

From: [Victoria Jones](#)
To: [Francis Nwafor](#); [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [Greg Deakin](#); [Donald Ward](#); [Georgina Sidney](#)
Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application CRM:0229111
Date: 23 July 2026 16:23:46
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[Donald Ward Limited_Barnsley_Ecology Assessment Report_23.07.26.pdf](#)
[Donald Ward Limited_Barnsley_Appendix 2_Site Layout Plan_July 2026_V3.pdf](#)
[Donald Ward Limited_Barnsley_Operating Techniques_July 2026.pdf](#)

Dear Francis

Please find attached the Ecology Assessment Report as required in respect of Point 7.

Following your call earlier I also attach the following updated documents:

- Updated Site Layout Plan to highlight 'buildings' and 'kerbing'
- Updated Operating Techniques to 1) remove the reference to storing of scrap on hardstanding and 2) update further in respect of Point 4 below the site containment – Section 2.9 of this document has been updated to cover this.

Enjoy your annual leave and I look forward to hearing from you regarding next steps and timescales in the permitting process.

Kind Regards,

Victoria Jones
Head of Environment and Sustainability

t: +44 (0) 345 337 0000 | m: [07342948328](tel:07342948328) | e: vjones@ward.com | w: ward.com



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From: Victoria Jones

Sent: 23 July 2026 11:15

To: 'Francis Nwafor' <francis.nwafor@environment-agency.gov.uk>; 'SM-Defra-RESP-notifications (DEFRA)' <RESP-notifications@defra.gov.uk>

Cc: Greg Deakin <greg.deakin@environment-agency.gov.uk>; Donald Ward <donald@ward.com>; Georgina Sidney <gsidney@ward.com>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application
CRM:0229111

Dear Francis

In respect of Point 6 – please find attached a Flood Risk Assessment.

Kind Regards,

Victoria Jones

Head of Environment and Sustainability

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From: Victoria Jones

Sent: 22 July 2026 11:49

To: Francis Nwafor <francis.nwafor@environment-agency.gov.uk>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application
CRM:0229111

Dear Francis

Please see an updated Operating Techniques for Barnsley. I noted some typos and so have updated. Please use this version.

Many thanks and

Kind Regards,

Victoria Jones
Head of Environment and Sustainability

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From: Victoria Jones

Sent: 21 July 2026 12:29

To: 'Francis Nwafor' <francis.nwafor@environment-agency.gov.uk>; 'SM-Defra-RESP-notifications (DEFRA)' <RESP-notifications@defra.gov.uk>

Cc: 'Greg Deakin' <greg.deakin@environment-agency.gov.uk>; 'Paivi Porali-Perrell' <paivi.porali@environment-agency.gov.uk>; 'Paul Fernee' <paul.fernee@environment-agency.gov.uk>; Donald Ward <donald@ward.com>; Georgina Sidney <gsidney@ward.com>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application CRM:0229111

Dear Francis

Please see updated responses in the initial email trail below to Qs 8 & 9 – now in green font.

Work continues on the outstanding Flood Risk Assessment and Ecological Assessment [Q6 & 7], to provide a robust and professional report and response by 23 July 2026. I do however wish to further request some degree of leniency should this be needed, however we are working hard to meet the deadline!

Kind Regards,

Victoria Jones
Head of Environment and Sustainability

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From: Victoria Jones

Sent: 16 July 2026 08:57

To: 'Francis Nwafor' <francis.nwafor@environment-agency.gov.uk>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Cc: Greg Deakin <greg.deakin@environment-agency.gov.uk>; Paivi Porali-Perrell <paivi.porali@environment-agency.gov.uk>; Paul Fernee <paul.fernee@environment-agency.gov.uk>; Donald Ward <donald@ward.com>; Georgina Sidney <gsidney@ward.com>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application CRM:0229111

Good Morning Francis

I do not recall being offered the option to withdraw the application, however I am not sure exactly at this stage what that would achieve.

That aside, whilst it is appreciated that there is a process for permitting to follow, on the Nottingham Permit Application we were given an extension to provide some outstanding information and the permit application was not withdrawn. We met these timescales and kept the EA informed and updated and appreciated the support.

Ward is working hard to enable full permitted operations to recommence at the former Unimetals site at Barnsley and would welcome the further support of the Environment Agency. The additional payment has been made for ELV activity and a Habitat's assessment yesterday [15 July 2026] and some additional information already provided. The Flood RA and Ecological assessment required review and proposals for work to be put forward by consultants and this has been provided and agreed with real momentum, and they have commenced this work, working hard to meet the 23 July 2026 deadline. We are therefore working to fulfil this tight deadline, and we may meet it, however the request was for some degree of leniency and support should this slip slightly and that I will keep you updated on this work and progress towards the deadline.

I therefore politely request that this be reconsidered, and we can continue to work and progress on re-permitting the Barnsley facility.

Kind Regards,

Victoria Jones
Head of Environment and Sustainability

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From: Francis Nwafor <francis.nwafor@environment-agency.gov.uk>

Sent: 16 July 2026 08:22

To: Victoria Jones <vjones@ward.com>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application
CRM:0229111

Hi Victoria,

Thank you for the additional information. We will review it over the next few days.

Regarding your request for an extension to the response deadline, we can confirm that the deadline will not be extended. You must provide all requested information, documents, and the fee by the deadline. If any of these are not received, the application will be returned as incomplete.

We previously offered you the option to withdraw the application and resubmit it at a later date when you had all the required information. However, you chose to provide the requested information within the 10-day deadline.

We expect to receive the outstanding information and payment by 23/07/2026.

Regards.

Francis Nwafor PhD, LCIWM
Principal Permitting Officer, Installations
Permitting

Growth, Permitting and Monitoring

Email | francis.nwafor@environment-agency.gov.uk

Tel. | 02030253237; Mobile | 07585883609

Member of Race & Ethnicity Network



From: Victoria Jones <vjones@ward.com>

Sent: 15 July 2026 14:30

To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Cc: Francis Nwafor <francis.nwafor@environment-agency.gov.uk>

Subject: RE: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application
CRM:0229111

Francis

Please see responses in the initial email in blue font and the associated attachments as referenced. Whilst not all information is ready to provide, I wanted to provide those that are available along with an update on progress with others, that may require further discussion with regards to deadline, however work has commenced.

Kind Regards,

Victoria Jones

Head of Environment and Sustainability

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From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: 09 July 2026 08:54
To: Victoria Jones <vjones@ward.com>
Cc: Francis Nwafor <francis.nwafor@environment-agency.gov.uk>
Subject: [EXT]EPR/YP3826MQ/A001 We Need More Information About Your Application
CRM:0229111

Dear Victoria Jones

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/YP3826MQ/A001

Operator: Donald Ward Limited

Facility: Barnsley, Boulder Bridge Lane, Off Shaw Lane, Barnsley, S71 3HJ

Thank you for your application received on 11/06/2026. The following is to confirm our conversation over the past few days.

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

1. Provide a Site Layout Plan showing the locations of buildings, full extent of the impermeable surface and sealed drainage system, including drainage routes and containment infrastructure such as perimeter bunds.

Reason: *It is not clear that you have drainage infrastructure and impermeable surface that cover that full extent of the site.*

Ward Response: Please see attached updated site layout plan [Donald Ward Limited_Barnsley_Appendix 2_Site Layout Plan_July 2026_V2]. In addition, Section 2.9 of the Operating Techniques has been updated. [Donald Ward Limited_Barnsley_Operating Techniques_July 2026].

2. Amend Table 3a of the Part B3 Form and the relevant sections of the Non-technical Summary and Operating Techniques documents to reference the Waste Treatment BAT Conclusions and appropriate measures for Metal Shredding, Chemical Waste, Non-hazardous Waste, and WEEE that are applicable to your proposed site operations.

Reason: *You referred to Sector Guidance Note EPR5.06, which has now been superseded, but did not reference the relevant appropriate measures for the storage and treatment of Chemical Waste, Non-hazardous Waste, and WEEE applicable to your proposed activities. You made reference to Section 3.1 of the Operating Techniques in Table 3a of the Part B3 Form but there is no reference to the relevant standards in the document.*

Ward Response: Operating Techniques updated and attached [Donald Ward Limited_Barnsley_Operating Techniques_July 2026] – updated section is 1.7. The Non Technical Summary has also been updated and attached [Donald Ward Limited_Barnsley_Non Technical Summary_July 2026]. This has been reflected in the updated Part B3 Form, Table 3a, attached [EPB_Part_B3_application_form_Donald Ward Limited_Barnsley_Updated July 2026].

3. Confirm whether ELV treatment is taking place at this site and, if so, pay the applicable application fee.

Reason: *You stated in the Operating Techniques that 'if ELV depollution is to take place, the appropriate equipment and infrastructure will be purchased'. This suggests that you intend to carry out ELV treatment at the site. If this is the case, you will need to apply for the relevant activity and pay the applicable application fee.*

Ward Response: relevant activity applied in updated Operating Techniques attached [Donald Ward Limited_Barnsley_Operating Techniques_July 2026] – updated sections are 1.6 and 2.4. Application fee has been paid and attached is an updated Form F and Continuation Sheet to reflect this [Application_Form_Part_F1_Donald Ward Limited_Barnsley_updated July 2026 and Donald Ward Limited_Fixed Charges [Barnsley IED and Waste Operations Permit Application_July 2026]

4. Provide an assessment of the secondary containment systems in place at the site, including water management measures (e.g. tanks), and demonstrate that there is sufficient storage capacity to contain potentially polluting liquids without causing environmental impact.

Reason: *Although you stated that 'all fluids whose spillage could be harmful to the environment are stored in above-ground tanks or containers with appropriate secondary containment measures capable of holding at least 110% of the primary containment vessel volume or 25% of the total tankage', it is unclear whether the site has adequate storage and containment facilities to safely contain these liquids.*

Ward Response: The above ground tanks for storing potentially polluting liquids are all as per required specifications as detailed in the Operating Techniques. In the event of failure of these secondary containment systems, the site has spill response equipment to prevent these entering the drainage system and in the event of failure of these, have equipment to 'bung' the interceptor outlet to prevent release from site. In such events the drainage system and interceptor will be cleared and removed off site by tanker to a suitably authorised facility. The Operating Techniques have been updated in section 2.9 to reflect this.

5. Complete Section 7 of the Part B3 Form, even if it is not applicable to your site operations.

Reason: *This section of the form has not been completed.*

Ward Response: This has been reflected in the updated Part B3 Form, Table 3a, attached [EPB_Part_B3_application_form_Donald Ward Limited_Barnsley_Updated July 2026].

6. Provide a detailed flood risk assessment that considers the potential risk of pollution arising from the proposed site operations during a flooding event.

Reason: *The site is located within Flood Zone 2, and there is potential for site operations to be affected during a flooding event.*

Ward Response: consultants have been instructed to complete a Flood RA and have commenced work. Whilst there is a deadline to respond by 23 July 2026 and we are doing our best to meet this tight deadline to complete this work, I will provide an update with regards progress early next week latest and at this stage request that the Environment Agency consider any reasonable extension to the 23 July 2026 that may be required, in order the application may remain in this duly made determination period.

7. Pay the appropriate add-on fee of £808.60 for the habitat assessment and submit a habitat/ecological assessment report.

Reason: *The application does not include a habitat/ecological assessment, and this information*

is required to assess the potential impact of the proposed activities on protected habitats, species, and ecological receptors. Again, you did not pay the relevant habitat assessment fee.

Ward Response: consultants have been instructed to complete an assessment and have commenced work. Whilst there is a deadline to respond by 23 July 2026 and we are doing our best to meet this tight deadline to complete this work, I will provide an update with regards progress early next week latest and at this stage request that the Environment Agency consider any reasonable extension to the 23 July 2026 that may be required, in order the application may remain in this duly made determination period.

The assessment fee has been paid and attached is an updated Form F and Continuation Sheet to reflect this [Application_Form_Part_F1_Donald Ward Limited_Barnsley_updated July 2026 and Donald Ward Limited_Fixed Charges [Barnsley IED and Waste Operations Permit Application_July 2026].

8. Provide a copy of the H1 assessment tool for emissions to air and water that you used (in Excel or Access format) and the modelling input files for the emission to air assessment.

Reason: *These were not included in your application submission.*

Ward Response: this will be provided in due course.

Update 21 July 2026: Please use the following link to access the H1 tools for Barnsley. The AQ modelling input files are attached.

<https://emeamft.tetrattech.com/message/MXXzevjCoDAVd7TXcZnJM3>

9. Provide reason on how the 'low risk' decision was reached after the assessment showed that copper could not be screened out after Test 3.

Reason: *These documents/files were not included in your application submission. We want you to provide further information on why modelling was not considered necessary after it was uncovered that copper failed to screen out under Test 3.*

Ward Response: this will be provided in due course.

Update 21 July 2026:

As stated on the WFD page for the Cudworth Dyke, the primary environmental strains preventing this water body from achieving a "Good" ecological status do not typically stem from copper or other heavy metal failures. Instead, the verified Reasons for Not Achieving Good (RNAG) focus on high levels of ammonia and Biochemical Oxygen Demand (BOD) as being the primary causes of poor water quality. The 'Waste treatment and disposal' sector is not identified as being a contributor to any RNAG for the Cudworth Dyke.

The catchment is influenced by historic mining, which can contribute to moderately to highly alkaline conditions and elevated dissolved organic carbon (DOC). Increased DOC and calcium concentrations act to bind and inhibit free copper ions, reducing their bioavailability. As a result, the local total dissolved concentration of copper is likely to be much greater than the biologically available fraction. Both the bioavailable concentration in both the effluent and background for copper used in the H1 assessment have been estimated using assumptions (10% of dissolved and 10% of the EQS respectively). Copper passes all H1 Screening tests except for Test 3 at 26.8% (test limit of 10%).

The Cudworth Dyke has a “Good” chemical quality status, which was achieved while the Site was previously in operation. Similar metals recycling operations have been carried out at the site since 1981 and only ceased in November 2025. This suggests that while copper does not screen out at Test 3, its impact does not significantly affect the WFD chemical classification. However, it is concluded that copper should be kept under review as further monitoring data is collected to enable a future H1 assessment with at least 12 data points for the dissolved phase concentration of copper and other metals.

Please reply directly to this email with your information and copy in francis.nwafor@environment-agency.gov.uk.

You must send us the information and or payment by **23/07/2026**.

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

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

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

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

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

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>.

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

If you have any questions please phone me on 07585883609 or email francis.nwafor@environment-agency.gov.uk.

Yours sincerely,
Francis Nwafor

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