



**Bath & North East
Somerset Council**

Improving People's Lives

Fire Prevention Plan

Bath Recycling Centre

19th December 2024

Project No.: SOL_23_P113_SRA

Document details	
Document title	Fire Prevention Plan
Document subtitle	Bath Recycling Centre
Project No.	SOL_23_P113_SRA
Date	19 th December 2024
Version	QMS_7.5.38_TEM – Template – Report Long Form – New Style (Perm) v1
Author	Rhys Morgan
Client Name	Bath and North East Somerset Council

Document history					
Version	Revision	Author	Reviewed by	Date	Comments
1 st Submission to the EA	01	Rhys Morgan	Sophie Rainey	19/12/2024	First Issue to the EA

Signature Page

19th December 2024

Fire Prevention Plan

Bath Recycling Centre



Rhys Morgan
Environmental Consultant



Sophie Rainey
Environmental Permitting Team Leader

This report has been prepared by Sol Environment with all reasonable skill, care, and diligence, and taking account of the Services and the Terms agreed between Sol Environment Ltd and the Client. This report is confidential to the client, and Sol Environment accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by Sol Environment Ltd beforehand. Any such party relies upon the report at their own risk.

Sol Environment disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the Services

CONTENTS

1.	INTRODUCTION	1
1.1	Structure of the Fire Prevention Plan	1
1.2	Status of the Fire Prevention Plan	1
2.	SITE DETAILS	2
2.1	Site Location	2
2.2	Infrastructure and Design	2
2.2.1	Site Installation Boundary.....	2
2.2.2	Site Layout and Design	2
2.2.3	Drainage.....	2
2.3	Site Context.....	6
2.3.1	Site Setting.....	6
2.3.2	Nearby Sensitive Receptors.....	6
2.3.3	Wind Direction.....	10
2.3.4	Flood Risk.....	10
3.	FIRE PREVENTION PLAN.....	12
3.1	Responsibility for Implementation of the Fire Prevention Plan	12
3.2	Control of Potential Causes of Fire	13
3.3	Preventing Self Combustion	14
3.3.1	Managing Storage Time.....	14
3.3.2	Monitor and Control Temperature	14
3.3.3	Waste Bale Storage	14
3.4	Manage Waste Piles	14
3.4.1	Maximum Pile Sizes	14
3.5	Prevent Fire Spreading	15
3.5.1	Separation Distances	15
3.5.2	Fire Wall and Bays	15
3.5.3	Quarantine Area	16
3.6	Detecting Fires	16
3.7	Suppressing Fires	16
3.8	Firefighting Techniques	17
3.9	Fire Evacuation	18
3.10	Water Supplies.....	18
3.11	Managing Fire Water	19
3.12	During and After a Firefighting Incident.....	19
3.12.1	During an Incident	19
3.12.2	After an Incident.....	20

List of Tables

Table 2-1 – Surrounding Site Setting	6
Table 2-2 – Designated Sites with 2km of the Site	8
Table 3-1 – Control of Potential Sources of Fire	13
Table 3-2 – Fire Water Supplies.....	18
Table 3-3 – Water Supply Calculations.....	19

List of Figures

Figure 2.1 - Site Location Plan	3
Figure 2.2 – Proposed Site Layout	4
Figure 2.3 - Site Drainage Plan.....	5

Figure 2.4 - Sensitive Human Receptors..... 7
Figure 2.5 – Sensitive Ecological Receptors within 2km of the Site..... 9
Figure 2.6 – Wind Rose for former RAF Colerne 10
Figure 2.7 – Flood Risk of the Proposed Site..... 11
Figure 3.1 - Fire Prevention Plan Drawing..... 22
Figure 3.2 - Site Boundary 23
Figure 3.3 - Additional Water Supplies..... 24

Acronyms and Abbreviations

Name	Description
B&NES	Bath and North East Somerset Council
FPP	Fire Prevention Plan
FRS	Fire and Rescue Service
RC	Recycling Centre

1. INTRODUCTION

This document has been prepared by Sol Environment Ltd on the behalf of Bath and North East Somerset Council (“B&NES” hereafter) for the operation of a recycling centre on Locksbrook Road, Bath BA1 3EL.

The document provides a structured framework approach in effectively preventing potential fires associated with the processing and storage operations at the site.

This Fire Prevention Plan document (referred hereafter as the ‘FPP’) has been produced in accordance with the Environment Agency’s Fire Prevention Plans: Environmental Permits guidance, updated 11th January 2021.

This FPP has been produced as part of a permit variation to repurpose the former Bath Street Cleansing Depot facility into a local community refuse recycling centre under the existing permit number EPR/PB3401MM.

This Fire Prevention Plan meets the fundamental objective of the FPP Guidance as it demonstrates that the site can:

- Minimise the likelihood of a fire happening;
- Aim for fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

1.1 Structure of the Fire Prevention Plan

This FPP has been structured in accordance with the EA Fire Prevention Plan Guidance and considers the following relevant aspects of the facility:

- Managing Common Causes of Fire;
- Preventing Self Combustion;
- Managing Waste Piles;
- Preventing Fire Spreading;
- Quarantine Area;
- Detecting Fires;
- Suppressing Fires;
- Firefighting Techniques;
- Water Supplies;
- Managing Fire Water; and
- During and after an Incident.

1.2 Status of the Fire Prevention Plan

The FPP is a “live” document and will form part of the key environmental management document for the facility. All monitoring procedures, responsibilities and compliance actions will be updated as and when required.

2. SITE DETAILS

2.1 Site Location

The site is located at the former Bath Street Cleansing Depot on Locksbrook Road, Bath, BA1 3EL.

The site location plan is shown in **Figure 2.21**.

2.2 Infrastructure and Design

2.2.1 *Site Installation Boundary*

The proposed installation boundary of the site can be seen in **Appendix A**.

2.2.2 *Site Layout and Design*

The proposed site area covers approximately 0.26ha and consists of a mixture of visitor car parking and designated waste storage areas. The site layout plan can be seen below in **Figure 2.2**.

2.2.3 *Drainage*

The site utilises a sealed drainage system that covers both operational and non-operational areas of the site.

The proposed drainage system splits the site into three distinct catchments:

- Catchment A incorporates the western portion of the site where there will be clean runoff areas. Rainwater within these areas will be collected by new drainage channels which will discharge into the existing surface water sewer underneath Locksbrook Road to the north of the site.
- Catchment B incorporates the western portion of the site where street cleaning vehicles will be cleaned and black sack tipping and weeding waste bays are located. The runoff within this catchment area may be contaminated and will be collected by foul gullies and discharged to the foul water sewer beneath Locksbrook Road.
- Catchment C is the eastern half of the site where surface water will be collected by new rainwater gullies and permeable paving systems before discharging eastwards. The final point of discharge for the proposed surface water system will be to the existing Wessex Water sewer to the east of the development. The sewer lies in land owned by B&NES.

Runoff from site will be intercepted by 2 interceptors on site, one for foul and one for surface water. In the event of a fire, a penstock valve can be operated to isolate the drainage system and prevent potentially contaminated firewater from leaving the site. A copy of the drainage plan can be found below In **Figure 2.3**.

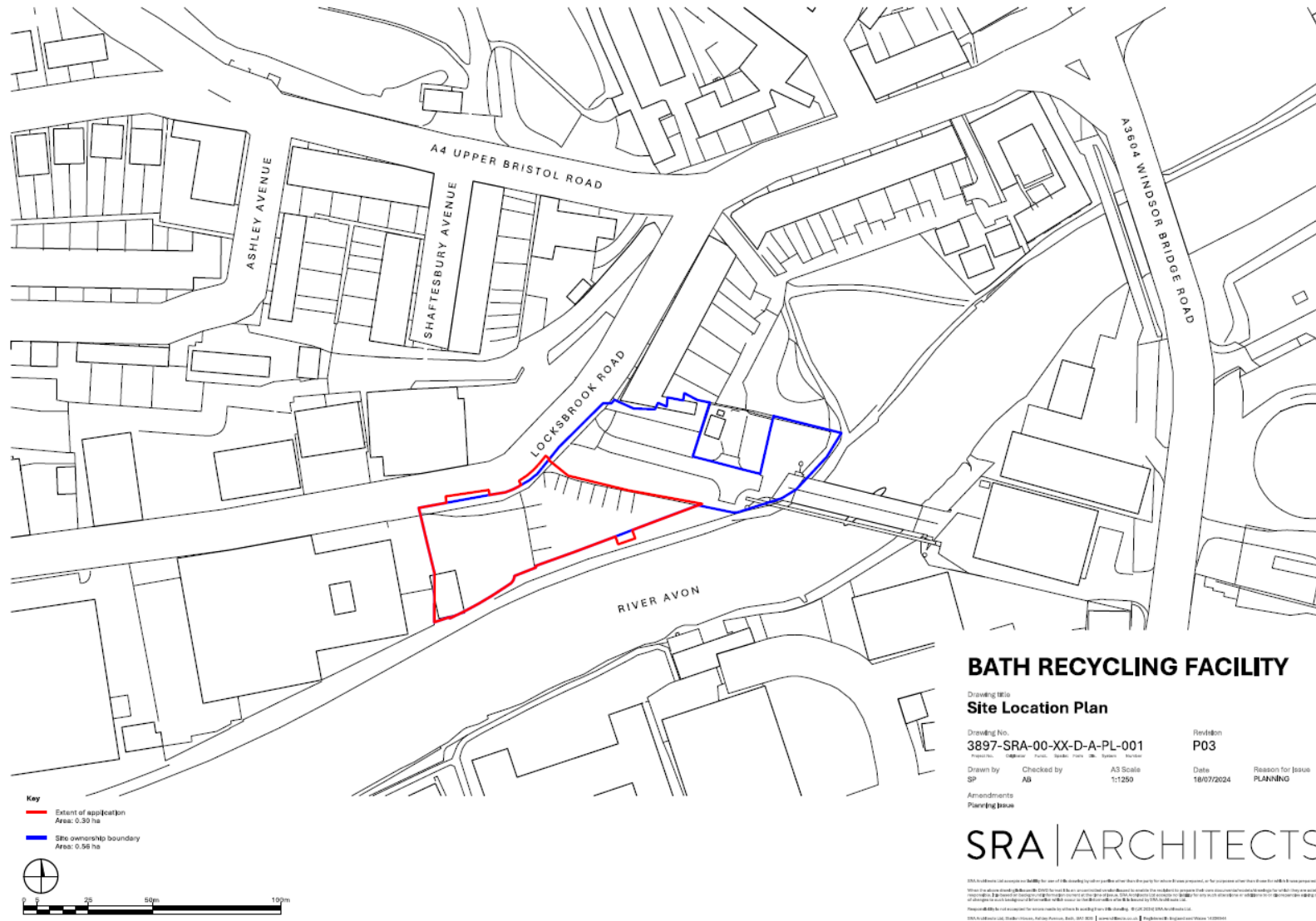


Figure 2.1 - Site Location Plan



Figure 2.2 – Proposed Site Layout

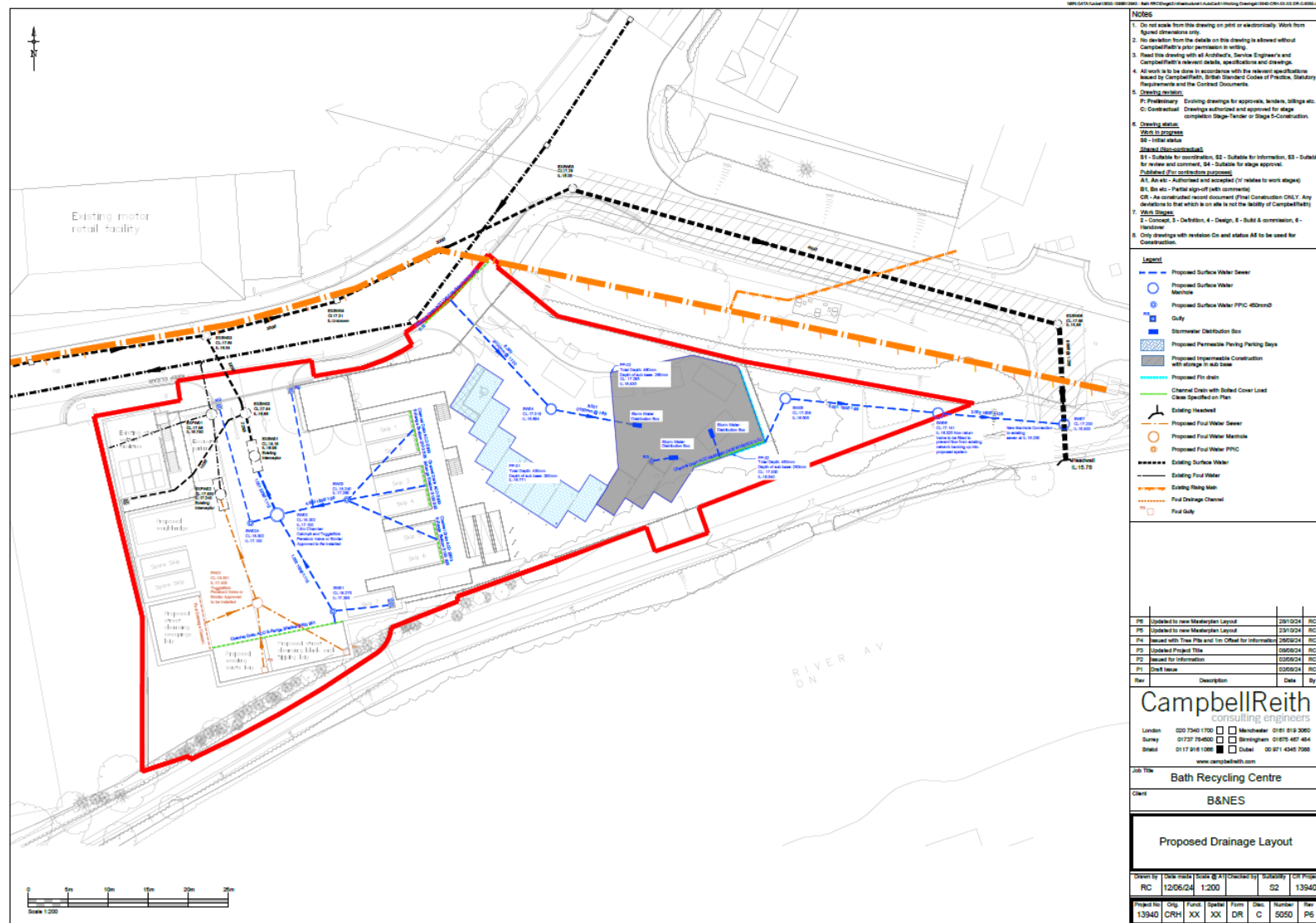


Figure 2.3 - Site Drainage Plan

2.3 Site Context

The following sections outline the site context, including the proposed boundary and layout, surrounding site setting and any nearby sensitive receptors

2.3.1 Site Setting

The site is located in a mixed-use landscape, comprising of a blend of commercial, residential and recreational assets, as well as prominent ecological features. **Table 2-1** outlines the surrounding site setting in greater detail, including features in the immediate vicinity, within 500m and beyond 500m of the proposed site.

Table 2-1 – Surrounding Site Setting

Direction	Description
North	Immediate Vicinity: Locksbrook Road, Bath Volkswagen Within 500m: Residential areas (closest being Shaftesbury Ave) Offices and Local Businesses (e.g. SRA Architects, Bath Electrical Solutions), Locksbrook Cemetery Beyond 500m: Residential areas (closest being Audley Close)
East	Immediate Vicinity: Car Parking, Residential Housing (Locksbrook Road) Within 500m: Kelson’s Field/Playground, River Avon, Commercial Units including PureGym Bath and Bath Auto Service, The Brook Student Accommodation, EON Bath Energy Centre Beyond 500m: Riverside Park, Residential Apartments (Frederick House, Leopold House)
South	Immediate Vicinity: Bristol and Bath Railway Path, River Avon Within 500m: Unite Students Accommodation, Mocca Cleaning Services, A36, Residential areas (closest being Vernon Park), Twerton Cemetery, Oldfield Park Railway Station, Railway Line, Linear Park Beyond 500m: Bricksfield Park, Dartmouth Avenue University of Bath, Residential housing (closest being Ringwood Rd), Local amenities
West	Immediate Vicinity: Locksbrook Road, Horstman Defence Systems Within 500m: Bath Spa University Locksbrook Campus, Bath Veterinary Group, Halfords Auto Centre, Weston Cut Canal, Bristol and Bath Railway Path, Residential Housing, Kenneth Copeland Ministries, Commercial properties Beyond 500m: Residential housing (closest being Locksbrook Road), Locksbrook Inn, Weston Cut Canal, Commercial units

2.3.2 Nearby Sensitive Receptors

The nearest residential areas to the site are on Locksbrook Road, located approximately 40m northeast of the site boundary.

Due to the proximity of the nearest residents, the site could be considered to be moderately sensitive in relation to fire risk.

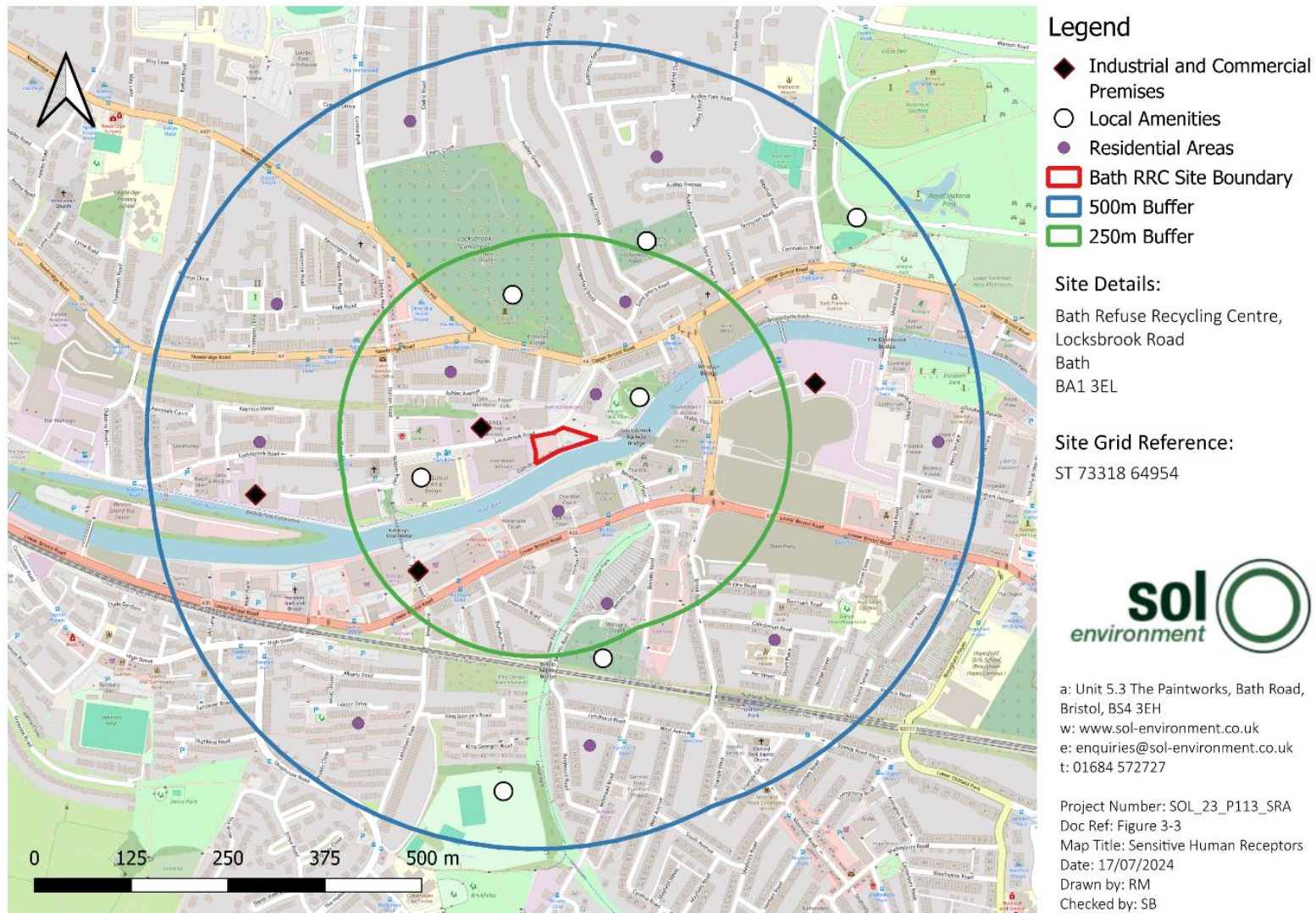


Figure 2.4 - Sensitive Human Receptors

The nearest ecological receptor to the site is Carrs Woodland Local Nature Reserve (LNR), located approximately 930m west of the site.

Table 2-2 – Designated Sites with 2km of the Site

Designated Site	Designation Status	Distance from Site
Cotswolds	AONB	1390m northwest
Carrs Woodland	LNR	930m west
Twerton Roundhill	LNR	1670m southwest
Newton St. Loe	SSSI	1930m northwest

Please refer to **Figure 2.5** below which shows the locations of nearest designated ecological receptors. The red line boundary at the centre of the buffer denotes the site boundary. The LNRs and SSSIs are labelled, and the Cotswolds AONB resides within the red dotted area to the north of the site.

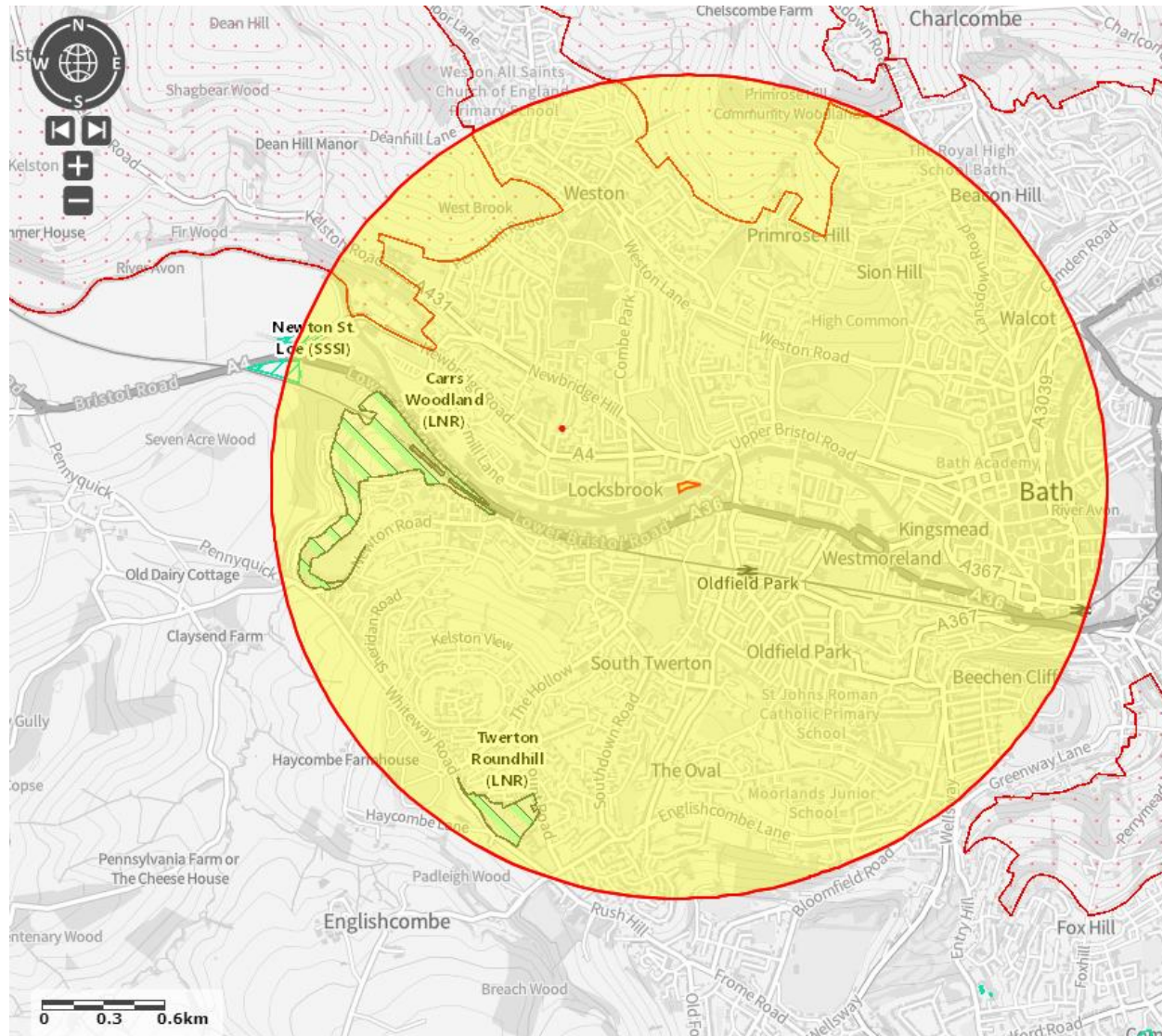


Figure 2.5 – Sensitive Ecological Receptors within 2km of the Site.

2.3.3 Wind Direction

The estimated wind direction for the proposed site comes from a predominantly westerly direction, based on historic wind direction recordings taken from the former RAF Colerne airfield located 9.13 km northeast of the site.

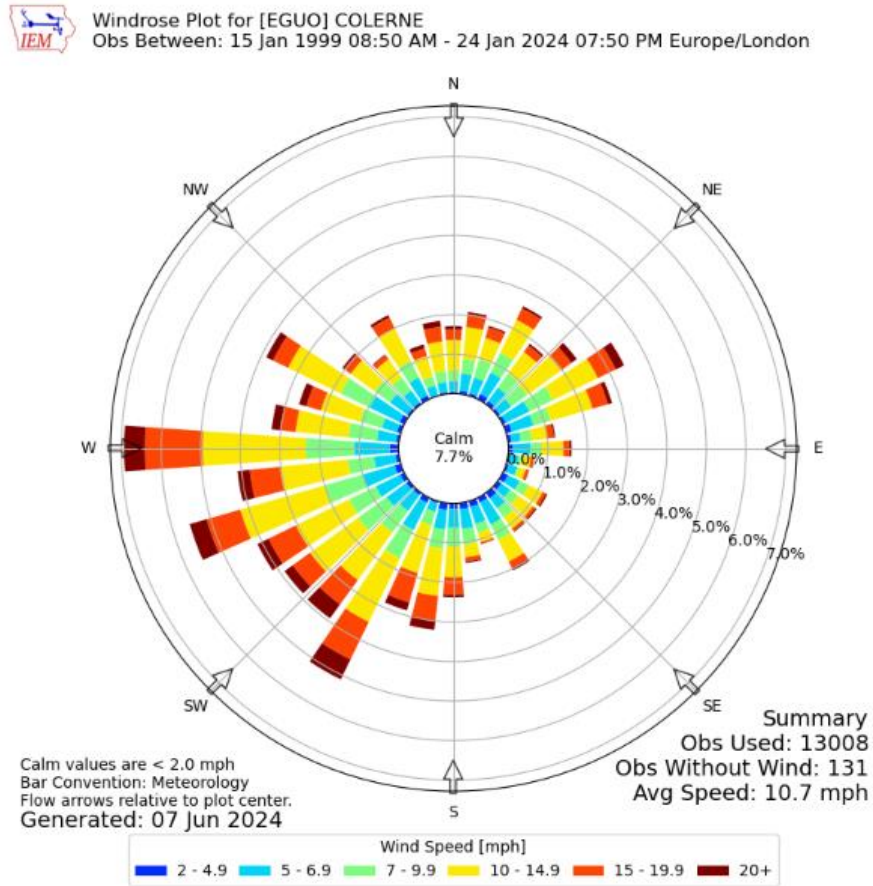
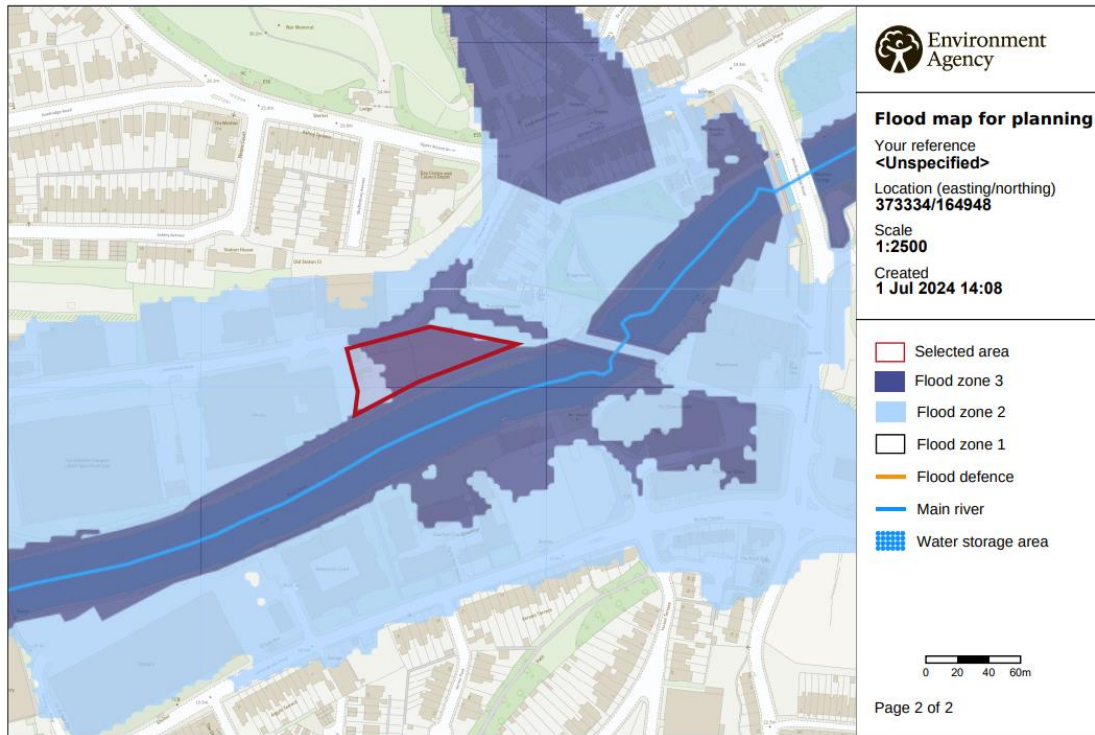


Figure 2.6 – Wind Rose for former RAF Colerne

2.3.4 Flood Risk

The site is located within flood zone 3, meaning there is a high probability of flooding from the nearby River Avon. The extent of flooding from rivers is shown in **Figure 2.7** below.



© Environment Agency copyright and / or database rights 2022. All rights reserved. © Crown Copyright and database right 2022. Ordnance Survey licence number 100024198.

Figure 2.7 – Flood Risk of the Proposed Site

3. FIRE PREVENTION PLAN

This Fire Prevention Plan has been developed to include an assessment of fire risk on site and the measures in place to prevent, detect, suppress, mitigate and contain fires.

This plan forms part of B&NES's management system and sets out the fire prevention measures and procedures that will be put in place and used on site.

All staff and contractors working on site will understand the contents of the Fire Prevention Plan and what they must do during a fire.

The Fire Prevention Plan will be kept in the Site Office and all staff will be aware of where it is kept.

Regular exercises will be carried out to test how well the plan works and that staff understand what to do. These exercises will take place every quarter.

Please note, due to the nature of the wastes stored on site, self-combustion is considered extremely unlikely due to the minimal times waste will be stored on site.

In accordance with the Guidance, B&NES store the following potentially combustible waste materials:

- Residual, mixed household waste and black bag waste;
- Cardboard (including items too large for kerbside collection);
- Soft furnishings;
- Bulky Waste;
- Garden and weeding waste;
- Street Cleansing Waste;
- Wood;
- Scrap metal; and
- Large electrical items (excluding fridges, freezers, TVs and monitors).

Due to the site serving as a local recycling hub for the surrounding community, a large variety of household waste (including construction waste) will be accepted on site. However, waste will be segregated as best as possible into its waste type and stored in large skips or containers during its lifetime on site.

All wastes collected from the public will be stored in 40-yard containers, accessed by an overhead gantry on site, and all wastes collected by council-operated vehicles will be stored in bays in an area of site that is non-accessible to the public.

3.1 Responsibility for Implementation of the Fire Prevention Plan

The primary responsibility for implementing the Fire Prevention Plan lies with the Site Operations Manager, as appointed by B&NES and in conjunction with the Councils Health, Safety and Wellbeing Business Partner. The Site Operations Manager will be suitably trained in fire and fire prevention and hold a full working knowledge of this FPP.

The Site Operations Manager is responsible for ensuring that all staff and site operatives working on site are trained in the FPP and know the measures/actions to be undertaken should a fire event occur on site.

3.2 Control of Potential Causes of Fire

The following table identifies common causes of fire and the measures that B&NES take to reduce the risk.

Table 3-1 – Control of Potential Sources of Fire

Potential Source of Fire	Proposed Management Control	Residual Risk
Arson	Security fencing, locked gates and 24/7 monitored CCTV in operation to prevent unauthorised access and deliberate arson incidents.	Low
Plant and Equipment	There will be limited plant and equipment used on site, but all plant and equipment used will be regularly inspected and maintained to reduce risk of fire.	Low
Electrical faults including damaged or exposed electrical cables	Ongoing inspections, maintenance and, if required, repairs of all electrical points on site. This includes the Electric Vehicle (EV) charging points located in the car parking.	Low
Discarded Smoking Materials	There is a strict no smoking policy in areas of waste storage. There will be a single designated smoking area for staff located adjacent to the building.	Low
Hot Works	No permanent hot works will be undertaken on site. Ad-hoc hot works may be undertaken for repair and maintenance purposes, however These will be undertaken with maximal distance between the works and any stored waste.	Low
Industrial Heaters	Not applicable – no industrial heaters to be used on site.	None
Hot Exhausts	Hot exhausts on site will not come into contact with waste. Vehicles are parked in designated parking bays and waste is carried by hand to the designated deposit container. Council-owned vehicles will be parked up at least 30 minutes before the end of the day, and monitored for any signs of trapped debris or waste that may ignite.	Low
Ignition Sources	Not applicable – no permanent ignition sources to be used on site.	None
Batteries	Batteries are not readily accepted on site. Spot-checks will be undertaken throughout the day to look for non-accepted wastes, including batteries. If detected, all batteries will be removed to the lockable unit for quarantine before removal off site.	Low
Leaks and Spillages	Staff will be appropriately trained in managing accidental spills and leaks that may arise on site. Spill kits will be strategically located around the site to allow for the timely cleaning of any leaks or spills that may occur.	Low
Build-up of loose combustible waste	Most of the waste will be stored in containers, with the remaining waste stored in designated bays. Waste will be stored for a minimal amount of time and removed offsite as soon as possible.	Low
Reactions between wastes	There are no reactions between wastes expected. Spot checks will be undertaken periodically to remove any waste (e.g. batteries,	Low

	chemicals) that have been unknowingly deposited on site.	
Waste acceptance and deposited hot loads	Not applicable – no hot loads are accepted on site.	None
Hot and dry weather	Hot and dry weather can give rise to fire. Storage time will be kept to a minimum, with regular checks and inspections being undertaken to look for signs of fire. CCTV will monitor the site during out-of-hours.	Low

3.3 Preventing Self Combustion

The primary self-combustion prevention measure used on site relates the management of storage time. Wastes with longer storage times have a proportionately greater risk of self-combustion than waste stored for minimal times. Details of storage times have been outlined below.

3.3.1 Managing Storage Time

B&NES propose to operate in such a manner as to maintain waste piles as low in size as possible. Given the community nature of this waste transfer station, it is within the best interest of B&NES to remove waste offsite as fast as possible to allow provisions of waste storage to continue smoothly for local residents, as well as minimising the risk of dust, odour and fire that increase with longer storage times.

The site operates with the aim of removing waste from site within 24-48 hours with a maximum of 72 hours for combustible wastes allowed for unexpected delays or bank holiday weekends, where collection services are limited. There may be storage times up to a maximum of one week for non-combustible waste such as metal waste.

Electronic records of outgoing waste quantities, as well as waste type, time of arrival of empty container and time of departure of full container are recorded by the weighbridge operator for all wastes being transferred offsite. Details recorded allow the site to accurately track waste storage time and allow for accurate and appropriate measures to be undertaken to manage the storage time of waste.

3.3.2 Monitor and Control Temperature

Given that waste will be stored for a very short time, and this time will be for less than 3 months, no temperature monitoring or control has been proposed.

3.3.3 Waste Bale Storage

There will be no waste bale storage undertaken on site.

There are no procedures in place for the storage of waste bales.

3.4 Manage Waste Piles

3.4.1 Maximum Pile Sizes

Most waste stored on site will be stored in the seven 40-yard containers on site. These containers will hold the following wastes:

- Residual household waste;

- Cardboard (including items too large for kerbside collection);
- Soft furnishings;
- Bulky Waste;
- Garden Waste;
- Wood; and
- Scrap metal and large electrical items, not including fridges, freezers, TVs or computer monitors.

The remaining waste stored on site will include street cleansing black bags, weeding waste and street cleansing sweepings. The bays sizes for each of these wastes are as follows:

- Black bag bay – 9.9m L x 4.2m W x 2.0m H = 83.16m³;
- Weeding Waste bay – 6.2m L x 4.2m W x 2.0m H = 52.08m³; and
- Street cleansing sweepings bay – 7.0m L x 6.6m W x 2.0m H = 92.40m³.

3.5 Prevent Fire Spreading

The site operates several measures to prevent fire spreading. These measures are described in the sections below.

3.5.1 Separation Distances

Most waste will be stored in large fire-retardant containers, the walls of which act as a fire break in the event of a fire. Therefore, the 6m separation distances stipulated within the FPP Guidance are not considered relevant at this site.

For waste stored in bays, bays will be constructed of fire-resistant concrete designed to withstand the effects of heat and fire and negating the need for separation distances between bays. Furthermore, a freeboard allowance will be maintained at 1m below the height of the bay walls. This will prevent fire “jumping” to adjacent bays in the unlikely event that fire should occur.

All vehicles will be parked in a designated parking area within the site’s boundary. The location of this can be found in **Appendix A** at the end of this document.

3.5.2 Fire Wall and Bays

The majority of waste is to be stored in 40-yard metal containers as shown in **Figure 2.2**, so no fire walls or bays will be used in the storage of waste within any of these containers. All open bays storing waste will be constructed to be 3 meters tall inclusive of a 1m “freeboard” allowance as detailed in section 3.5.1. This will remain clear at all times to prevent the potential spread of fire over the top of the container. Maintaining the freeboard allowance will also minimise the potential of dust and litter escaping to the environment. Regular site inspections will ensure that the freeboard space is maintained at all times.

Other wastes will be stored elsewhere on site namely street cleaning sweepings, weeding waste, and street cleansing black sack tipping. These waste types will be stored in concrete, fire-resistant bays.

All bays will be constructed to be 3 meters tall, which is inclusive of the 1m freeboard allowance as detailed in **Section 3.5.1**.

3.5.3 Quarantine Area

The site will not operate a designated quarantine area. Instead, given the segregated waste storage areas, if in the highly unlikely event a fire should occur, burning waste will be quarantined within its storage area.

The operational area of the site is small, and moving burning waste around will likely increase the risk of fire spreading to other waste storage areas. All storage areas are fire resistant, either through the metal container walls or fire-resistant concrete bay walls so fire is unlikely to spread between waste areas.

If fire were to occur in any of the waste containers, then the container will be pulled out from its designated space and positioned in the centre of the operational area. This is to minimise the likelihood of heat transferring between containers and igniting waste in adjacent units. Placing the container in the centre of the operational area will also allow for 360° access by the Fire and Rescue Service (FRS).

If fire were to occur in any of the bays, the freeboard allowance set on the bays will ensure fire has a reduced likelihood of spreading to adjacent bays. The concrete, fire resistant walls used in the bay's construction will also prevent fire spread.

There will be available fire hoses on site, used in the wash area, that can be used to suppress a fire outbreak until the FRS arrive, or dampen surrounding stockpiles to reduce risk of fire spread. The fire hoses will be unlikely to suppress a major fire, but nevertheless forms part of the site's firefighting strategy.

3.6 Detecting Fires

Given the low-risk nature of the site, as a result of short storage times and limited storage capacity at any given point, a manual detection system will be in operation for the site.

During operational hours, visual detection by trained and vigilant site staff will serve as the primary means for detecting a fire at the earliest opportunity. Staff will ensure that no hot loads are deposited on site by members of the public and that site rules are upheld to prevent accidental combustion of waste. Site staff will also periodically inspect waste piles for signs of early fire, such as smouldering, smoke or heat detectable by the skin.

During out-of-hours, CCTV operators will periodically monitor the site for signs of fire. CCTV on site is linked to B&NES Council Security Hub, which benefits from 24/7 surveillance.

3.7 Suppressing Fires

Given the relatively low risk of fire, the site does not operate any automatic fire suppression but instead has chosen to operate several layers of manual systems should fire be detected by the methods and procedures outlined in **Section 3.6**.

The site will operate a series of fire extinguishers and hoses, as well as being in close proximity to fire hydrants for use by the FRS. Fire extinguishers used on site will conform to appropriate third-party certification requirements and British Standard requirements and will be inspected annually to ensure they remain functional in the event of a fire.

There are a total of 3 fire extinguishers in the permitted area, located at strategic locations to enable fast and efficient operation if required. Additionally, there is 1 hose pipe point located on site at the wash area, as designated in the site layout plan in **Figure 2.2**. The hose point will unlikely be sufficient in suppressing

large fires given its limited flow rate, however, this additional water source will be beneficial for dampening surrounding waste to prevent fires spreading.

Dampening of waste by fire suppression will only be carried out by site staff if it is safe to do so, as deemed by the site operations manager.

There are two fire hydrants that are located in close proximity to the site on Locksbrook Road that can provide an unlimited supply of water. The closest fire hydrant is located on site, as denoted on the site map provided in **Appendix A**. In the event of a fire on site, this will be the main water source accessed by the FRS. **Appendix A** also contains the location of additional water supplies identified in this FPP.

The fire suppression measures described are proportionate to the scale of the operation.

All fire suppression equipment will be inspected and maintained in accordance to the manufacturers or third-party certification requirements.

3.8 Firefighting Techniques

The site has been designed to allow active firefighting, in line with the FPP Guidance.

Upon identifying or being made aware of a fire, the site operations manager will raise the alarm, alert all present on site to the fire and its location and alert emergency services. Any members of the public will be evacuated from the site immediately, either in their own vehicles or on foot, depending on the scale of the fire and the urgency required to evacuate,

The site evacuation will be conducted and controlled by trained site staff.

The site will be evacuated in accordance with the site's evacuation plan outlined in **Section 3.9** below.

Staff will only tackle the fire using the fire extinguishers and onsite hose point if:

- It is safe to do so;
- The fire service has been notified;
- The fire is small and not spreading to other areas;
- Escaping the area is possible by backing up to the nearest exit; and
- The fire extinguisher is in working condition and personnel are trained to use it.

In the event of a small fire:

- Staff will stop all activities immediately;
- Notify the site operations manager;;
- Suppress the fire with onsite manual measures and dampen surrounding waste piles if required; and
- The fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.

In the event of a larger fire, staff are to await the FRS, who would then take the appropriate actions.

All personnel working on site will be provided training in the Fire Prevention Plan and all associated procedures and controls. A training record shall be maintained digitally through the B&NES internal system.

FPP training will be provided to all new starters and temporary employees working at the site to ensure the highest health and safety standards are upheld.

FPP refresher training will be carried out to all personnel at least annually.

3.9 Fire Evacuation

The two exits are located at the main gates to the site and are clearly signposted. The evacuation point is located across the road out of the Volkswagen dealership

Site rules and procedures are reinforced via use of fire drills and planned response scenarios.

All personnel are to follow the instructions of the site Fire Wardens and the Site Operations Manager. A trained Fire Warden will be working on site at all times during operational hours.

A list of trained Fire Wardens is maintained and displayed in the site office, together with a list of on-call staff to attend the site in the event of a fire outside of normal operation hours.

The Fire Evacuation Procedure is provided to staff and contractors which states:

- On discovery of a fire, immediately make the presence of fire known to all on site and contact the Site Operations Manager;
- Fire Wardens and staff must only tackle to fire if they are trained to do so, the equipment is appropriate and if their own safety or that of others is not compromised;
- Leave the site by the nearest available exit/safe route and report directly to the assembly point located outside of the Volkswagen dealership;
- Leave quickly but in a calm, controlled and orderly manner. Do not detour to collect personal items;
- Do not re-enter the site for any reason until authorisation has been given by the Site Operations Manager/Fire Warden;
- The Site Operations Manager will assess the situation and call the FRS if required; and
- Visitors to the site will be instructed by trained site staff in the safe evacuation of the site. Where possible, all visitors will leave in their personal vehicles providing it is safe and practical to do so.

This document is reviewed and updated annually, or sooner if required. The document details all hazards and the control measures that are in place and / or required to prevent fires.

3.10 Water Supplies

The table below provides a summary of the site's firefighting water supplies:

Table 3-2 – Fire Water Supplies

Description	Supply Volume	Location
Fire Hydrant 125 mains	1200l/min	Onsite
Fire Hydrant 125 mains	1200l/min	90m northeast of the site on Locksbrook Road, outside 12 Locksbrook Road.

River Avon Unknown 10m south of the site

Industrial mains supply water is available from two fire hydrants, the closest of which is located on site.

The FRS service, should it be required, may also have access to the River Avon through the southern gated exit on site. The volume of water available vastly exceeds the requirement of the site, however the supply rate is dependent on the specification of the FRS' water pump. This water supply option, whilst unlikely to be utilised, may provide an additional layer of water supply should the fire hydrant on Locksbrook Road become damage or degraded.

The site also operates a washdown station, which whilst may not supply a significant volume of water, can offer immediate suppression potential in event of a small fire or be used to dampen surrounding waste to prevent fire spreading.

There are no access restrictions to any of the waste storage bays on site.

In accordance with the EA guidance the site would need a water supply of 110,880 litres and an available flow rate of 616 litres per minute as shown by the calculation in the table below.

Table 3-3 – Water Supply Calculations

Maximum pile size	Water Supply Rate (l/min)	Overall water volume required over 3 hours (l)	Total water volume available for site over 3 hours (l)
92.4m ³	616l	110,880	216,000 minimum

3.11 Managing Fire Water

In the event of a fire, contaminated water will be generated that may pose a risk if it escapes from site into the surrounding area.

Based on calculations from the EA's FPP guidance as shown in **Table 3-3**, the site will be required to contain 110.88m³ of contaminated firewater at any given point, should water be required to extinguish a fire on site.

Firewater will be contained using a 700mm concrete wall that serves both as an acoustic barrier and retaining wall to contain firewater. A series of sandbags will be deployed on site to create a temporary surface lagoon to contain the full quantity of 110.88m³, as informed by modelling undertaken by Campbell Reith.

In the event of a fire, a penstock valve will be operated to close the drainage system prior to any water being used. Any water that enters the drainage system will be pumped out and removed off site prior to the penstock valve being opened.

3.12 During and After a Firefighting Incident

The following sections describe the measures taken by the site during and after a firefighting incident

3.12.1 During an Incident

During any firefighting or subsequent clear up operations, any incoming wastes will be diverted to an alternative waste processing site.

All nearby residents, businesses and the Environment Agency will be notified during any firefighting taking place on site. Relevant telephone numbers are stored on site.

3.12.2 After an Incident

The site will be thoroughly cleaned after an incident. Any charred / partially combusted / combustion products will be disposed of an appropriate facility. It is anticipated that the clearing of combusted material will not take long, as the company are confident that any fires will be appropriately controlled and therefore will not result in significant volumes of burnt waste.

All fire water will be captured by the drainage system and transferred off site via tanker and appropriately disposed of.

All equipment will be checked for any fire damage. In the event that any equipment has been damaged, it will be removed from site and fixed / replaced as soon as possible.

This ensures that the impact to the community, infrastructure and the environment is minimal.

APPENDIX A SITE PLANS AND DRAWINGS

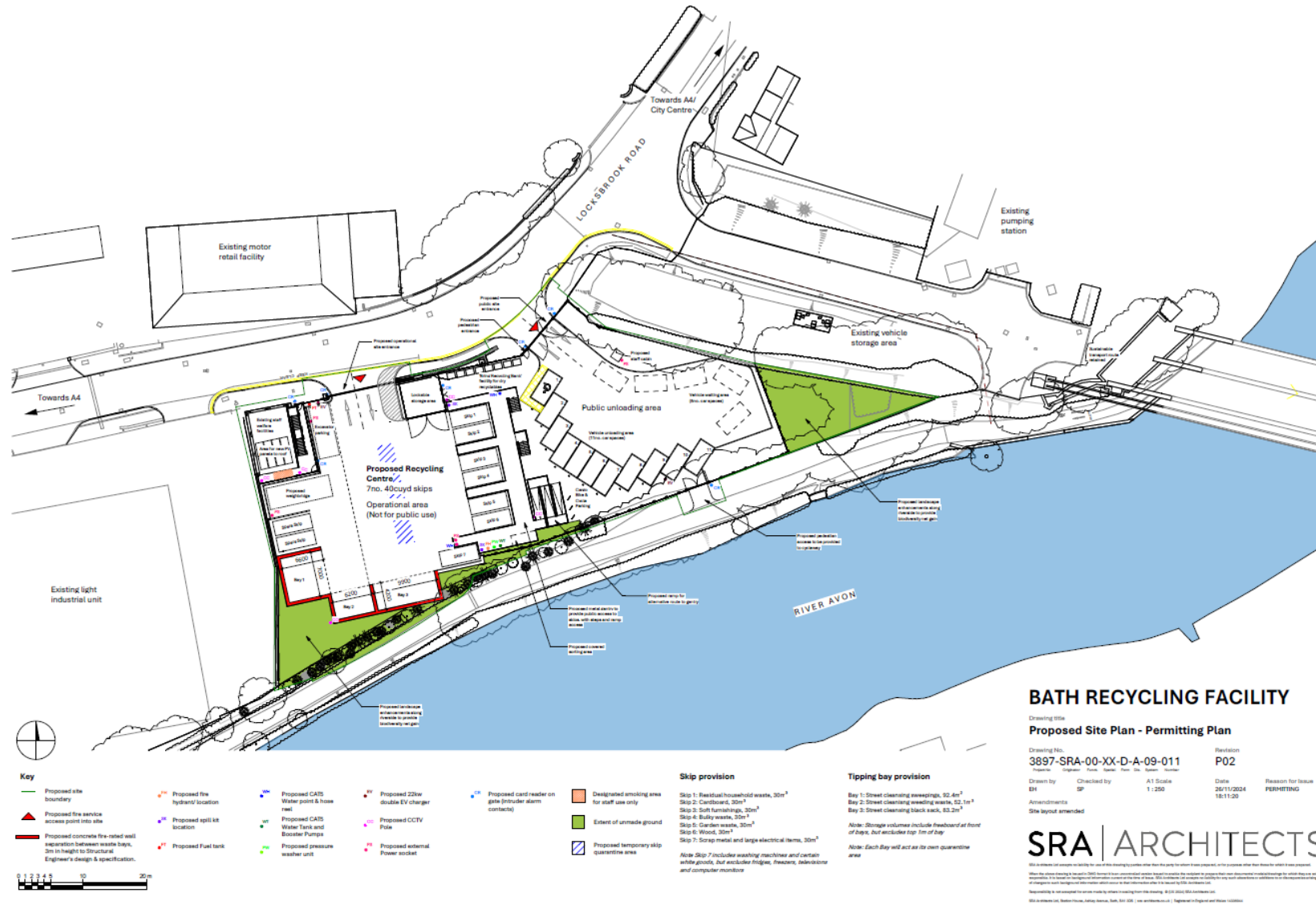


Figure 3.1 - Fire Prevention Plan Drawing

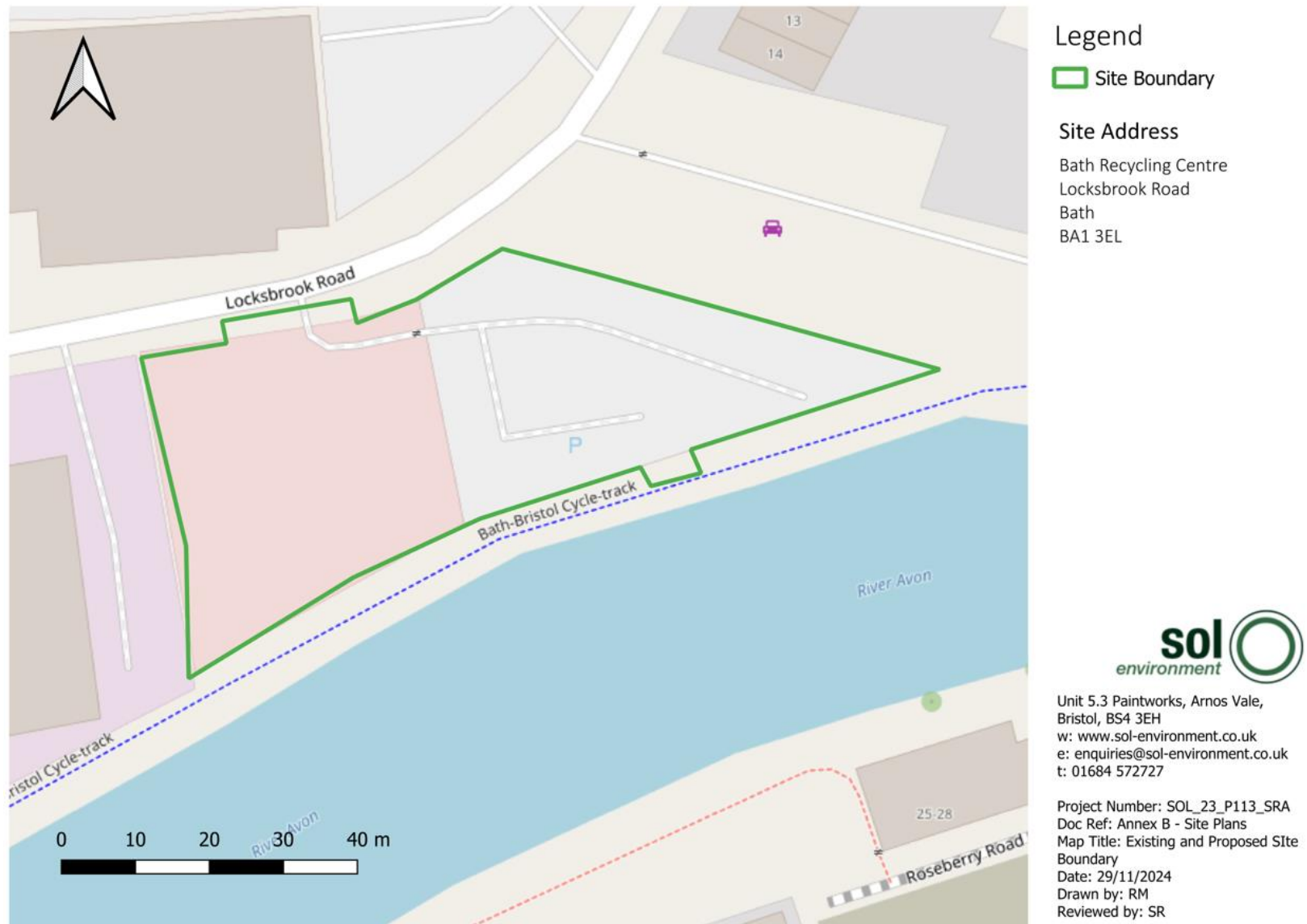


Figure 3.2 - Site Boundary

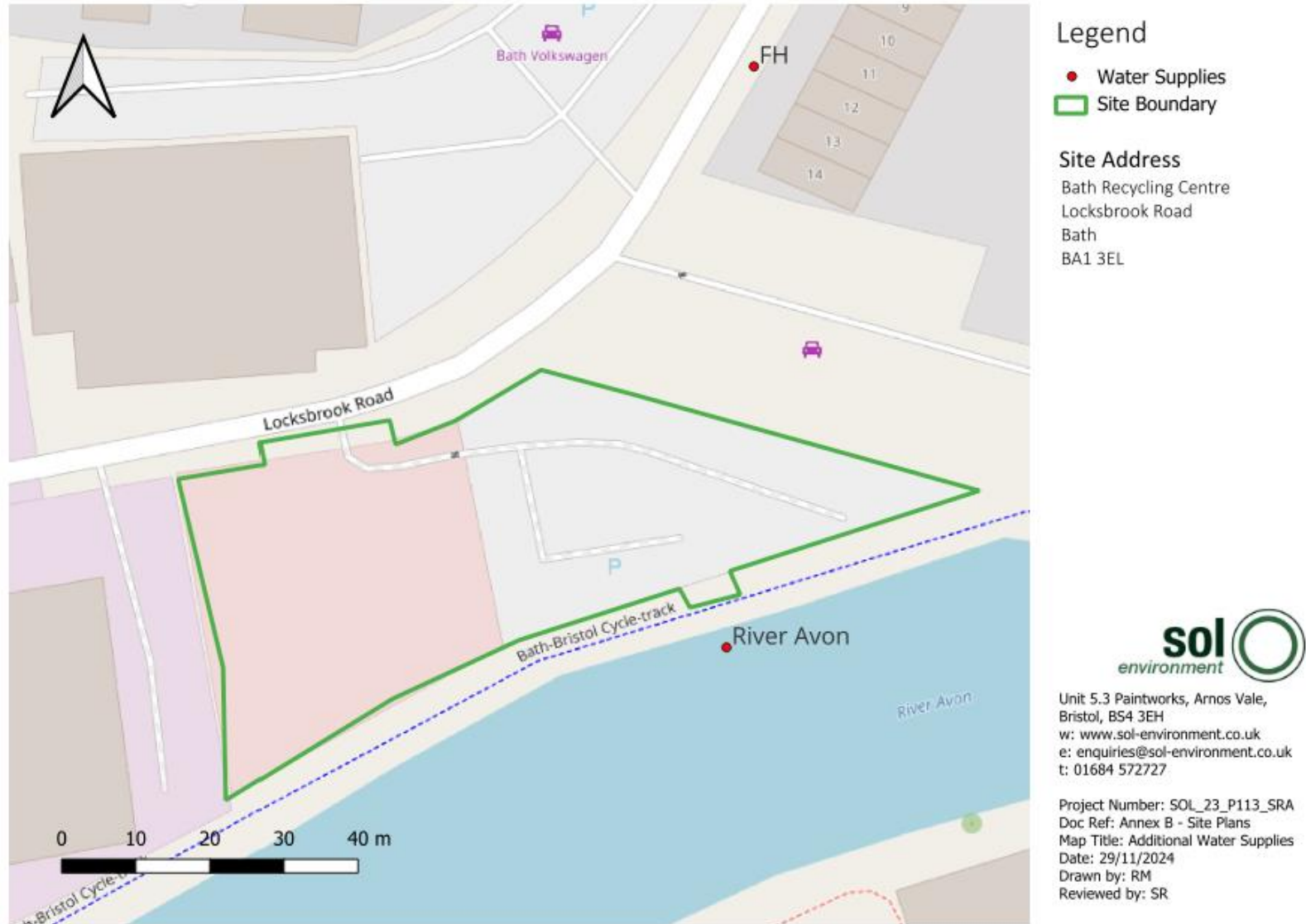


Figure 3.3 - Additional Water Supplies