropriately trained or where required qualified personnel. Daily checks are undertaken and records kept.

Monthly stock checks will monitor and record residence times of wastes on site.

Regular exercises on site to test the effectiveness of fire response are tested twice per year.

### **OTHER STOCKPILE MANAGEMENT SAFETY CONSIDERATIONS**

#### **Reducing Falling Objects & preventing slips, trips and falls**

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Care is taken to ensure that scrap is stacked in a safe manner and there are no signs of stockpiles being unstable. Vehicles will not tip directly onto scrap stockpiles

Flattened/baled cars or other baled waste are picked and placed at the base of stockpiles. Bales will not be used as support or separation walls.

Vehicles will not tip directly onto stockpiles. Lorry Drivers are instructed to tip a minimum of one car length away from the edge of stockpiles.

Oversized O/S material is inspected regularly to ensure items do not overhang or are unstable. If stability cannot be ensured, then physical means such as barriers are used as a temporary measure to provide a safe distance for pedestrians.

Only pedestrians authorised by the weighbridge to tip/ unload are allowed access to the stockpile areas. Pedestrians (inspectors and customers) must keep a minimum distance of at least an average car length away from the edge of the stockpile.

All pedestrians/ customers are controlled and as required escorted by site staff at all times while on site. Trained operatives will ensure tipping, loading and maintenance activities where customers/contractors are involved do comply with the relevant safe procedures as per company standard/risk assessments and Safe Working Procedures in place.

Pedestrians will keep to designated walkways where available and good housekeeping is maintained to minimise the risk of slips, trips and falls.

To allow site management to comply with controls and prove reasonable monitoring is taking place, the following key questions are asked regularly:

Q7. Are bales/ flattened cars stored at the base of piles?

Q8. Are there any obvious overhangs or stability issues?

Q9. Are all visitors accompanied on site?

Q10. Are employees using designated walkways?

Q11. Are lorry drivers tipping a minimum of a car length away from stockpile edges?

Q12. Are the edges of stockpiles routinely pushed up to minimise trips and slips.

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