Client: CELLSAFEUK Limited
Address: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2PN

CELLSAFEUK Limited, Round Croft Works, Field Street, Willenhall, West Midlands, WV13 2PN

Application for Bespoke Environmental Permit

Fire Prevention Plan

12 February 2026

Our Reference: CELLSAFEUK Ltd-FPP-RP03-Final, Rev B

Waste And Industry Compliance Ltd

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CELLSAFEUK Ltd-FPP-RP03-Final, Rev B

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1 INTRODUCTION

1.1 BACKGROUND

1.1.1 This Fire Prevention Plan (FPP) has been prepared on behalf of CELLSAFEUK Limited ***(the Operator)*** for Round Croft Works, off Field Street, Willenhall, West Midlands, WV13 2PN ***(the Site)***. It is submitted in support of an application for a bespoke Environmental Permit for the Site.

1.1.2 CELLSAFEUK Limited will operate the facility to treat non-hazardous batteries, i.e. AA and AAA alkaline batteries, for the recovery of recyclable components such as black mass, ferrous metal and brass pins. The Site will not accept any other types of batteries, including Lithium, Li Ion, lead acid or other hazardous batteries. Hazardous wastes will not be accepted.

1.1.3 Up to 3,120 tonnes of non-hazardous alkaline batteries will be accepted per annum. The Site will treat up to 10 tonnes per day of wastes for recovery and is classed as a Waste Operation under Schedule 9 of the Environmental Permitting (England and Wales) Regulations 2016.

1.1.4 Although the Site will only accept batteries classed as non-hazardous, the Environment Agency stated during enhanced pre-application consultations on 19 December 2025:

"When non-hazardous batteries are treated – and in this case shredded – it changes the nature of the waste and creates hazardous waste. The content of batteries 'black mass' is hazardous due to the metals and chemistry of the materials, so where batteries are not hazardous pre-shredding we do need to consider any subsequent treatment of the shredded battery material."

1.1.5 Materials separated downstream of the shredder will not be mixed and instead stored separately from one another. Non-hazardous and hazardous wastes are not mixed at the Site.

1.1.6 The Site incorporates a series of fully enclosed and roofed steel portal framed and metal clad buildings fitted with roller shutter vehicular access doors and pedestrian access doors. The floor of all the buildings comprises impermeable concrete slab. There are no drainage outlets inside the buildings, i.e. they are fully sealed and contained. The buildings comprise:

- Goods Inwards building
- Picking Station building
- Processing building
- Good Out building.

1.1.7 Fireproof concrete bays, each with two side walls and rear push wall, will be installed in the Goods Inward building and Goods Out building to ensure that pre-processed and processed battery components are safely stored at all times. The concrete will meet the requirement of Class A1 Fire Resistance in accordance with Clause 4.3.4.4 of EN13369 and provide a minimum fire resistance period of 2 hours. 6m separation distances will be maintained in front of bays to prevent the spread of fire in the unlikely event that a fire incident occurs.

1.1.8 Alkaline batteries will be subject to detailed pre-acceptance and acceptance procedures, including visual

inspection to ensure that only acceptable and permitted loads are received and processed at the Site, see Section 3 below.

1.1.9 Incoming waste delivery vehicles will be weighed on the Site's weighbridge. Acceptable waste loads will be off-loaded from the delivery vehicles by forklift truck and transferred into the Goods Inward building for storage, prior to processing as follows:

- Transferred by forklift truck from the 'Goods Inward' building to the Picking Station building, where materials will be unloaded into a reception hopper, which feeds a conveyor and picking station. All batteries will pass along the conveyor. Site operatives will be positioned either side and will visually inspect each battery. Any contraries or inadvertently received non-permitted batteries will be manually removed and stored in a quarantine skip for removal from site to an authorised facility.

- Acceptable batteries will be discharged from the end of the conveyor and stored in palletised containers, which will be transferred by forklift truck to the Processing building.

- Inside the Processing building, batteries will be fed into a feed hopper and onto a shaker bed, where any dirt or other fine material will be 'shaken off' and captured in a sealed container located below. Clean batteries will then transfer up an inclined conveyor to a shredding plant, where they will be shredded and screened, with 'black mass' material captured in sealed 60 litre containers and for dispatch from the Site as a hazardous waste. Remaining material will transfer via conveyor to a drum magnet for ferrous metal separation into a sealed container of between 0.6m^3 and 1.2m^3 capacity, before passing to an eddy current separator for capture of brass pins and any other non-ferrous metal. Remaining residual materials such as paper, plastic etc will be stored in a sealed container.

- Separated and stored components will be transferred to the Goods Out building, where they will be stored in a series of fireproof concrete bays pending their removal from the Site to authorised off-site facilities.

1.1.10 All incoming wastes will be stored and processed inside the buildings.

1.1.11 An external yard in front and to the side and rear of the buildings and within the Site boundary comprises a combination of concrete and tarmac surfacing. The weighbridge and a weighbridge office will be installed to the immediate west of the buildings.

1.1.12 A dedicated concrete bay will be installed in the Goods Out building. It will be capable of holding 50% of the largest waste pile and used for the quarantining of wastes etc in the event of a fire incident.

1.1.13 The Site is accessed off Round Croft and is secured by a combination of steel mesh and palisade fencing. Lockable security gates are installed at the Site entrance off Round Croft. CCTV cameras are installed for added security, both inside the buildings and on the external yard to provide complete and continuous cover of the entire site.

1.1.14 A 2,000 litres double skinned diesel storage tank will be installed at the Site.

1.1.15 The proposed permit boundary, site layout and storage areas are shown on Drawing 'Indicative Site Layout and Storage'-DW01.

1.1.16 The Site is secured by a combination of 2.4 metres high steel mesh and palisade security fencing and lockable security gates at the Site entrance. CCTV cameras are installed for added security, both inside the buildings and on the external yard to provide continuous cover of the entire site, including all waste storage and processing areas.

1.1.17 The Environmental Permit application has been prepared in accordance with all relevant Environment Agency guidance, including:

- Appropriate measures for Batteries Waste batteries: appropriate measures for permitted facilities - GOV.UK
- Non-hazardous and inert waste: appropriate measures for permitted facilities - GOV.UK
- Chemical waste: appropriate measures for permitted facilities - GOV.UK
- Treating metal waste in shredders: appropriate measures for permitted facilities – Gov.UK.

1.1.18 This FPP has been prepared in accordance with the Environment Agency`s Fire Prevention Plan (FPP) Guidance, which was most recently updated on 11 January 2021, see https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits.

1.2 THE SITE

1.2.1 The Site is located on Round Croft, off Field Street, Willenhall, Walsall. It is located in a mixed industrial and residential area.

1.2.2 The Site is accessed via the public highway on Round Croft, to the immediate north of the facility, beyond which is the Keys Doctors Surgery, the Salvation Army Church and residential properties. Field Street is located to the immediate east, beyond which are industrial units. Commercial and industrial land is located to the immediate south, including Gilberts Bar and Function Room. Residential properties are to the north, off Round Croft and Pinson Road.

1.2.3 The nearest residential properties are circa 16m northwest on Round Croft, 23m southeast on Field Street, 30m west on St Stephen's Avenue, 60m north on Pinson Road and 70m east on Gomer Street.

1.2.4 There are no European Sites, i.e. Special Protection Areas (SPA), Special Conservation Areas (SAC) or Ramsar Sites within 2k of the Site.

1.2.5 There are no Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Biosphere Reserves, Marine Conservation Zones, Ancient Woodlands or Scheduled Monuments within a 2km radius of the site boundary.

1.2.6 Waddens Brook, Noose Lane, (Fibbersley) Local Nature Reserve (LNR) is circa 667m northwest of the Site. The Natural England designation https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009312 describes the LNR as *"one of the best wetland sites in Walsall and has wet grassland, wildflower meadows, marshes and ponds. It is a good site for amphibians, and has over 20 species of birds and over 200 species of plants recorded."*

1.2.7 The nearest area of Priority Habitat is circa 121m northwest of the Site, namely a large area of Woodpasture and Parkland BAP Priority Habitat and Deciduous Woodland.

1.2.8 There are areas of Priority Habitat Coastal and Floodplain Grazing Marsh circa 335m south southwest and 376m west of the Site. There are other areas of Priority Habitat northwest of the Site, including Deciduous Woodland circa 673m distant, Coastal and Floodplain Grazing Marsh circa 752m distant and Good quality semi-improved grassland circa 836m distant.

1.2.9 All of Walsall metropolitan borough area has been designed as an Air Quality Management Area (AQMA) for nitrogen dioxide (NO_2).

1.2.10 Sensitive receptors are shown on Drawing 'Sensitive Receptors', DW03.

1.3 OPERATIONAL HOURS

1.3.1 The proposed operational hours at the Site are as follows:

- Monday - Friday: 08:00am – 6.00pm
- Saturday: 08:00am - 14:00pm (maintenance only)
- Sunday: Closed

1.3.2 The Operator is planning to run a two shifts pattern of 06:00am - 14:00pm and 14:00pm - 22:00pm. Waste delivery and acceptance at the Site will be limited to the hours of 08:00am - 17:00pm.

1.4 FIRE PREVENTION OBJECTIVES – OUTLINE METHODOLOGY

1.4.1 The purpose of this FPP is to ensure that all reasonable measures are undertaken to prevent a fire.

1.4.2 The FPP provides a plan to minimise the likelihood of fire breaking out, a means of extinguishing fire if it breaks out and a statement of methods designed to minimise the spread of fire.

1.4.3 The Site Manager will have overall responsibility for ensuring that the potential for fire outbreak arising from operations on the Site is minimised. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.

1.4.4 In line with current industry best practice, the fire prevention controls set out in the sections below will be used as the 'appropriate measures' to minimise the risk of and, wherever possible, prevent outbreak of fire associated with operations at the Site.

1.4.5 Site meetings will be held on a monthly basis for the Site Manager, other company Directors and Technically Competent Person to discuss current and planned site operations with respect to their potential for generating fire. Identified actions arising from the meetings and responsibilities for their completion will be recorded prior to their circulation to the relevant personnel.

1.4.6 The FPP will be made readily available and clearly identified on site and all staff will be made aware of the location of the plan. It is referenced in the Environmental Management System and there will be a requirement that all contractors working on site will be briefed on the contents of the FPP.

1.5 FIRE PREVENTION PLAN REVIEW

1.5.1 The Fire Prevention Plan will be subject to annual review and additionally in the event of the following:

- A fire incident;
- A near miss incident that could have resulted in a fire;
- An update to Guidance - Fire prevention plans: environmental permits, e.g. if this FPP no longer meets the requirements;
- An application to vary the permit;
- If the wider environmental conditions change (e.g. if a school or hospital is built within 1km.

1.6 FIRE PREVENTION AND MITIGATION TRAINING

1.6.1 Staff will be trained in the contents and requirements of this FPP and the fire prevention and mitigation measures in place. All existing and new staff members will receive FPP training and refresher talks will be held annually.

1.6.2 Staff training will include:

- Use of first in, first out principles and the emptying and sweeping of waste storage and processing areas to prevent the accumulation of residual materials;
- Safe management of any non-conforming waste, including any inadvertently received hot loads;
- Maintenance and use of quarantine bay in the event of a fire or inadvertent receipt of a hot load;
- Maintenance and compliance with 1m headroom to the top of waste storage bays and painted 1m freeboard compliance line (a line will be clearly painted on the inside of each bay, 1m below the top of the bay walls, to denote the maximum height of waste storage);
- Staff to be trained in the use of fire extinguishers;
- Selected staff members to be trained as Fire Marshals;
- Selected staff members to be trained to carry out Fire Watch inspections;
- Full Fire Evacuation Drill to be held and recorded in Fire Log;
- Fire Responses to be tested by use of full fire evacuation practice.

1.6.3 Regular fire drills will be carried out initially every six months. Frequency will change depending on results of exercises, any incidents and turnover of staff. As a minimum, fire drills will be undertaken annually. Fire drills will include the sounding of an audible alarm, followed by evacuation of the site to a roster point on the chevroned area located next to the main access gate. Evacuation and a head count of staff will be undertaken by the Fire Marshal. Where it is safe to do so, trained site staff may remain on site to tackle the fire, where discussed and agreed with the Fire Marshal.

2 TYPES OF COMBUSTIBLE MATERIAL

2.1 COMBUSTIBLE WASTE

2.1.1 The list of proposed wastes at the Site and their associated fire potential or combustibility under 'normal' operational conditions is detailed in Table 1 below.

Table 1: Permitted Wastes

Waste Code	Description	Fire Risk Without Mitigation
16	**Wastes not otherwise specified in the list**	
16 06	**Batteries and accumulators**	
16 06 04	alkaline batteries (except 16 06 03)	Low
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	Medium

2.1.2 Storage arrangements for the wastes listed in Table 1 are detailed in Section 7 'Managing Waste Piles'.

2.2 PERSISTENT ORGANIC POLLUTANTS

2.2.1 AA and AAA alkaline batteries do not contain Persistent Organic Pollutants (POPs). POPs are associated with certain plastics used in lead-acid batteries, e.g. those made from acrylonitrile butadiene styrene (ABS), but not with the components or materials in typical dry alkaline batteries.

2.2.2 As the Site will not be permitted to accept lead acid or other hazardous batteries, the likelihood of POPS waste is considered low. However, in the event that POPS waste is inadvertently accepted at the Site, it will be segregated and stored in a sealed quarantine skip for urgent removal off site to an authorised disposal facility.

2.3 OTHER COMBUSTIBLE MATERIALS

2.3.1 Combustible non-waste materials used on site comprise diesel for the Company's mobile plant, engine oil, hydraulic oil, brake fluid and antifreeze etc for maintenance works, andoffice consumables such as paper and cardboard etc.

2.3.2 Diesel will be stored in a dedicated and purpose designed double skinned 2,000 litres fuel tank, the location of which is shown on Drawing 'Indicative Site Layout and Storage' DW01. The maximum volume of hydraulic oil, engine oil, brake fluid and anti-freeze that will be stored on site is 205 litres each. These liquids will be stored in dedicated drums or containers inside the buildings.

2.3.3 Fire extinguishers are located at various locations at the Site, including in the buildings and site offices, see Drawing 'Indicative Site Layout andStorage' DW01.

3 WASTE ACCEPTANCE

3.1 WASTE PRE-ACCEPTANCE PROCEDURES

3.1.1 Waste pre-acceptance procedures will ensure that only compliant waste types are accepted. Customers delivering waste to the Site will be required to provide the Operator, in advance, with all necessary information/documentation to satisfy the requirements of the Duty of Care and the Waste (England and Wales) Regulations 2011 (see below).

3.1.2 The Operator will check pre-acceptance documentation from suppliers to ensure that only permitted waste streams are approved for delivery to the Site. Non-permitted wastes or other unsuitable wastes will not be accepted. Pre-acceptance documentation will record:

- The waste description;
- The European Waste Classification (EWC) code;
- The source and nature of the waste, including its physical form, i.e. solid;
- Any special handling measures;
- Any potential risks to process safety, occupational safety and the environment;
- Details of the waste producer (name, address and contact details);
- Where the waste holder is not the producer, details of the waste holder (name, address and contact details);
- Information on the nature and variability of the waste production process and the waste;
- Age of the waste;
- An estimate of the quantity to be received in each load and in a year.

3.1.3 Checks will also be made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration will be permitted to use the Site.

3.2 WASTE ACCEPTANCE PROCEDURES

3.2.1 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

3.2.2 Site staff will be suitably trained and will follow documented procedures. The Operator will examine the waste descriptions of incoming waste loads and the information will be checked against the previously supplied pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or season ticket (as appropriate) and against the waste types permitted by the Environmental Permit.

3.2.3 Every delivery of waste will be recorded, detailing the date of the transaction, weight, waste type,

registered carrier, Waste Transfer Note number, vehicle registration and other pertinent information against a unique reference number. It will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

3.2.4 Incoming waste loads will be received in containers on pallets or in Dolav bins with integral design for lifting by forklift truck. Waste loads will be unloaded by forklift and delivered into the Goods Inward building for storage in dedicated fireproof concrete bays. This will help to ensure the cleanliness of batteries is maintained and that wastes are processed on a first in first out basis.

3.2.5 A visual inspection of the waste loads will be made during unloading to ensure that only permitted batteries are received.

3.2.6 Any discrepancies found as a result of the checks detailed above will result in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:

- Referral to a Technically Competent Person (TCP) on site;
- Referral to the waste producer to confirm the nature of the waste load;
- Referral to the waste carrier's base;
- Referral to the Environment Agency;
- Redirection of delivery vehicle off site, to a suitably authorised facility; and
- If the waste container has been offloaded and deposited in the Goods Inward building and the delivery vehicle has left the Site, non-permitted or unsuitable batteries will be transferred to a secure quarantine container for temporary storage, prior to off-site removal either to the waste producer or suitably authorised facility. All quarantined wastes will be stored in a sealed and lidded container.

3.3 NON-CONFORMING WASTE

3.3.1 Any loads arriving at the Site which contain non-permitted wastes or a significant amount of contrary material shall be rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted batteries or a large amount of contrary material, it will be re-loaded where possible. Where the vehicle has already left the Site, the non-permitted waste or contrary material will be stored in a lidded quarantine container at the Site, pending removal of the material to the waste producer or authorised facility. Any waste materials dispatched off site to an authorised facility, will be removed in accordance with the Duty of Care. A Registered Waste Carrier will be used.

3.3.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for the Environment Agency to inspect. In addition, the 'Record of Non-Conformance', Appendix 1, shall be completed and the record will be held on Site.

3.4 WASTE SAMPLING AND TESTING

3.4.1 Black mass and other separated materials will be subject to waste sampling and laboratory analysis. Samples will be sent to an independent laboratory for chemical analysis of pH, potassium, sodium, ammonium, zinc,

manganese, arsenic, cadmium, chromium, copper, mercury, lead, mercury, nickel.

3.4.2 Laboratory results will be assessed in accordance with Guidance on the classification and assessment of waste (1st Edition v1.2.GB): Technical Guidance WM3 to determine whether materials are non-hazardous or hazardous. At this stage it is anticipated that only the separated black mass may be hazardous, due to the purity of the separated brass, non-ferrous and ferrous metals. WM3 Assessment will be undertaken on a quarterly basis.

3.4.3 Any hazardous wastes will be removed from the Site to a suitably authorised facility in accordance with the Hazardous Waste (England and Wales) Regulations 2005. A Hazardous Waste Consignment Note will be used for each movement. Hazardous and non-hazardous wastes will be kept separate at all times and not mixed.

4 USING THIS FIRE PREVENTION PLAN

4.1 LOCATION OF THE FIRE PREVENTION PLAN

4.1.1 A copy of the FPP will be kept in the Site office. All staff will be made aware of its location and contents. Any contractors working at the Site, Environment Agency officers carrying out site inspections and any emergency services personnel attending the facility will also be made aware of its location and contents. Staff will be able to access the FPP at any time.

5 FIRE PREVENTION PLAN CONTENTS

5.1 ACTIVITIES AT THE SITE

5.1.1 Permitted and suitable batteries will be stored in dedicated containers inside the Goods Inwards building. The building will incorporate 4 x fireproof bays, made of concrete 'lego' blocks. The specification of each block will meet the requirements of Class A1 Fire Resistance in accordance with Clause 4.3.4.4 of EN13369 and provide a minimum fire resistance of 2 hours. Each bay will comprise a rear push wall and two side walls. Bay dimensions will each be 4.8m long, 3.2m deep and 4m high. This will enable palletised containers to be stored to a maximum height of 3m, thereby providing a 1m high freeboard from the top of the waste to the top of the bay wall. The use of 4 bays means that stock can be processed on a first in, first out basis by emptying bays in sequence, i.e. the bay containing the longest deposited waste will be emptied and the batteries processed first, before the bay with the next longest deposited waste is emptied and processed etc.

5.1.2 Batteries will be transferred by forklift truck from the 'Goods Inward' building to the Picking Station building, where materials will be unloaded into a reception hopper, which feeds a conveyor and picking station. All batteries will pass along the conveyor.

5.1.3 Site operatives will be positioned either side of the conveyor and will visually inspect each battery. Any contraries or inadvertently received non-permitted batteries will be manually removed and stored in a quarantine skip for removal from site to an authorised facility.

5.1.4 In the event that any inadvertently delivered lithium or lithium-ion batteries are detected, they will be removed and placed in a Category 1, P911 sealed and lidded container, as specified by the ADR (European Agreement concerning the International Carriage of Dangerous Goods by Road) and packing instruction P911. A Category 1, P911 container is a specialised packaging solution for the safe transport

of damaged, defective, or unstable lithium-ion batteries. These containers are designed to contain potential hazards like thermal runaway, explosions, or gas emissions that could arise during storage or transport. They are typically UN-approved and certified for Packing Group I, indicating a high level of containment.

5.1.5 Acceptable batteries will be discharged from the end of the conveyor and stored in palletised containers, which will be transferred by forklift truck to the Processing building.

5.1.6 Batteries delivered to the Processing building will be fed into a feed hopper and onto a shaker bed, where any dirt or other fine material will be 'shaken off' and captured in a sealed container located below. Clean batteries will then transfer up an inclined conveyor to a shredding plant, where they will be shredded and screened, with 'black mass' material captured in sealed 60 litre containers and transferred off-site as hazardous waste. Remaining material will transfer via conveyor to a drum magnet for ferrous metal separation into a sealed 0.6m^3 container, before passing to an eddy current separator for capture of brass pins and any other non-ferrous metal. Remaining residual materials such as paper, plastic etc will be stored in a dedicated sealed container.

5.1.7 Separated and stored components will be transferred to the Goods Out building, where they will be stored in fireproof concrete bays pending their removal from the Site to authorised off-site facilities.

5.1.8 The Goods Out building will incorporate 4 concrete 'lego' block fireproof bays. Each bay will comprise a rear push wall and two side walls. Bay dimensions will each be 4.8m wide, 3.2m deep and 4m high. Containers will be stored to a maximum height of 3m in each bay. All containers will be removed by Registered Waste Carrier to authorised facilities in accordance with the Duty of Care and Waste Transfer Note procedures.

5.2 SITE PLAN

5.2.1 The Site layout, waste storage areas and fire mitigation infrastructure are shown on Drawing 'Indicative Site Layout and Storage', DW01. A copy of the drawing is included with this FPP. Site drainage is shown on Drawing 'Site Drainage' DW02.

5.3 SENSITIVE RECEPTORS PLAN

5.3.1 Sensitive receptors within a 1km radius of the site are shown on Drawing 'Sensitive Receptors' DW03. The nearest sensitive receptors are also listed in Section 1.2 above.

5.4 PREVAILING WIND DIRECTION AND STRENGTH

5.4.1 Meteorological Office predictions and recordings of local weather data (https://www.metoffice.gov.uk/weather/forecast) will be reviewed by the Site Manager or other Director or Technically Competent Person to allow forward planning and information gathering on the likelihood of adverse or extreme weather and any impacts it could have on the safe and efficient operation of the Site. Daily observations of weather conditions, including wind speed, direction and temperature, will be made so that site operations can be rearranged to adapt to changing conditions where necessary.

5.4.2 Statistics on wind direction and wind speed are based on observations taken from the nearest weather

station at the prevailing wind direction at Cosford/Albrighton (c. 18km west northwest of the site) between November 2009 and January 2024, which indicates that prevailing winds originate predominantly from the south, southwest and west. The location of the Cosford/Albrighton weather station has similar topography to the Site, i.e. located in area of predominantly flat land.

5.4.3 The wind rose data is shown in Figures 1 and 2 below.

Figure 1: Rose diagram showing annual prevailing wind direction

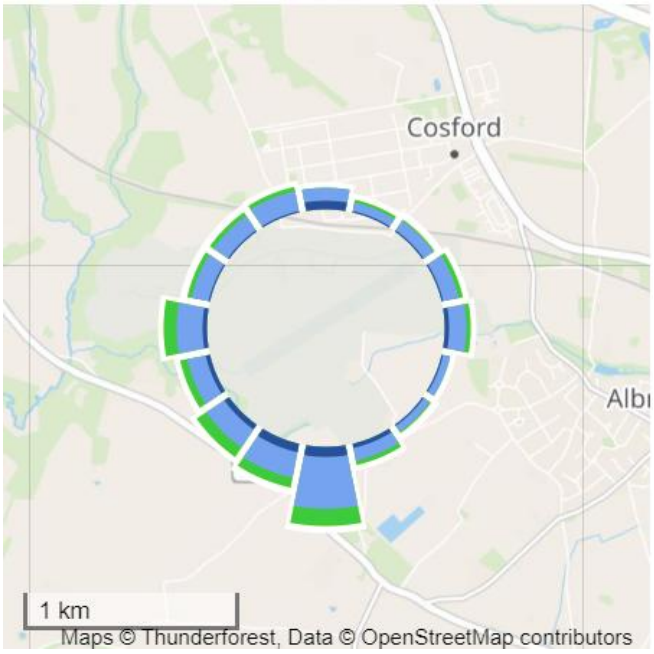
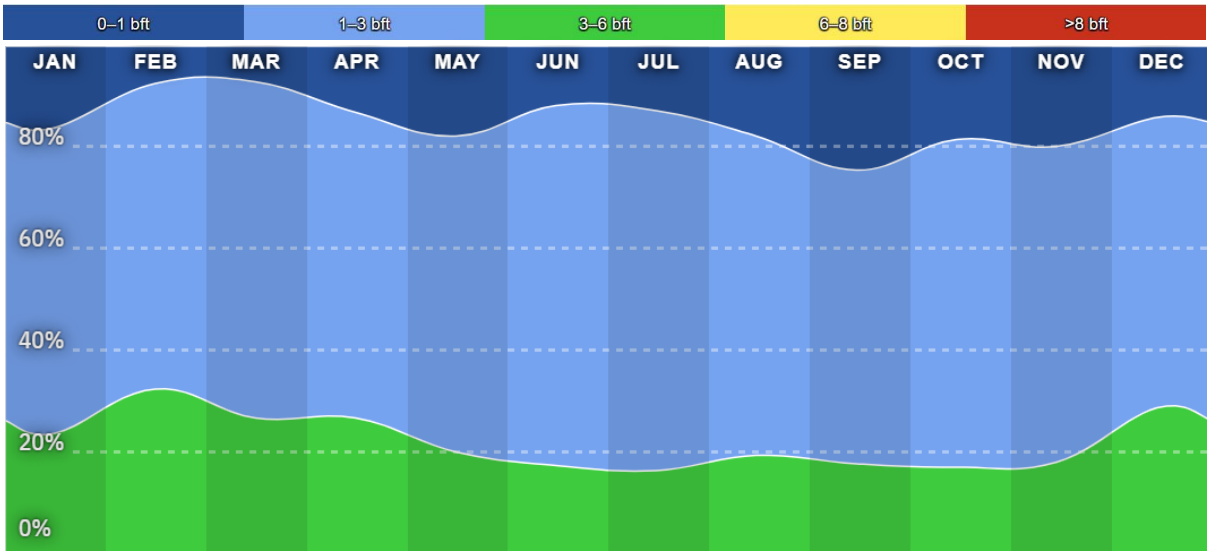


Figure 2 Monthly wind direction and strength distribution



6 MANAGE COMMON CAUSES OF FIRE

6.1 ARSON

6.1.1 The Site is fully secured by a combination of 2.4m high steel mesh and palisade fencing. Lockable security

gates of palisade steel construction (also 2.4m high) are located at the Site entrance off Round Croft. CCTV cameras are also installed for additional security, both internal and external to the buildings.

6.1.2 The Site will be secured and locked outside of operational hours. CCTV cameras send an alarm to the Site Manager and other Directors in the event of any unauthorised access, fire or smoke outside of operational hours.

6.1.3 The high standard of site security to prevent and detect any attempts at unauthorised entry minimises the potential for arson attacks.

6.2 PLANT AND EQUIPMENT

6.2.1 Plant and equipment preventative maintenance procedures and record keeping template are shown in Appendix 2. As a part of these procedures all plant and equipment which require maintenance will be assessed for fire risk. Checks will be programmed and records will be retained with a log of maintenance carried out.

6.2.2 Site vehicles will be fitted with dust filters and fire extinguishers. Vehicles and equipment will be regularly inspected for electrical faults. When not in use vehicles will be stored away from any combustible waste materials.

6.3 ELECTRICAL FAULTS

6.3.1 All electrical work on site will be carried out by fully certified and qualified electricians and will complywith the relevant British Standards for design and installation of electrical equipment. Detailed operational manuals will require equipment to be checked and maintained as part of a planned maintenance regime. Vehicles and equipment will be regularly inspected for electrical faults, including damaged or exposed electrical cables.

6.4 SMOKING POLICY

6.4.1 The Site will operate a strict no smoking policy.

6.5 HOT WORKS SAFE WORKING PRACTICES

6.5.1 A hot works management system will operate on site. This will apply to staff and contractors. A Fire Watch will be carried out after hot works are finished and specifically revisited at the end of the working day by staff trained in the assessment of risks associated with hot work.

6.5.2 The hot works management system is detailed in Table 2 below.

Table 2: Hot Works Management System

Item No	*Source*	*Fuel or Ignition(F or I)*	*Preventative Measure*	*Risk Coding*
1	Hot Works in the form of welding or cutting carried out during maintenance tasks.	I	1) Fire watcher should be appointed 2) Suspension of work 90 mins before shift end	HIGH

Item No	Source	Fuel or Ignition(F or I)	Preventative Measure	Risk Coding
2	Electrical fire from fixed installation.	I	1) Inspection and certification of building electrics	MEDIUM
4	Spark generated by a saw orgrinder used in connection with maintenance task.	I	1) Fire watcher should be appointed 2) Suspension of work 90 mins before shift end	HIGH
5	Fuel tank (2,000 litres of diesel)	F &I	1) Plant requiring fuel should be brought to double skinned fuel tank located on site. 2) Fuel should not be ported in containers to the plant.	HIGH
6	Smoking on Site	I	1) Smoking strictly prohibited on site. 2) Site management to 'Police' 3) No Smoking signage at strategic points, to inform visiting drivers.	MEDIUM
8	Arson	I	Site secured outside of operational hours and monitored by CCTV on a 24 hours, 7 days basis.	LOW
9	Electrical fault from 'Rogue' portable appliance	I	1) All portable appliances should be subject to PAT tests.	MEDIUM
10	Incompatible product on site causes chemical reaction resulting in ignition.	I	1) The Site does not accept waste chemicals, laboratory chemicals or other potentially incompatible materials that may result in chemical or thermal reactions. 2) Strict waste acceptance procedures and visual inspection in place.	LOW

6.5.3 Hot works will not take place on site within 6m of any combustible or flammable waste. A Permit to Work system will be in force for any hot works undertaken on site, see Appendix 3.

6.6 INDUSTRIAL HEATERS

6.6.1 There will be no industrial heaters on site.

6.7 HOT EXHAUSTS AND ENGINE PARTS

6.7.1 All waste storage areas on site will be subject to Fire Watch checks. Inspections will also check for dust build up or fluff settled onto hot exhausts and engines and a check will be made for the emission of any hot sparks from vehicle exhausts on entry and exit to the Site. In the event of dust or fluff build up, engines and exhaust will be allowed to cool and then swept or air blown to remove the material. Removed dust and fluff deposits will then be swept up and suitably disposed of.

6.8 FIRE WATCH PROCEDURES

6.8.1 As a minimum, a Fire Watch will be carried out at the start and end of each working day. All waste storage and processing areas on site will be subject to the Fire Watch checks.

6.8.2 CCTV cameras are installed and used on site to detect any evidence of fire, smoke or hot spots.

6.8.3 Fire Watch checks will be assessed to see if any improved operational procedures can be invoked to reduce risks. Fire watch reviews will also be undertaken out of hours to check for post operational heating issues and procedures will be reviewed after assessment.

6.8.4 Fire Watch procedures are detailed below:

- A trained site operative will provide a continuous fire watch at the start and end of the working day and during any period of Hot Works.
- At the start and end of the working day, the fire watch will be of a duration no less than 30 minutes and inspect all areas of the Site, including all mobile and fixed plant, waste storage and processing areas.
- In the event of any Hot Works, a fire watch will be undertaken immediately at the end of the works and continue for at least 60 minutes, with further checks at regular intervals, of no more than 20 minutes, up to 120 minutes after the cessation of the Hot Works. This is to ensure the working area and all adjacent areas, including the floor, waste storage bays and containers, 6m separation distances, waste processing areas and mobile and fixed plant are free of smouldering materials and flames.
- At least two suitable fire extinguishers must be immediately available in the area of Hot Works. The personnel undertaking the work and providing the fire watch will be trained in their use.
- Personnel involved with the work and providing the fire watch are familiar with the means of escape and method of raising the alarm/calling the Fire & Rescue Service.
- The personnel undertaking the fire watch shall confirm at the end of the inspections that:
    - The work area and all adjacent areas to which sparks and heat might have spread have been inspected and found to be free of smouldering materials and flames
    - Stub ends of welding rods, oxyacetylene burners and any other hot materials have been safely removed
    - All equipment, including gas cylinders, have been safely removed.

6.9 IGNITION SOURCES

6.9.1 Waste will not be burnt at the Site.

6.9.2 There will be no waste incinerator plant or industrial heaters on site.

6.10 SMOKE ALARMS

6.10.1 Smoke alarms are fitted inside each building, including the Site offices.

6.11 INADVERTENTLY RECEIVED NON-PERMITTED BATTERIES

6.11.1 In the event that any non-permitted batteries, such as lead acid or lithium batteries, are inadvertently received at the Site they will be stored in dedicated and sealed quarantine containers for urgent removal

to an authorised waste management facility.

6.11.2 Any inadvertently received lead acid battery will be removed and stored upright in a dedicated and lidded container, with acid proof base.

6.11.3 Any inadvertently received battery that is, or is suspected to be, a lithium or lithium-ion battery will be checked for damage and stored in a separate watertight, lidded container filled with sand or vermiculite. The container will be capable of protecting the battery or batteries stored within it from damage.

6.12 LEAKS AND SPILLAGES OF OIL AND FUELS

6.12.1 Any leaks or spillages of potentially polluting or flammable liquids such as oil and diesel will be cleaned up using dedicated spill kits, see Appendix 4 'Emergency Spillage Procedure'. The location of spill kits is shown of Drawing 'Indicative Site Layout and Storage', DW01.

6.12.2 Contaminated spill kits and absorbent will be stored in a sealed container for authorised disposal offsite.

6.12.3 Leaks and spillages will be treated as a priority incident and upon detection cleaning measures will be implemented immediately. Repairs will be made to any tanks, containers, pipework etc that are found to be leaking.

6.13 BUILD-UP OF LOOSE COMBUSTIBLE WASTE, FLUFF AND DUST

6.13.1 The Site will operate a first in first out policy to ensure batteries are stored, processed anddispatched from the facility typically within 1 week of receipt. As part of this policy, waste storage bays, including the corners, will be emptied and swept every month to ensure all waste, fluff and debris are removed. This prevents the potential for wastes, dust and fluffs to accumulate and build-up.

6.13.2 In the event of an increase in incoming waste receipt or incoming waste loads, the Operator will contract local hauliers to increase the quantities of waste transported off site to authorised facilities to ensure that stock rotation and the emptying, clearing and sweeping of bays at least every month.

6.13.3 Typically, the Site will be swept during the course of the working day and at the end of the working day to ensure the facility is left clean and tidy both during and outside of operational hours. Site sweeping will be carried out by site operatives under the supervision of the Site Manager, other Director or Technically Competent Person.

6.13.4 The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if noticeable waste, dust or fluff accumulation is present or if there is the potential for associated emissions from the Site.

6.14 REACTIONS BETWEEN WASTES

6.14.1 The Site does not accept waste chemicals, laboratory chemicals or other potentially incompatible materials that may result in chemical or thermal reactions etc.

6.15 HOT LOADS

6.15.1 Waste Pre-acceptance Procedures and Waste Acceptance Procedures are detailed in Section 3. As part

of these procedures a visual inspection of the contents of all waste loads, including those received in enclosed containers, will be made during deposit.

6.15.2 Any hot loads inadvertently delivered to the Site will be detected by either the weighbridge staff during delivery or by site operatives during transfer and storage in the Goods Inward building or by pickers in the Picking Station building, where all batteries are subject to visual inspection prior to transfer to the Processing Building.

6.15.3 Any inadvertently delivered hot loads or individual hot battery will be separated from other wastes and transferred to the quarantine bay, which will comprise fireproof concrete push wall and two side walls. The bay will be constructed out of concrete 'lego' blocks, which will meet the requirements of BS 5502-22.2003 Table 7 and Eurocode 2, BS EN 1992-1 and provide a minimum fire resistance period of 2 hours. A 6m separation distance will be maintained in front of the quarantine bay at all times.

6.15.4 The quarantine bay dimensions will be 3m x 3m x 4m high, which will enable waste to be stored up to 3m high and provide a storage capacity of 3m x 3m x 3m high, i.e. 27m^3, i.e. significantly larger than 50% of the capacity of the largest waste pile. The location of the quarantine bay is shown on Drawing 'Indicative Site Layout and Storage' DW01. A hosepipe will be used to apply cooling water and rapidly reduce the temperature where required. There will be adequate hose reel length available to reach the quarantine skip and the quarantine bay from the mains supply.

6.16 HOT AND DRY WEATHER

6.16.1 The Site comprises a series of fully enclosed and roofed buildings, which provide shading at all times. All batteries will be stored and processed inside the buildings.

6.16.2 Should any recycled materials from the battery shredding and separation process, e.g. ferrous metal, be stored on the external yard prior to removal from the Site to customers, they will be kept in sealed and lidded containers. In addition, the external yard is partly afforded shading by the adjacent Site buildings.

6.16.3 During hot weather, external yard locations will be managed to take effect and benefit from shading afforded by the buildings, thereby minimising external heating during hot weather by shading from direct sunlight.

6.16.4 Water will be applied to waste stockpiles, using a hose, during prolonged periods of hot, dry weather to ensure that materials are doused with cooling water.

6.17 HOUSEKEEPING

6.17.1 Housekeeping measures include daily visual inspection of the Site, with a detailed weekly inspection undertaken by the Site Manager, other Director and Technically Competent Person.

6.17.2 The Site will be swept during the course of the working day and at the end of the working day to ensure it is left clean and tidy both during and outside of operational hours. Additional sweeping and cleaning will take place if noticeable waste, dust or fluff accumulation is present or if there is the potential for associated emissions from the Site.

6.17.3 Waste storage bays will be completely emptied and swept, including the corners, at least once per month. This will prevent the accumulation of any dusts or debris at the Site.

6.17.4 Site sweeping will be carried out by site operatives under the supervision of the Site Manager, other

Director or the Technically Competent Person.

7 PREVENT SELF COMBUSTION

7.1 WASTE STORAGE TIMES

7.1.1 The Site will operate a first in first out policy to ensure batteries are stored and processed and the shredded and separated recyclables dispatched from the facility typically within 1 month of receipt, although this may increase to a maximum timescale of two months. This will ensure an efficient waste stockpile rotation and that materials do not accumulate for extended periods of time that can result in excessive heat generation or the build-up of hot spots within the waste mass. Maximum waste stockpile heights will not exceed 3m.

7.2 METHODS USED TO RECORD AND MANAGE WASTE STORAGE

7.2.1 Every delivery of waste to the Site will be recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number or Season Ticket, vehicle registration andother pertinent information against a unique reference number. This allows for the tracking of wastes from arrival on site to dispatch, the generation of reports and waste returns, as well asproviding comprehensive, auditable information.

7.2.2 Waste storage bays will be routinely emptied completely and swept (including the corners of bays) at least every month, although typically this will be every 7 days. Checks will be made during daily site inspections by the Site Manager, other Director or Technically Competent Person to ensure all bays are emptied and cleared completely, thereby ensuring that all materials are processed and dispatched from the Site and not allowed to accumulate over extended periods of time.

7.3 MONITOR AND CONTROL TEMPERATURE

7.3.1 It is highly unlikely that spontaneous ignition of waste will occur on site, due to the Operator's first in first out policy and the frequent removal of wastes from the Site. The FPP guidance states that where wastes are stored for longer than 3 months, extra measures must be undertaken to prevent self-combustion, such as monitoring temperatures in the waste. However, as the Site will not store wastes for longer than 2 months, temperature monitoring should not be necessary.

7.3.2 The Site incorporate CCTV cameras strategically placed to monitor the waste storage and processing areas, as well as areas external to the buildings. The cameras send an alarm to the mobile phones of the Site Manager and other Directors in the event of unauthorised access, fire or smoke outside of operational hours. Therefore the Site Manager and other Directors can implement emergency measures immediately.

7.3.3 Waste stockpile heights on site will not exceed 3m.

7.4 DEALING WITH HOT WEATHER AND HEATING FROM SUNLIGHT

7.4.1 Shading of the Site will be afforded by the storage and processing of all batteries in roofed and fully enclosed buildings. In addition, the external yard is partly afforded shading by the adjacent site buildings.

7.4.2 Water will be applied to waste stockpiles, using a hose or water bowser, during hot weather and in any periods of intense heating from the sunlight. This will reduce temperatures. In such circumstances the waste pile will be spread out and water applied to ensure that all materials withinthe core of the stockpile (and not just external edges) are doused with cooling water.

7.5 WASTE BALE STORAGE

7.5.1 Wastes will not be baled on site.

8 MANAGING WASTE PILES

8.1 STORING WASTES IN THEIR LARGEST FORM

8.1.1 The purpose of the Site is to shred and separate non-hazardous alkaline batteries into their component parts, namely black mass', ferrous metal, brass pins, other non-ferrous metals and any residual cardboard, paper or plastic. This will maximise the recycling and recovery of non-hazardous materials.

8.1.2 Recycled and recovered materials are stored in dedicated containers in their largest form.

8.2 MAXIMUM PILE SIZES

8.2.1 Waste stockpile sizes are shown in Table 3 below and locations are shown on Drawing 'Indicative Site Layout and Storage', DW01.

8.3 WASTE STORED IN CONTAINERS

8.3.1 Typically batteries will be delivered to the Site in 1 tonnes 'big bays' or in purposely designed, sealed storage containers. Suitable batteries will be transferred by forklift truck to the waste storage bays inside the Goods Inward building, for onwards transfer to the Picking Station building and Processing building.

8.3.2 Shredded and separated batteries will be managed as follows:

- Black mass will be stored in sealed and lidded 60 litre containers;
- Ferrous metal will be stored in dedicated, sealed containers up to 1.2m^3 capacity;
- Brass pins will be stored in dedicated, sealed containers up to 1.2m^3 capacity;
- Non-ferrous metals will be stored in dedicated, sealed containers up to 1.2m^3 capacity;
- Any residual cardboard, paper or plastic from the battery shredding and separation process will be stored in dedicated, sealed and lidded containers up to 1.2m^3 capacity.

8.3.3 Any skips or containers larger than 1.1m^3 capacity will be accessible from at least 2 sides to ensure each one can be easily accessed in the event of a fire.

Table 3: Waste Stockpile Sizes

Waste stream	Location	How it is stored	Maximum length	Maximum width	Maximum height of waste	Volume	Maximum storage time
Alkaline Batteries (AA and AAA)	See drawing DW01	Goods Inward Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	1 Month
Alkaline Batteries (AA and AAA)	See drawing DW01	Goods Inward Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	1 Month
Alkaline Batteries (AA and AAA)	See drawing DW01	Goods Inward Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	1 Month
Alkaline Batteries (AA and AAA)	See drawing DW01	Goods Inward Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	1 Month
Inadvertently Received Contraries or Non-permitted Batteries	See drawing DW01	Picking Station Building Sealed and Lidded Quarantine Container	1.2m^3 Quarantine Container			1.2m^3	4 Days
Black Mass	See drawing DW01	Processing Building 6o Litres Container	60 Litres			60 Litres	4 Days
Ferrous Metal	See drawing DW01	Processing Building Skip	1.2m^3 Skip			1.2m^3	4 Days

Waste stream	Location	How it is stored	Maximum length	Maximum width	Maximum height of waste	Volume	Maximum storage time
Non-Ferrous Metals	See drawing DW01	Processing Building Skip	1.2m^3 Skip			1.2m^3	4 Days
Brass Pins	See drawing DW01	Processing Building Skip	1.2m^3 Skip			1.2m^3	4 Days
Residual Card, Paper and Plastic from Shredded and Separated Batteries	See drawing DW01	Processing Building Skip	1.2m^3 Skip			1.2m^3	4 Days
Black Mass	See drawing DW01	Goods Out Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	2 Months (from receipt of battery to dispatch of recyclate)
Ferrous Metal	See drawing DW01	Goods Out Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	2 Months (from receipt of battery to dispatch of recyclate)
Non-Ferrous Metals	See drawing DW01	Goods Out Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	2 Months (from receipt of battery to dispatch of recyclate)
Brass Pins	See drawing DW01	Goods Out Building Fireproof Bay	4.8m	3.2m	3m	46.08m^3 (length x width x height)	2 Months (from receipt of battery to dispatch of recyclate)

9 PREVENT FIRE SPREADING

9.1 SEPARATION DISTANCES

9.1.1 The principal means of preventing fire spreading will be the storage of wastes in roofed buildings, fitted with internal fireproof concrete bay walls. However, a minimum 6m separation distance will be maintained in front of all the bays, including the quarantine bay. In addition, 6m separation distances will be maintained around the overnight mobile plant parking areas and the picking station hopper/conveyor arrangement and the battery shredding and processing line.

9.2 FIRE WALLS CONSTRUCTION STANDARDS

9.2.1 The fireproof bay walls in the Goods Inward building and Goods Out building will comprise concrete lego blocks walls. The specification of each block will meet the requirements of Class A1 Fire Resistance in accordance with Clause 4.3.4.4 of EN13369 and provide a minimum fire resistance of 2 hours. Supplier specification details of the concrete 'lego' blocks are provided in Appendix 6. Individual block sizes are 1.6 long and 0.8m high.

9.2.2 Fireproof concrete bays will comprise rear push wall and 2 side walls in all cases.

9.3 STORING WASTE IN BAYS

9.3.1 The fireproof waste storage bays will resist radiative heat and flaming and provide suitable fire resistance.

9.3.2 The Site operates a rapid turnover of wastes and uses a first in first out policy to ensure alkaline batteries are typically stored, processed and dispatched from the Site within 1 month of receipt and within a maximum period of 2 months. The corners of bays will also be swept and cleared at least monthly to ensure there is no accumulation of materials over an extended time. This prevents the potential for any build-up of heat or hotspots within the waste mass.

9.3.3 The site incorporates CCTV cameras for continuous surveillance on a 24 x 7 basis.

9.3.4 A minimum 1m high freeboard will be maintained between the top of the waste pile and the height of the bay walls to ensure that fire is prevented from licking over from one bay into another in the event of a fire incident. A line will be cleared painted on the inside of each bay, 1m below the top of the bay walls, to denote the maximum height of waste storage.

9.3.5 In the event of a fire incident wastes that are at risk of ignition will be removed to the quarantine bay by trained site operatives, providing it is safe to do so. This will be regarded as an emergency incident to ensure that a bay with burning waste is quickly isolated from other materials and equipment that are not on fire.

10 QUARANTINE AREA

10.1 QUARANTINE AREA LOCATION AND SIZE

10.1.1 A quarantine bay is designated in the Goods Out building, its location is shown on Drawing 'Indicative

Site Layout and Storage-DW01'. The quarantine bay will be constructed out of concrete 'lego' blocks, which will meet the requirements of BS 5502-22.2003 Table 7 and Eurocode 2, BS EN 1992-1 and provide a minimum fire resistance period of 2 hours. A 6m separation distance will be maintained in front of the quarantine bay at all times.

10.1.2 The quarantine bay dimensions will be 3.2m x 3.2m x 4m high, which will enable waste to be stored up to 3m high and provide a storage capacity of 3.2m x 3.2m x 3m high, i.e. 30.72m^3, i.e. significantly larger than 50% of the capacity of the largest waste pile (50% of 46.08m^3 = 23.04m^3). A hosepipe will be used to apply cooling water and rapidly reduce the temperature where required. There will be adequate hose reel length available to reach the quarantine skip and the quarantine bay from the mains supply.

10.1.3 The quarantine bay will be kept clear and empty of materials and wastes at all times, other than during a fire incident or the inadvertent receipt of hot loads. Once a hot load has sufficiently cooled and doused with cooling water using the hose, it will be immediately removed from the quarantine bay to an authorised facility. Any inadvertently received non-permitted wastes (apart from hot loads) will be placed in a quarantine skip or container for priority removal from the Site, so the quarantine bay remains clear.

10.2 USE OF QUARANTINE AREA IN THE EVENT OF A FIRE

10.2.1 In the event of a fire incident, the quarantine bay will be used as temporary and safe storage to isolate unburned materials, plant and equipment that are moved there by trained site operatives to prevent the fire spreading. Alternatively, burnt and hot materials may instead be moved to the quarantine bay to isolate them from the rest of the site until they are cooled and safe enough to remove from the facility.

10.2.2 The removal of high-risk wastes to the quarantine bay will be regarded as a priority during a fire incident and materials moved as a matter of urgency and, as a worst-case scenario, within 1 hour of the fire starting.

10.2.3 The Site is equipped with a forklift truck. Trained site operatives will be used to moved materials to the quarantine bay, i.e. members of staff with the appropriate mobile plant licences and experience, under the direction of either the fire service (if in attendance) or the Site Manager, other Director or Technically Competent Person. Staff will move materials on site using the forklift truck every working day and are very experienced at carrying this out.

10.2.4 In the event of a fire incident outside of operational hours, site personnel, including the Site Manager (who is also one of the three Directors), the other Directors and other trained operatives can attend the facility within 30 minutes. As the Site Manager, other company Directors and trained site operatives can operate the forklift truck, materials and waste can be moved quickly to the quarantine bay at all times of the day.

10.2.5 The quarantine bay will be clearly identified on site and marked to allow the segregation of identified unsuitable material and separation from incoming waste. Quarantined waste will be removed as soon as practicable in appropriate vehicles and properly disposed of at a suitably authorised site.

10.3 PROCEDURE TO REMOVE MATERIALS TEMPORARILY STORED IN THE QUARANTINE AREA

10.3.1 Waste and materials stored in the quarantine bay will only be removed when it is safe to do so.

10.3.2 In the event that unburnt waste, plant and equipment etc has been moved to the quarantine bay for safe storage and to prevent a fire spreading, it shall be moved back to its normal location once it is safe to do so and the burnt materials have cooled and been safely removed.

10.3.3 Where the quarantine bay is used to isolate hot loads or wastes etc that are on fire, once these have been safely cooled by the use of fire-fighting water, the ashes and residues will be removed off site to authorised facilities.

11 DETECTING FIRES

11.1 DETECTION SYSTEMS

11.1.1 The Site is equipped with a comprehensive CCTV system that provides coverage of all the facility, including the waste storage and processing areas and the external areas and perimeters of the yard. The CCTV cameras include motion detection.

11.1.2 During the working day, operational areas of the Site will be in constant attendance by site operatives, so that in the event of a fire incident or smoke emission an alarm would be raised and mitigation measures implemented immediately.

11.1.3 The Site Manager will be responsibly for phoning the Fire Service in the event of a fire during operational hours.

11.1.4 In the event that the Site Manager is on annual leave or is absent due to sickness or other absence, the other company Directors and Technically Competent Person will assume responsibility and contact the Fire Service accordingly.

11.2 FIRE DETECTION OUTSIDE OF OPERATIONAL HOURS

11.2.1 The Site is equipped with a comprehensive CCTV system, which provides coverage of the entire site on a 24 hours, 7 days basis. In the event of unauthorised entry, fire or smoke outside of operational hours, the CCTV camera system sends an alarm to the Site Manager and other Directors mobile phones, which are left on at all times. In the event of a fire incident outside of operational hours, the Site Manager and other Directors will immediately contact one another and call the Fire Service. Site personnel live locally and can attend an out of hours fire incident within 30 minutes.

11.3 DETECTION SYSTEMN CERTIFICATE

11.3.1 The CCTV cameras currently on site will be maintained by a contractor who is covered by an appropriate UKAS-accredited third-party certification scheme.

11.4 FIRE EMERGENCY PROCEDURE

11.4.1 Emergency Fire Procedures comprise the following key points:

Staff Action on Discovering Smoke/Fire

- Raise the alarm.
- Contact the Fire Service immediately.

Trained Site Operatives

- Trained site staff will attempt to fight the fire with the hosepipes and fire extinguishers, but only if necessary and safe to do so (note that automatic ceiling mounted fire extinguishers are designed to automatically activate and extinguish a fire in the event of an incident).
- Move high-risk wastes or equipment that is at risk of catching fire to the quarantine bay as a matter of urgency or as an absolute worst-case scenario, within 1 hour of the fire starting.
- Assist the Fire Service as directed by them.

Staff Action on Hearing the Fire Alarm

- Leave the site immediately, and direct visitors to the nearest, safest exit.
- Do **not** wait to establish whether it is a false alarm.
- Do **not** stop to collect personal belongings.
- Close all doors behind you and where practical and possible, do not run or shout – this can cause panic.
- Do **not** take risks.
- Do **not** return to the Site for any reason until authorised to do so by the Fire Service or Fire Marshal.
- Report to the Assembly Point on Round Croft.

Duties of the Fire Marshals

- To monitor the fire precautions for the Site.
- To act as a focal point for staff.
- To coordinate and assist with the evacuation procedure.
- Notify the Site Manager and other Directors of any missing person or that the Site is cleared.

Other Individuals

- **Contractors**
  - Outside contractors must be made aware of the fire procedures for the Site.
  - Where contractors are working within the normally occupied areas it will be the responsibility of the fire marshal to ensure they have evacuated.
- **Visitors**
  - All visitors need to report to the Site office and sign in and sign out on their departure.
  - Visitors must be accompanied at all times by a member of staff. This is for both safety reasons as well as for those of security.
  - It is the responsibility of the staff to ensure that accompanied visitors follow the fire procedures of the building.

12 SUPPRESSING FIRES

12.1 SUPPRESSION SYSTEM IN USE

12.1.1 The Site is equipped with a series of fire extinguishers and a water hose, see Drawing 'Indicative Site Layout', DW01.

12.1.2 Environment Agency Guidance 'Fire prevention plans: environmental permits' (last updated 11 January 2021) states:

"If you store waste in a building, you must install a fire suppression system. This system should be proportionate to the nature and scale of waste management activities you carry out and the associated risks."

12.1.3 The Operator proposes to install ten under-roof mounted extinguishers (see Figure 3 below for illustration) in the buildings, i.e. above the waste storage bays and the battery shredding and separation line. The ceiling mounted ABC Powder Automatic Fire Suppression System incorporates automatic detection and self-activates in the event of a fire. The extinguishers use mono ammonium phosphate powder and are designed to extinguish flammable liquids, flammable gases, electrical fires, paper and wood fires (i.e. class A, B, C, and electrically started fires).

12.1.4 Each 10kg unit incorporates a quartzoid bulb that automatically breaks at 68°C, releasing the mono ammonium phosphate powder over an area of up to 28m^2. The use 10 x 10kg units will provide complete coverage of waste storage areas in the Goods Inward and Goods Out buildings and above the battery processing line.

12.1.5 ABC Powder Automatic Fire Suppression Systems have been approved by the Environment Agency, via Fire Prevention Plans, for a number of end-of-life vehicle and waste sites in the England.

Figure 3: Ceiling Mounted ABC Powder Automatic Fire Suppression System

12.1.6 The ABC Powder Automatic Fire Suppression System is CE Marked, UKCA approved and BSI tested. Installation and annual servicing will be undertaken in accordance with British Standard BS5036-3 and conducted by a third-party, appropriately trained technician.

12.1.7 Records of training, testing and maintenance of fire extinguishers will be kept.

13 FIRE FIGHTING TECHNIQUES

13.1 ACTIVE FIRE FIGHTING

13.1.1 The Site is equipped with a forklift truck, which can be used by trained site operatives to move materials in the event of a fire or assist the Fire Service if requested to do so by them.

13.1.2 The Site is equipped to fight fire by:

- Applying water to cool unburned materials and other hazards;
- Separate unburned materials from the fire using the fork-lift truck;
- Using plant and equipment to separate burning materials from the fire after they have been quenched using the fire hose and fire extinguishers etc.

13.1.3 Fire residues and materials contaminated as a result of a fire will be removed from the Site as quickly as possible, once it is safe to do so and they have sufficiently cooled. Residues and contaminated materials will be removed off site to suitably authorised facilities.

13.1.4 Site staff will only be used to fight fire where they are suitably trained and it is safe to do so. If the Fire Service attend the Site to deal with an incident, site staff will liaise with the fire fighters and follow their instruction.

14 WATER SUPPLIES

14.1 AVAILABLE WATER SUPPLY

14.1.1 Environment Agency guidance on Fire Prevention Plans states that a 300m^3 stockpile of combustible waste must have a water supply of at least 2m^3 per minute for a minimum of 3 hours, i.e. 360m^3 water supply in total. This rate is proportional and as the largest combustible waste stockpile on site has a capacity of 46.08m^3, this equates to a water requirement of 55.3m^3.

14.1.2 West Midlands Fire and Rescue Service has confirmed that there are two fire hydrants adjacent to the Site's northern boundary on Round Croft. Both hydrants are in close proximity to the Site access gates (significantly less than 100m distance). The Fire Service has confirmed that both hydrants have been inspected and are in working order, see Appendix 5.

14.1.3 The minimum flow rate of a fire hydrant is 8 litres per second or 86,400 litres (i.e. 86.4m^3) over a 3 hours period. As the Site has a water availability requirement of 55,300 litres over 3 hours (i.e. 55/m^3), this meets the water availability requirements of the guidance.

15 MANAGING FIRE WATER

15.1 CONTAINING FIRE WATER RUN-OFF

15.1.1 In the event of a fire, the Operator proposes to contain firewater inside the buildings using free standing

temporary water barriers.

15.1.2 The buildings each incorporate an impermeable concrete floor, with no internal drains. Placement of water barriers across the building access doors would create a reservoir within the buildings, preventing the escape of potentially contaminated firewater. This would enable the Fire Service to access the fire and apply water over the top of the barriers to the fire.

15.1.3 These barriers are 0.5m high and are designed for rapid response on hard and even surfaces, including concrete and tarmac. The barriers are slotted together to form a continuous barrier. They are light weight, easy to carry and can be installed by site operatives within a few minutes. The water barriers are illustrated in Plate 1 below.

Plate 1

15.1.4 The surface area of the buildings circa 1,785m^2. The placement of 0.5m high solid barriers would create a reservoir of up to 892.5m^3, which is easily sufficient to contain the maximum amount of firewater that is likely to be necessary to extinguish a fire, i.e. 55.3m^3.

15.1.5 All captured firewater would be tankered off site to authorised wastewater treatment works. It will not be discharged to foul sewer.

15.1.6 After use and the removal of firewater by road-tanker, the water barriers would be allowed to dry, dismantled and the stacked for future use if required. They would be stored in the Site office building, next to the drain mats, at the location shown on Drawing 'Indicative Site Layout and Storage', DW01. This will ensure they are stored away from moving plant and kept safe for future use if required. They have a design life of 20 years.

15.1.7 Visual inspection of the water barriers will form part of the weekly inspection checks to ensure that no inadvertent damage or deterioration has occurred during their storage. In the event that any water barrier or barriers are found to be damaged or deteriorated to be unfit for use, they will be replaced by new units sourced from a suitable supplier as a matter of urgency.

15.2 DRAIN MATS

15.2.1 Heavy duty drain covers, measuring 460mm x 460mm x 3mm thick will be available for emergency use during a fire incident (see Plate 2). They are made of polyurethane and are resistant to water, oil, and chemical attack. The drain covers have overlapping edges, which enables the mats to be placed side by

side to create an effective seal and block off drain entrances to prevent any escape of firewater. Due to their polyurethane composition, they are easy to clean and wash off with water.

Plate 2:

15.2.2 In the event of a fire incident, a trained site operative will place the drain covers over external site drains that may be impacted by firewater runoff to prevent discharge to the public sewer. Site operatives will take care to ensure all the drains are covered. Where more than one drain mat is required to cover and seal a drain, the edges of the mats will be overlapped to ensure an effective seal between the two units. The contact side of the drain covers is sticky, which creates an effective seal around the drain.

15.2.3 Once the fire has been extinguished and the firewater tankered off site to an authorised wastewater treatment works, the drain covers will be removed, washed down with a hosepipe or bucket of water and brush and allowed to dry before storage for future use. Drain mats will not be exposed to direct sunlight during storage. They will be stored in the Site office building, at the location shown on Drawing 'Indicative Site Layout and Storage', DW01.

16 DURING AND AFTER AN INCIDENT

16.1 DEALING WITH ISSUES DURING A FIRE

16.1.1 In the event of a fire incident on site, waste import will cease and delivery drivers will be contacted with instructions to divert wastes to an alternative authorised site.

16.1.2 Waste deliveries will only recommence when the fire has been extinguished and residues sufficiently cooled and cleared so that they no longer pose any fire risk.

16.2 NOTIFYING RESIDENTS AND BUSINESSES

16.2.1 Adjacent businesses and other high-risk receptors (see Table 2) will be contacted and informed of the fire incident.

16.2.2 The Environment Agency will be notified as soon as a fire incident occurs and local media contacted where appropriate so that people living and working in the wider area can be notified. Due to the highly urbanised nature of the local environ, it is not possible for the Operator to contact every business and

household individually within a 1km radius of the Site, as there are several thousand properties within this area. However, the incident will be notified to the relevant authorities and NHS so that people are aware of any potential risks from smoke etc.

16.3 CLEANING AND DECONTAMINATION AFTER A FIRE

16.3.1 Cleaning and decontamination procedures following a fire will comprise:

- Removing ashes, residues and any equipment or plant etc that has been fire damaged and cannot be repaired to a suitably authorised facility. Materials will only be moved once they have sufficiently cooled to no longer pose a fire risk;
- Remove any contaminated fire water to a suitably authorised treatment facility;
- Removal of any contaminated waste to a suitably authorised facility for disposal;
- Undertake any required repairs to infrastructure, plant and equipment that has been damaged as a result of the fire;
- Liaise and fully co-operate with the Fire Service, Environment Agency and other regulatory bodies, as appropriate;
- Review and update FPP, EMS and staff training, as appropriate.

16.4 RECOMMENCEMENT OF OPERATIONS AFTER A FIRE

16.4.1 Once it is safe to do so and the infrastructure, plant and equipment necessary to operate the Site in accordance with the Environmental Permit has been repaired or replaced, the facility will recommence waste deliveries and processing.

16.4.2 In the event that unburnt waste, plant and equipment etc has been moved to the quarantine bay for safe storage and to prevent a fire spreading, it shall be moved back to its normal location once it is safe to do so and any burnt materials have cooled and been safely removed.

16.4.3 Where the quarantine bay is used to isolate hot loads or wastes etc once they have been safely quenched by the use of fire-fighting water, any ashes and residues will be removed off site to authorised facilities.

APPENDIX 1:

Record of non-conformance

Record of non-conformance	
Date and time non-conformance identified	
What happened, what was it about?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify the Environment Agency on 03708 506 506 (open 24hours/day) **Have you done so?**	**Yes/No/not applicable** **Time:** **Date:** **Environment Agency Incident number:**
Please print name and sign:	

APPENDIX 2:

Preventative Maintenance Checklist

Machine Type							
Task	**Daily**	**Weekly**	**Monthly**	**Quarterly**	**Bi-Annually**	**Annually**	
Verify the functionality of emergency stop buttons.							
Inspect safety guards and barriers integrity.							
Ensure access to fire extinguishers, exits, and safety equipment.							
Check belt tension and alignment.							
Inspect rollers and bearings for wear or damage.							
Check spray nozzles for clogs or improper flow.							
Check Oil and Grease Levels (Refill and Grease If Necessary)							
Inspect tank levels and cleanliness.							
Inspect all rotating parts for wear and lubricate as necessary.							
Check true run of the upward conveyor belts							
Lubricate extruder seals							
Tighten loose bolts, screws, and fittings							
Clean dust on top of the covers and inside screw panels							
Lamp test of fire pump panels							
Visual inspection of all electrical control panels and isolators							
Test and service dust suppression.							
Replace any worn conveyor belts, screens, or seals.							
Inspect and clean fans, ducts, and air circulation systems.							
Update risk assessments and maintenance schedules.							
Test electrical systems.							
Check Deflection Roller Bearings For Damage And Check They Run Smoothly.							
Check Hydraulic Level On Maintenance Unit Of Compressed Air Supply Unit							
Push In Emergency Stops To Ensure They Work Properly							
Clean And Check Operation Of Cooling Units On Electrical Cabinets							
Check Tensions And Running Condition Of All Belts.							
Change Oil At Conveyor Belt Motors							
Change V-Belts							

APPENDIX 3:

Permit To Work

Permit to Work – Hot Works

Issued To (to be completed by the Authorising person -Maintenance dept)			Date:				
Company							
Permit No.		Location of work					
POWRA (point of work risk assessment) must be completed and attached with this permit POWRA reference number							
Work covered by the Permit	Oxy-Acetylene Cutting			Yes		No	
	Oxy-Acetylene Welding			Yes		No	
	Angle Grinder / Skill saw			Yes		No	
	Other Welding			Yes		No	
	Other Spark Producing Equipment -Please Specify			Yes		No	

Precautions to be taken before hot work is carried out						
a. Have all tools /Plant and Equipment been thoroughly inspected to ensure safe operation?	Yes		No		N/A	
b. Has the work area been screened, protected and warning signs been placed?	Yes		No		N/A	
c. Have all combustible materials (combustible / Flammable liquids, vapours, LPG gases etc) around the work area been removed or protected against heat and sparks?	Yes		No		N/A	
d. Is there a fire extinguisher appropriate for the task, in date and immediately to hand?	Yes		No		N/A	
e. If necessary, have all systems associated with the task been isolated? *(If YES isolation permit required no option)*	Yes		No		N/A	
f. Where the hot work is likely to activate smoke / heat alarms have they been isolated?	Yes		No		N/A	
g. Have all operatives been briefed on the action to be taken in case of a fire?	Yes		No		N/A	
h. Has the site manager inspected the area for all the above prior to the Hot Work commencing?	Yes		No		N/A	
i. Have you completed a POWRA (point of work risk assessment)	Yes		No		N/A	
j. Do you have a "fire watch observer" in place? *Fire watch observer to stay in place for 60 minutes after the completion of the hot work activities*	Yes		No		N/A	
Comments:						

Duration of Permit				
This Permit to work is valid between (maximum duration one shift)	Hours		Hours	

APPENDIX 4:

Refuelling and Emergency Procedure

REFUELLING AND EMERGENCY SPILLAGE PROCEDURE

INTRODUCTION

Environmental Risk

Risk of environmental pollution incidents from the Site are considered to be suspended solids from the deposit and processing of wastes and fuel or oil in the event of a spillage from either a mobile fuel bowser, diesel or oil container or tank.

Mobile plant will be operated in accordance with manufacturers' guidelines and will be routinely inspected and maintained.

To reduce the risk of environmental pollution with regards to potential spillages of fuels the following Refuelling Procedure will be adhered to at all times. In the unlikely event that a fuel spillage does occur then the Emergency Spillage Procedure will be implemented.

REFUELLING PROCEDURE

Aim

To effectively control the risk of pollution that has the potential to arise from the delivery of fuel to mobile plant on Site.

Steps to be followed

The person carrying out re-fuelling must remain with the item of plant at all times observing the operation.

The fuel tank on the item of plant must be checked in order to determine the amount of fuel required.

The fuel nozzle is secured by lock. Before use the fuel nozzle, the hose must be checked for leaks or damage. If any are located, the Site Supervisor or Manager must be informed and they will arrange for remedial action.

The fuel nozzle must be kept upright between the fuel tank and mobile bowser to avoid any splashes / leaks.

Although an automatic cut-off is fitted to the fuel nozzle, do not rely on it totally to prevent any splashes.

Any spillages must be cleared up using absorbent material, following the Emergency Fuel Spillage Procedure below.

EMERGENCY SPILLAGE PROCEDURE

Aim

To ensure that any fuel spillages are contained within an area and cause minimal environmental impact.

Steps to be followed

Small scale Fuel Spill

A small fuel spill is one caused by things such as a splash or spill of fuel whilst filling an item of plant or machinery. The volumes involved are small and are confined to a small area.

If a small spill does occur the spill needs to be covered with absorbent granules from a spill kit.

The absorbent material should be allowed to cover the spill for a sufficient amount of time to allow it to soak up the fuel contamination.

Once the absorbent material has soaked up the spill it should be removed to a quarantine skip for non-conforming waste. From there the waste should be exported off Site to a facility permitted to accept the waste types and all relevant documentation should be maintained by the Operator.

Report to the Site Supervisor or Manager any materials that have been used and need replacing.

Large Fuel Spill

In the event of a major spillage of diesel, oil or lubricants, the essential action to be taken is to prevent the spillage migrating to a position / sensitive receptor where it could cause contamination.

This can be done by:

- Diverting the spillage away from such an area;
- Bunding the spill using pollution socks / sand / soil; and
- Placing absorbent materials on the spillage.

If the spillage is major, it is essential that instant action is taken, using the emergency spill-kits.

If possible, you should try to prevent any further spillage from the source e.g. by turning off the diesel pump, turning off a valve or blocking a hole in the fuel tank.

Protect any nearby drains by placing pollution socks or booms around them, using enough to totally enclose the entrances.

The spill should be reported as soon as reasonably possible to the Site Manager and Environment Agency.

Use the absorbent mats to clear up the spillage and seek specialist advice from appropriate contractors.

Once the absorbent material has soaked up the spill it should be removed to the area of non-conforming waste. From there the waste should be exported off Site to a facility permitted to accept the waste types and all relevant documentation should be held on site.

Report to the Site Supervisor or Manager any materials that have been used and need replacing.

Consequences of not following procedures:

If a spill occurs and the following procedures are not followed, then the Site runs the risk of causing pollution to the surrounding land and water courses. This may result in action being taken against the Site Operator/Permit Holder.

Trade name	State	UN number	Location	Type of containment	Relevant health and environmental properties
Diesel	Liquid	1202	Transported via a mobile bowser, purpose designed container/drum	Mobile bowser / container / drum	H226 - Flammable liquid and vapour. H304 - May be fatal if swallowed and enters airways. H315 - Causes skin irritation. H332 - Harmful if inhaled. H351 - Suspected of causing cancer. H373 - May cause damage to organs through prolonged or repeated exposure. H411 - Toxic to aquatic life with long lasting effects. R20 - Harmful by inhalation. R38 - Irritating to skin. R40 - Limited evidence of a carcinogenic effect. R51 - Toxic to aquatic organisms. R53 - May cause long-term adverse effects in the aquatic environment. R65 - Harmful: may cause lung damage if swallowed. (***EU, 1967***)

APPENDIX 5:

Correspondence From West Midlands Fire Service

From: Joanne Mills <joanne.mills@wmfs.net>
Sent: 25 July 2025 11:13
To: Stephen Barnes <s.barnes@wasteandindustry.co.uk>
Cc: CELLSAFE LTD <cellsafeuk@gmail.com>
Subject: Re: Request for information re fire hydrants in vicinity of Units 1 to 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2NP

OFFICIAL

Hello Stephen

Please find attached the plan around the building it shows three current Fire hydrants we are responsible for. All have been inspected and are in working order

Jo Mills

Water Officer

07969914537

West Midlands Fire Service Oldbury

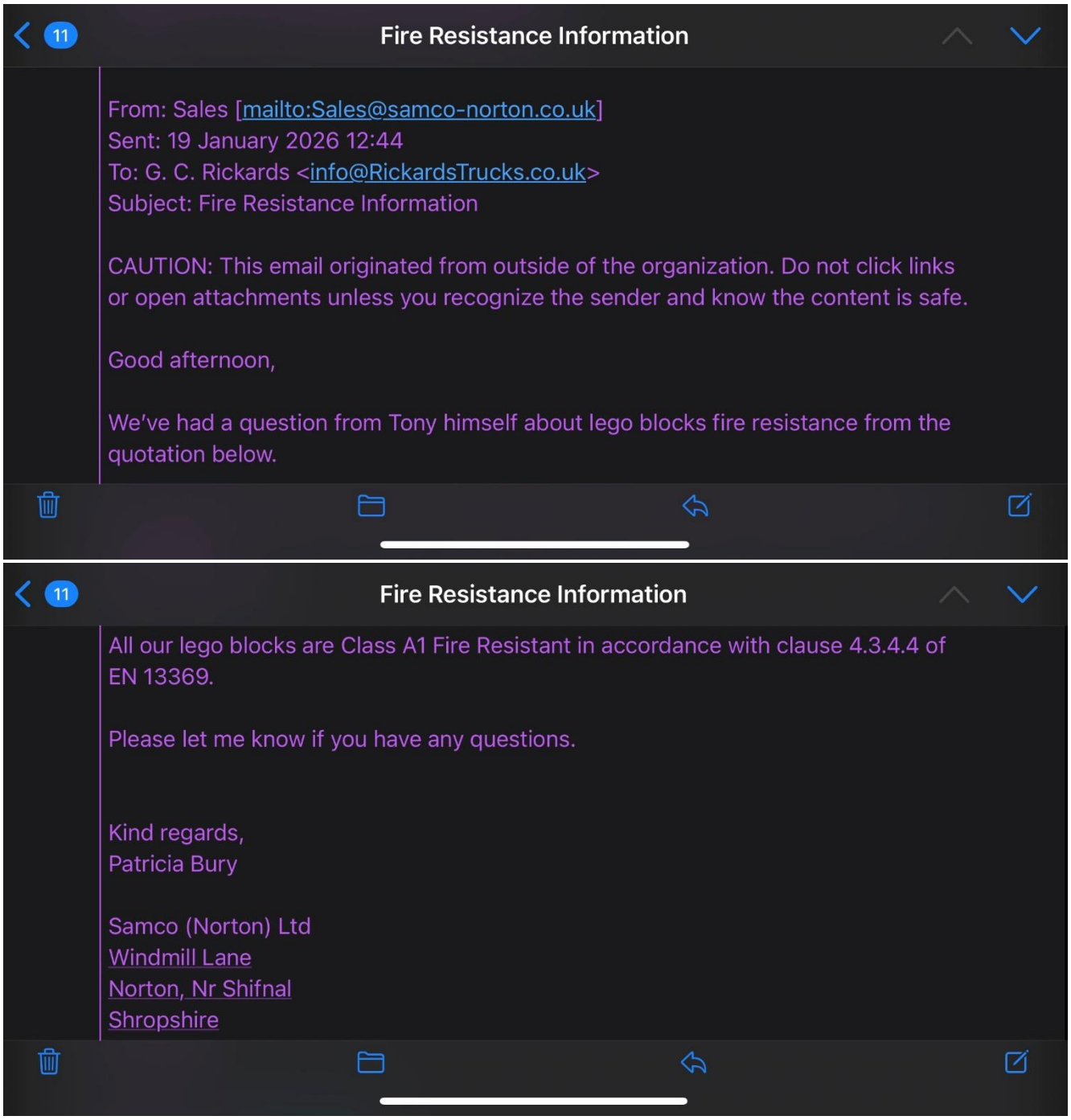
Old Park Lane

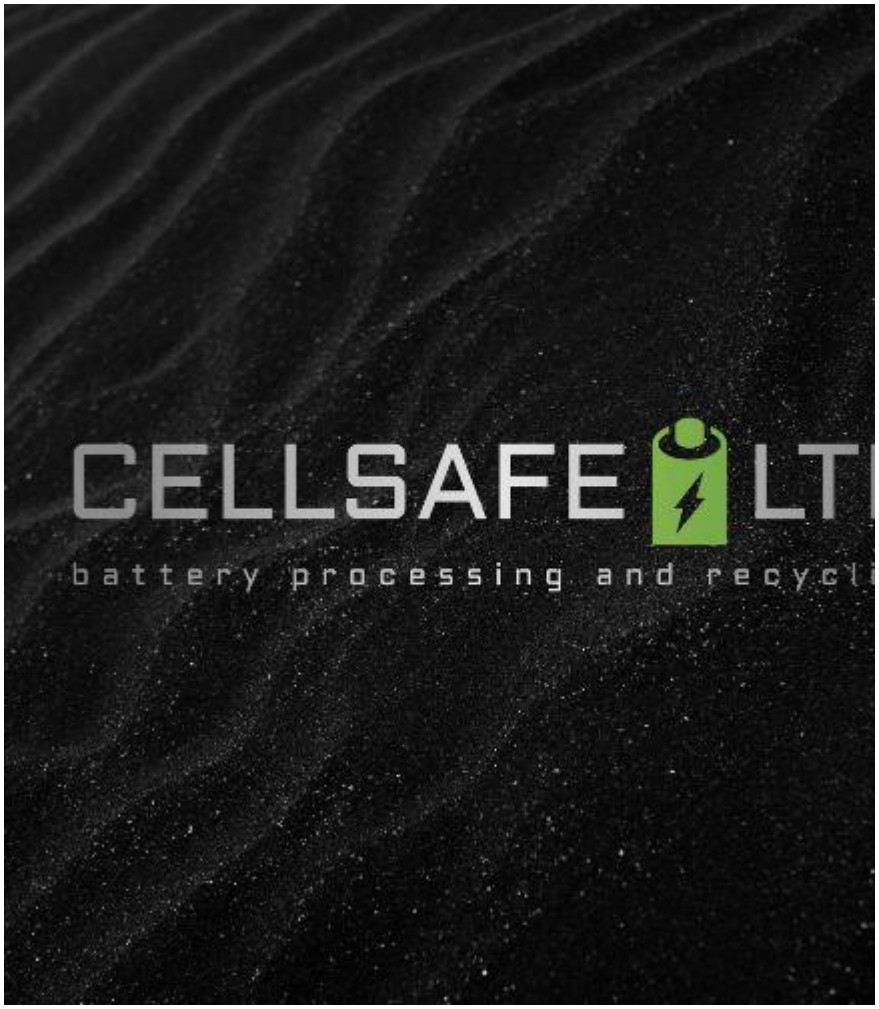
Oldbury

B69 4PU

Joanne.mills@wmfs.net

APPENDIX 6:


11
Fire Resistance Information
From: Sales [mailto:Sales@samco-norton.co.uk]
Sent: 19 January 2026 12:44
To: G. C. Rickards <info@RickardsTrucks.co.uk>
Subject: Fire Resistance Information
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Good afternoon,
We've had a question from Tony himself about lego blocks fire resistance from the quotation below.
11
Fire Resistance Information
All our lego blocks are Class A1 Fire Resistant in accordance with clause 4.3.4.4 of EN 13369.
Please let me know if you have any questions.
Kind regards,
Patricia Bury
Samco (Norton) Ltd
Windmill Lane
Norton, Nr Shifnal
Shropshire

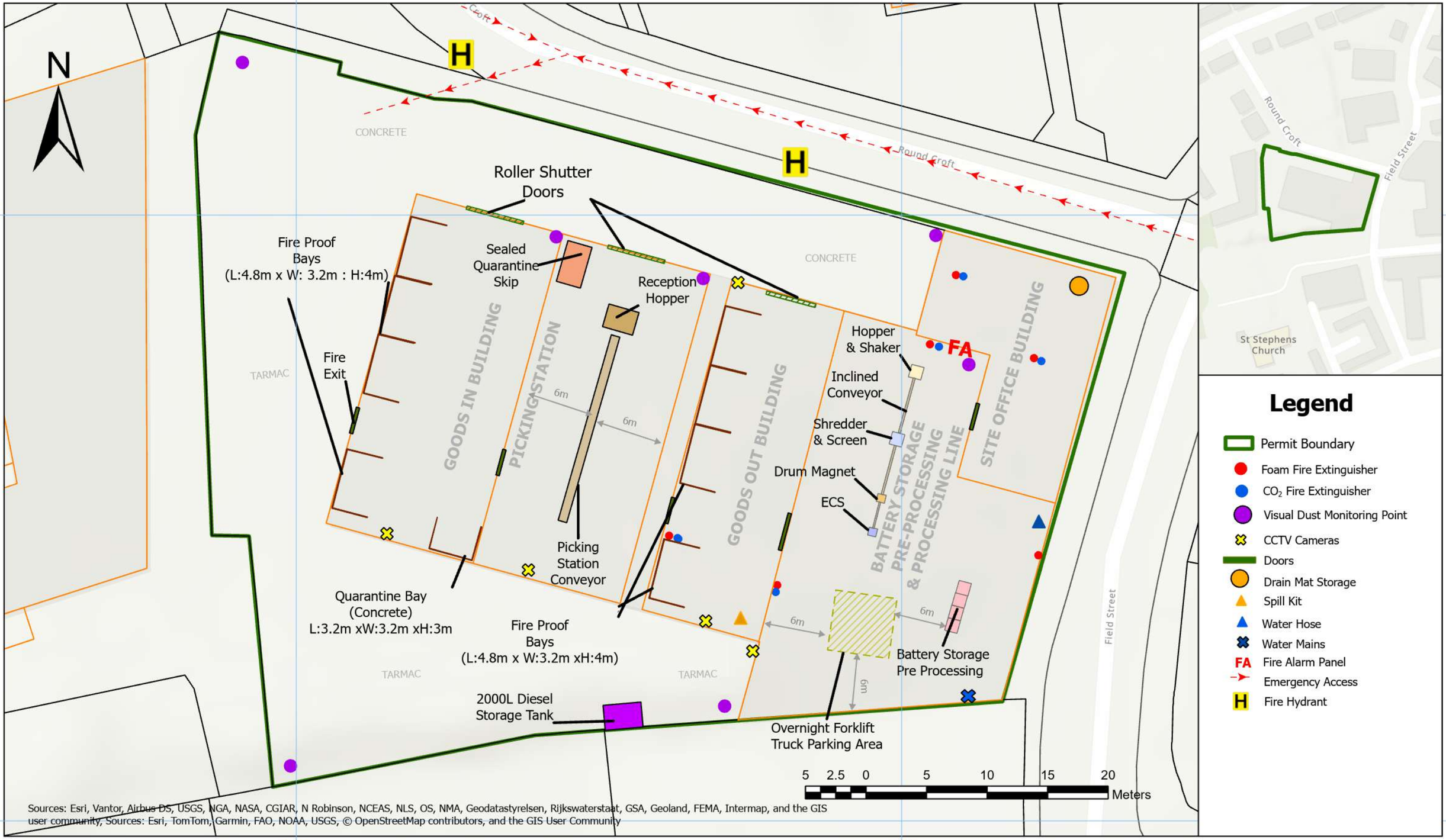


Contact information:

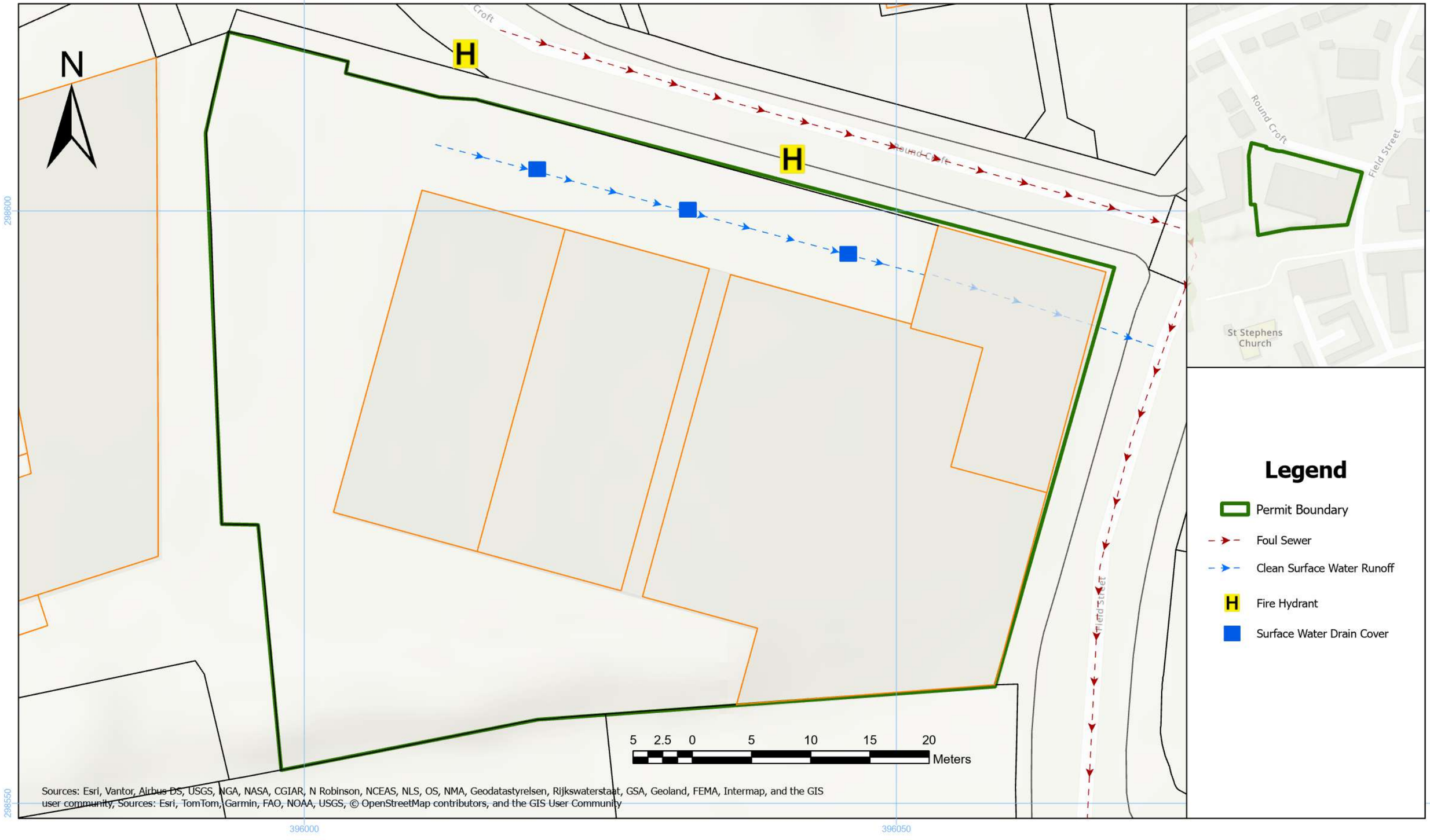
(+44 7724 344377) (+44 7376 408430)

cellsafeuk@gmail.com

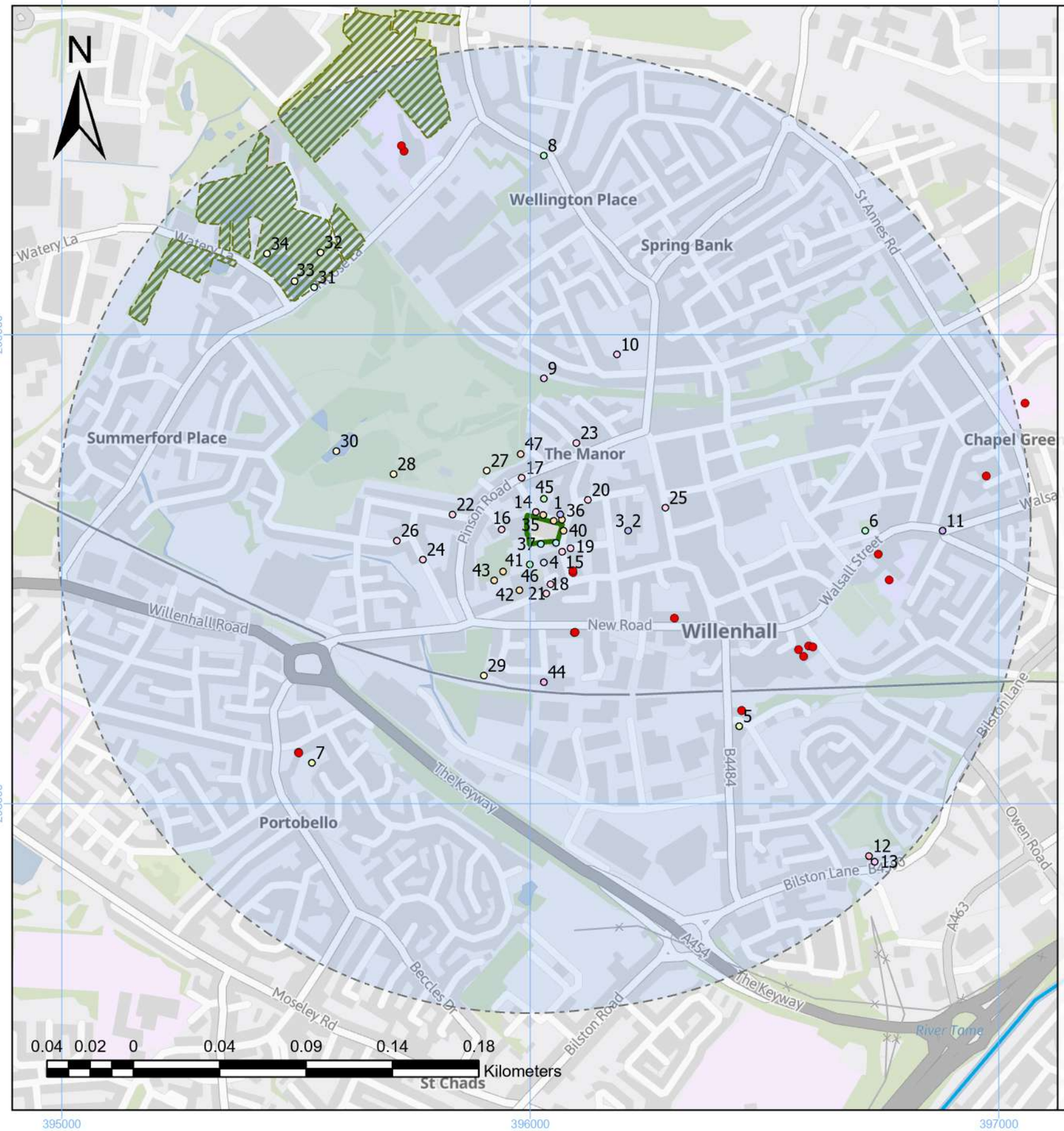
Units 1, 2 & 3 - Round Croft, Willenhall WV13 2NP



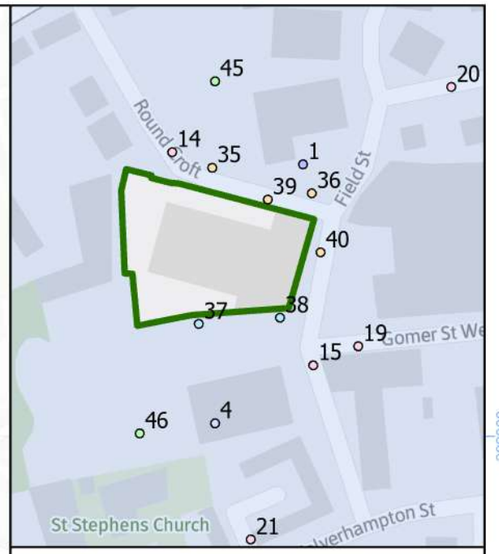
Title: Indicative Site Layout and Storage	Date: 12/02/2026	Page Size: A3	Drawing Number: CellSafeUK-SiteLayout-DW01
Site Location: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2NP	Version: FINAL	Scale: 1:300	Grid reference: SO 96033 98587



Title: Site Drainage	Date: 12/02/2026	Page Size: A3	Drawing Number: CellSafeUK-Drainage-DW02
Site Location: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2NP	Version: FINAL	Scale: 1:300	Grid reference: SO 96033 98587



ObjectID	Type of Facility	Receptor
1	Medical	Keys Doctor's Surgery
2	Medical	Croft Surgery
3	Medical	Lockfield Surgery
4	Pre-School	Tiny Talents Pre-School
5	Nursery School	ABC Day Nursery
6	School	Saint Giles Church of England Primary School
7	Nursery School	Tip Top Day Nursery
8	School	Fibbersley Park Primary Academy
9	Care Home	Inglenook Residential Homes
10	Care Home	Woodthorne Care Home
11	Retirement Home	Manor House Retirement Home
12	Learning Disabilities	Dignus Care - Ebenezer House
13	Care Home	Kingsway Care Home
14	Residential	Round Croft
15	Residential	Field Street
16	Residential	St Stephen's Avenue
17	Residential	Pinson Road
18	Residential	Wolverhampton Street
19	Residential	Gomer Street
20	Residential	Croft Street
21	Residential	Peel Close
22	Residential	Park Avenue
23	Residential	Dartmouth Avenue
24	Residential	Summer Street
25	Residential	Stafford Street
26	Residential	Aston Road
27	Priority Habitat	Woodpasture and Parkland BAP
28	Priority Habitat	Deciduous Woodland
29	Priority Habitat	Coastal and Floodplain Grazing Marsh
30	Priority Habitat	Coastal and Floodplain Grazing Marsh
31	Local Nature Reserve	Waddens Brook, Noose Lane, (Fibbersley) LNR
32	Priority Habitat	Deciduous Woodland
33	Priority Habitat	Coastal and Floodplain Grazing Marsh
34	Priority Habitat	Good quality semi-improved grassland
35	Industrial	Ivan's Autos
36	Industrial	AJ Tyre Service
37	Commercial	Gilberts Bar and Function Room
38	Commercial	Jeffreys Doors & DIY Store
39	Industrial	Bloxwich Environmental Services Ltd
40	Industrial	A & M Ductwork Ltd
41	Industrial	Beamo Ltd
42	Industrial	Willenhall Auto Service
43	Industrial	The Garage Willenhall
44	Railway	Railway Line
45	Church	Salvation Army Church
46	Church	St Stephen's Church
47	Parkland	Willenhall Memorial Park

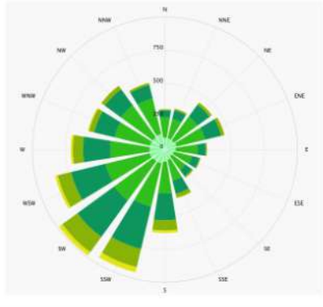


Legend

- Permit Boundary
- PermitBoundary_Buffer1
- Watercourse
- Local Nature Reserve (LNR)
- National Nature Reserves (NNR)
- Scheduled Monuments
- Sites of Special Scientific Interest (SSSI)
- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Ancient Woodland
- Schools
- Church
- Commercial
- Industrial
- Learning Disabilities
- Local Nature Reserve
- Medical
- Nursery School
- Parkland
- Pre-School
- Priority Habitat
- Railway
- Residential
- Retirement Home
- School

Type of Facility

- Care Home



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Site Location: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2NP	Version: FINAL	Scale: 1:12000	Grid reference: SO 96033 98587

Title: Site Location	Date: 15/09/2025	Page Size: A3	Drawing Number: CellSafeUK-SiteLocation-DW04
Site Location: Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands, WV13 2NP	Version: FINAL	Scale: 1:300	Grid reference: SO 96033 98587