

Lakeside MRF Ltd

Fire Prevention Plan

Lakeside MRF LTD

Coventry Recycling Facility, Templar Avenue,
Off Torrington Avenue,
Coventry,
West Midlands,
CV4 9AP.



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2	Shredder plant added to site plan, waste acceptance procedure changes for new waste codes in Appendix 3. Table 3, 7.15, 7.22,8.1,8.3.	Vicky Cawley	Tracey Westbury	12 December 2025
3	Table 3 updated with WEEE Asbestos and Tyres, incoming mixed waste, outgoing shredded waste. Updates to Paragraphs: 7.1 to 7.14, 7.16 to 7.21, 8.1 to 8.5, 7.1	Vicky Cawley	Tracey Westbury	04 February 2026



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Appendix 4	Inspection Checklists
Appendix 5	Stock Rotation Forms
Appendix 6	Contingency Plan



1. Introduction

- 1.1. This Fire Prevention Plan (FPP) has been produced by Westbury Environmental Limited on behalf of Lakeside MRF Ltd (the Operator) for the operation of a Waste Transfer Station at Coventry Recycling Facility, Templar Avenue, off Torrington Avenue, Coventry, West Midlands, CV4 9AP (the Site).
- 1.2. The FPP has been prepared in accordance with the Environment Agency guidance on Fire Prevention Plans: Environmental Permits (FPP Guidance), last updated 11 January 2021. The FPP Guidance requires that the FPP accounts for the fire risk from potentially combustible waste types stored on the Site.
- 1.3. The objectives of an FPP are as described in the FPP guidance and are as follows:
 - Minimise the likelihood of a fire happening.
 - Aim for a fire to be extinguished within 4 hours.
 - Minimise the spread of fire within the site and to neighbouring sites.
- 1.4. Minimum requirements for fire prevention measures are included within the FPP Guidance and relate to each of these three objectives.

Using this FPP

- 1.5. A copy of this FPP must be kept in the Site office and be readily available to all members of staff. The FPP will be subject to regular review, after a fire has occurred or operational changes have been made on Site that may potentially increase the risk of fire.
- 1.6. This FPP forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this FPP are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.
- 1.7. The contents of the FPP including fire prevention measures will be implemented on the Site through procedures within the EMS. The EMS includes an Environmental Training Checklist that includes all the required training for Site staff, see appendix 1 Environmental Training Checklist. This checklist includes training on fire prevention procedures, see Appendix 2 Fire Procedures. The training undertaken by each member of staff is recorded on their own training record as part of the EMS.
- 1.8. Training on implementing fire prevention procedures will be given to staff on an annual basis by the Site Manager. New members of staff will be given training on the fire prevention procedures during their induction.
- 1.9. All staff working on Site must understand the contents of this FPP in order to know what to do:
 - To prevent a fire occurring.
 - During a fire if one breaks out.
- 1.10. A fire drill will be completed on a six-monthly basis to test how well the FPP works and to make sure staff understand what to do in the event of a fire on Site. The fire drill will include:
 - Checks that staff are trained on relevant procedures,
 - Stockpile management,
 - Fire detection,
 - Fire suppression; and
 - Use of the Fire Quarantine Area,
 - Firewater containment.
- 1.11. A checklist of what the fire drill should contain is provided in the EMS Appendix C, Procedures & Forms, Fire Detection and What to do Procedure and in section 5 of this FPP, detecting a fire, see Appendix 2 Fire Procedures.



Content of this FPP

- 1.12. This FPP describes how the Operator will manage their Site in relation to the minimum requirements for fire prevention measures included within the FPP Guidance.
- 1.13. The location of Site infrastructure, fire prevention measures and storage of materials / waste are shown on Drawing No. 25/008a 005 FPP Site Layout Plan.
- 1.14. There is typically a risk of fire where potentially combustible wastes are stored. This FPP provides information on how the Operator will reduce the risk of an outbreak of fire and the potential impact that a fire may have.
- 1.15. Below is a breakdown of the information that is included within each Section of this FPP.
 - **Section 4** of this FPP provides information relating to managing fire risk from the storage of combustible waste. This Section addresses self-heating potentially resulting in self-combustion. This Section includes information relating to maximum storage duration, waste pile sizes and volumes, separation distances, containment facilities and how heat generated in waste piles will be managed.
 - **Section 5** of this FPP provides information on the systems that are in place to detect a fire, both during and outside of operational hours.
 - **Section 6** of this FPP provides information on the contingency measures that are to be taken during a fire. This Section includes information relating to the cessation of imported waste and notifying neighbouring businesses.
 - **Section 7** of this FPP provides information on how the Operator will suppress and fight a fire. This Section includes information relating to the use of the quarantine area and the use of available water. Steps to be taken in relation to firefighting techniques are addressed for a fire occurring during and outside of operational hours.
 - **Section 8** of this FPP provides information on the steps to be taken after a fire before the Site becomes operational. This Section includes information relating to managing firewater and contingency measures that are in place to remove any burned materials.



2. Site information

Site Location

- 2.1. The Site is located in a largely commercial area, with commercial buildings including Reed Carpeting, Refurbdoctor and LPG Cars located in close proximity to the Site. The East Coast Main Line is located approximately 20 metres south of the site. Finham Park School is located approximately 80 west of the site.
- 2.2. The entire Site extends to approximately 0.6ha, see Drawing No. 25/008a 005 FPP Site Layout Plan.

Hazards

- 2.3. It is considered that a fire will present three main hazards to nearby sensitive receptors: heat from the fire itself, air pollution (predominantly from smoke emissions) and pollution to groundwater / surface water features.
- 2.4. Heat energy from a fire may reach sensitive receptors via direct fire spreading or by the deposit of burning embers. Heat energy will be largely dependent upon the location and intensity of the fire; however, it is unlikely to spread more than 150m due to the lack of feedstock available in the vicinity of the Site. It is considered that burning embers are likely to extinguish when travelling over distances that exceed 150m.
- 2.5. Smoke produced from fires can contain harmful gases that are produced from the combustion process. The distance smoke will travel will be dependent upon the wind speed at the time of the fire; it is considered unlikely that smoke will significantly affect sensitive receptors outside of a 1km radius.
- 2.6. Significant amounts of water and / or other chemicals may be used when controlling a fire. Firewater produced from tackling a fire has the potential to contain contaminants from the chemicals used, burned materials and other pollutants present on the site. The release of firewater from the Site as a result of a fire has the potential to cause pollution to groundwater / nearby surface water features.

Receptors

- 2.7. Sensitive receptors close to the Site are identified and shown on the Drawing No. 25/008a 003 Sensitive Receptor Plan V1. A radius of 1km from the Site are included on the Sensitive Receptor Plan V1.
- 2.8. Table 1 shows the approximate distance and orientation (from the Site) of nearby sensitive receptors located within a 1km radius of the Site.

**Table 1: Sensitive receptors**

	Type	Name	Direction	Distance
1	Commercial	Refurbdoctor	North	0
2	Commercial	Reed Carpeting	East	5
3	Road	Templar Avenue	West	5
4	Road	Torrington Avenue	North	5
5	Railway Line	WCML	South	20
6	Amenity	Recreation Area	South	50
7	School	Finham Park	West	80
8	Commercial	LPG Cars	West	100
9	Commercial	Kite Packaging Ltd	North	120
10	Residential	Kingdon Avenue	Southeast	150
11	Surface Water Feature	Stream	South	165
12	School	Charter Academy	South	185
13	Residential	Peppenham Green	South	196
14	Residential	Arden Grove	Northwest	210
15	Residential	Westcotes	Northeast	265
16	School	Templar Primary School	Northwest	290
17	Protected Habitat	Ten Shilling Wood LNR	Southwest	550
18	Amenity	Prior Deram Park	Southeast	680
19	Protected Habitat	Limbrick Wood LNR	Northwest	700
20	Road	A45	East	765
21	Protected Habitat	Park Wood LNR	Southwest	820
22	School	University of Warwick	South	840

- 2.9. The Site is located within the Coventry City Council Air Quality Management Area (AQMA), designated for NO₂. This AQMA is considered to be a receptor in terms of air quality, though it is accepted that the bigger risks associated from a fire will be direct risk of fire to human health and receptors immediately surrounding the Site, particulates and risk to human health as a result of smoke.
- 2.10. The Site is located within a largely industrial area on the western extents of Coventry. Residential land uses are located northwest, south, and northeast of the Site beyond the industrial area close to the Site.
- 2.11. Refurbdoctor and Reed Carpeting commercial premises are located immediately adjacent to the Site.
- 2.12. There are a number of residential areas nearby, the closest of which is 150m southeast of the Site.

Waste Operations

- 2.13. The Operator imports mixed commercial and industrial waste for transfer and treatment. The following treatment activities are carried out on the Site:
- Hand sorting / hand picking.
 - Sorting using telehandlers / grabbers.
 - Screening
 - Shredding
- 2.14. The following combustible waste types are stored on Site:
- Incoming mixed waste.
 - Plastics.



- Wood / green waste.
- Paper / card.
- Metal.
- Waste electrical and electronic equipment (WEEE) including fridges / freezers.
- Mixed residual waste.
- Tyres

2.15. The following non-combustible waste types are stored on Site:

- Construction / demolition waste.
- Plasterboard.
- Soil.

2.16. Incoming waste is tipped within the waste segregation area as shown on the site layout plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. The waste in the reception area will typically be processed daily. The tipped waste is sorted to separate waste types, which are then moved to their relevant storage areas.

2.17. Flammable liquids, which are considered as a source of ignition in this FPP, are stored on the Site. Flammable liquids stored on the Site include fuel and oil. The location of the fuel storage is shown on Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.

2.18. Due to the size of the Site, it is necessary to have a quick turnaround of waste. Further information relating to the storage of waste and substances, as it relates to managing fire risks, can be found in Section 4 Managing Fire Risks from the Storage of Waste.



3. Management of Potential Causes of Fire

- 3.1. It is important to identify potential causes of fire on the Site in order to minimise these and reduce the likelihood of fires, thus addressing Objective 1 of the FPP Guidance; “minimise the likelihood of a fire occurring”. Potential causes of fire, taken from the FPP Guidance, are listed in Table 2 below. Information on how these potential causes of fire apply to the Site are also included in Table 2.

Table 2: Potential causes of fire.

Potential Cause of Fire	Applicable to the Site	Comments
Arson / Vandalism	Yes	There is a low risk of unauthorised access on to the Site. The Site perimeter is fenced and has a gated entrance. There is CCTV in operation 24/7.
Malfunctioning / breakdown of mobile plant, equipment, or vehicles.	Yes	There is a risk of equipment and vehicles on the Site malfunctioning and/or breaking down.
Electrical faults (including damaged / exposed cables).	Yes	There is mains electricity located on the Site. The site office and floodlighting are powered by electricity.
Discarded smoking materials	Yes	There is a risk of discarded smoking materials presenting a source of ignition.
Industrial heaters, furnaces, incinerators, or any other naked flames.	No	No industrial heaters, furnaces, incinerators, or any other naked flames will be present on the Site.
Hot exhausts on mobile plant, equipment, or vehicles.	Yes	There is a risk of exhausts of machinery, equipment and vehicles remaining ‘hot’ after use.
Batteries in End-of-Life Vehicles.	No	End of Life Vehicles are not imported onto the Site.
Fuel and waste oil stored on the Site.	Yes	Fuel and gas are stored on the Site. There is a risk that fuel or gas could present a fire risk or source of ignition.
Leaks and spills from site vehicles.	Yes	Vehicles will be used on the Site to import/export waste loads. There is a risk of one of these vehicles leaking fuel or oil.
Leaks and spills from End of Life Vehicles.	No	End of Life Vehicles are not imported onto the Site.
Build-up of loose combustible waste, dust, and fluff.	Yes	There is a risk of loose combustible waste, dust and fluff building up within storage areas of combustible waste.
Reactions between wastes.	No	There are no waste types accepted on to the Site that, when mixed, would create a reaction e.g. an explosion. Waste Acceptance Procedures, see Appendix 3 Waste Acceptance Procedures, within the EMS will ensure that only permitted waste types are accepted on to the Site. Waste Acceptance Procedures will include: <ul style="list-style-type: none"> The List of Waste codes from the Environmental Permit. Instructions to visually check loads upon reception, acceptance and unloading.
Deposited hot loads.	Yes	There is a risk of a ‘hot load’ entering the Site.
Self-heating resulting in self-combustion.	Yes	There is a risk of self-heating within piles of combustible waste stored on the Site and leading to self-combustion.
Operations carried out by neighbouring businesses.	Yes	The Site is located within an area used for industrial uses and therefore has neighbouring businesses.



- 3.2. The remainder of the points in this Section describe in detail how the Operator will minimise the risks associated with the potential causes of fire that relate to this Site, as identified in Table 2 above.

Site Security

- 3.3. Site security is important in order to reduce the likelihood of unauthorised access on to the Site.
- 3.4. The permitted area is accessed directly from Torrington Avenue or Templar Avenue straight into the Site. The entrance to the Site has a lockable gate and is secured outside of operational hours. There is fencing and other buildings' walls surrounding the perimeter of the Site.
- 3.5. There is floodlighting that covers the entrance gate to the Site in order to deter potential intruders. The Site is manned during operational hours.
- 3.6. The Site is manned during operational hours and has CCTV in operation.

Plant, Equipment and Vehicles

- 3.7. Plant, equipment and vehicles are used on the Site. Plant and equipment include machinery for the movement and treatment of waste on the Site. Vehicles are used to import and remove waste to and from the Site.
- 3.8. Mobile plant / equipment that is not being used will be stored at least 6m away from combustible waste types and combustible materials as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. All mobile plant is fitted with fire extinguishers to aid in active firefighting. The function of fire extinguishers is checked on an annual basis, using Inspection Checklists, see Appendix 1 Inspection Checklists.
- 3.9. Plant and equipment have the potential to malfunction / breakdown. In some instances, this could cause a fire, which in turn could spread to combustible waste stored on the Site. Plant and equipment will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction. Plant and equipment will be checked for malfunctions daily, using Inspection Checklists, see Appendix 1 Inspection Checklists. Any fault will be noted on the Inspection Checklists and rectified as soon as possible.
- 3.10. Dust or particles settling on hot exhausts / engines can cause fires. An inspection is carried out at the end of the day to ensure the mobile plant / vehicles are cool and to remove any dust build-ups. This inspection will ensure that mobile plant is monitored for 15 minutes after shutdown to ensure it has cooled. Mobile plant is stored outside when not in use / at the end of the day, to aid in the dissipation of any heat.
- 3.11. There is a risk of fuel leaking / spilling during refuelling of vehicles / mobile plant on the Site. Spill kits are available on the Site and will be made available during refuelling. Fines / soils are stored on the Site which can be used as a 'spill kit' in the event of a large spill. The condition / integrity of the fuel tank will be checked on a monthly basis using Inspection Checklists, see Appendix 1 Inspection Checklists.
- 3.12. There is a potential for vehicles entering the Site to leak fuels and oils. Vehicles entering the Site will be owned by the Operator or their customers. Vehicles owned by the Operator will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction, which will include any corrosion, cracks, or leaks in any fuel/oil tanks. Spills kits will be used in the event of a spill or leak from the Operator's vehicles and any other vehicles on the Site.
- 3.13. Incoming loads containing 'hot loads' have the potential to spread fire to other waste types stored on the Site. In extreme circumstances, 'hot loads' may result in the carrying vehicle catching fire. Hot loads are immediately directed to the Fire Quarantine Area as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.

Ignition Sources

- 3.14. A no smoking policy applies across the entire Site.



- 3.15. Hot works may be carried out when required as part of the maintenance regime for the Site. A fire watch will be carried out for a minimum of 30 minutes by visual inspection after completion of any hot works.
- 3.16. No other naked flames, including incinerators, industrial heaters, space heaters, furnaces, are present on the Site.
- 3.17. The storage of flammable liquids is considered as an ignition source. Fuel is considered as a potential source of ignition. There is a risk of fuel leaking / spilling during refuelling of vehicles / mobile plant on the Site. Spill kits are available on the Site and will be made available during refuelling. The condition / integrity of the fuel tank will be checked using Appendix 1 Inspection Checklists.
- 3.18. Oil and fuel storage at the Site will comply with the oil storage regulations for businesses guidance on the gov.uk website (last updated 4 August 2020). Fuel is stored in double skinned tanks in accordance with the oil storage regulations.
- 3.19. Oils are stored in a container on drip containment or within bunds in accordance with the oil storage regulations for businesses guidance found on the gov.uk website. The Site will maintain sufficient spill kit equipment to clear up any spillages should they occur. Standard operational procedures apply to prevent any spilled liquids being tracked across the Site. The above prescriptions will minimise the risk of fire from these elements.
- 3.20. All ignition sources present on the Site will be kept at least 6m away from combustible waste types.

Electricity

- 3.21. Electricity is used on the Site to power some of the operations, including the picking line, Site office, and floodlighting.
- 3.22. Damaged or exposed electrical cables and fittings have the potential to give off excess heat / create sparks. Power sockets can be overloaded which may result in the overheating of these sockets and wires.
- 3.23. All electrics, including wiring and equipment, on the Site are certified by a qualified electrician on an annual basis. A record of this certification is recorded using the Inspection Checklists. Associated records will be kept.
- 3.24. Inspections of electrics, including wiring and equipment, are carried out by site staff monthly to ensure that cables are in a good condition and sockets are not overloaded. Inspections are recorded using the Inspection Checklists form, see Appendix 1 Inspections Checklists.

Build-up of Loose Combustible Waste

- 3.25. Combustible residues collecting around waste storage areas can present a fire risk.
- 3.26. The storage time of combustible waste on the Site is minimised. Stockpiles will be inspected on a weekly basis to identify when all combustible waste in a storage area has been removed. Once empty, the storage area will be cleaned to remove any residual waste / dust / fluff. A storage area will be cleared if the area has not been cleared within the maximum storage duration. The clearing and cleaning down of storage areas will be recorded. These checks will be recorded using a Stock Rotation Form, see Appendix 5 Stock Rotation Forms.
- 3.27. A weekly review of the Stock Rotation Forms will be carried out to ensure compliance with maximum storage duration times for the waste. This review is recorded on the Appendix 5 Stock Rotation Forms.

Self-Heating Resulting in Self-Combustion

- 3.28. The risk of self-heating occurring within waste piles is influenced by the following:
 - Waste type.
 - Particle size.
 - Storage time.



- Volume of stockpile.
- Ambient temperature / external conditions (including heat produced from waste operations).

3.29. Self-heating is a potential cause of fire, as it may lead to self-combustion. Self-heating can be managed in a number of ways. The FPP Guidance states the following:

For All Waste:

- Management of storage duration times for combustible waste.
- Good stock rotation to ensure quick-turnaround of materials i.e. first-in, first-out principle. Complete turnaround of waste and use of the first-in, first-out principle will ensure that waste is not stored on Site for periods longer than the maximum storage duration.
- Minimising stockpile dimensions, including height.
- Minimising stockpile volumes.
- Managing any seasonal variations in waste types.
- Allow any heat generated during shredding to be released before storage.
- Keep exposed metal content within waste piles to a minimum.

For Waste Stored on Site for Longer than 3 Months:

- Temperature monitoring using a probe.
- Routine turning of piles to ensure waste remains cool and localised heating is dissipated.

3.30. Combustible waste stored on the Site will be stored for a maximum of 3 months. The FPP Guidance does not require that an operator monitors temperatures or routinely turns piles if waste is stored for less than three months. There is therefore no proposal to monitor temperatures or routinely turn piles on this Site.

3.31. It is considered that self-heating is a significant contributor to fire risk on waste sites. As such, this risk is addressed in detail in Section 4 Managing Fire Risks from the Storage of Waste.

Reactions Between Waste

3.32. Any potentially reactive waste types identified within a load will be separated and stored appropriately, using a quarantine area if necessary. The location of the quarantine area is shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. Such wastes will be identified on arrival to the Site during the visual inspection which is part of the waste acceptance procedure.

Neighbouring Businesses and Infrastructure

3.33. Adjacent to the Site are Reed Carpeting and Refurbdoctor. Given their proximity to the Site, these neighbouring businesses are at risk of being impacted by a fire at the Site, either directly or indirectly via smoke impacts.

3.34. The West Coast Mainline Railway Line is location 20m south of the Site. Torrington Avenue is located immediately to the north of the Site and Templar Avenue immediately to the west of the Site. Depending on wind direction, all three receptors could be adversely impacted by any flames or more likely smoke or ash resulting from a fire on Site.

3.35. Finham Park School is approximately 80m west of the Site, the distance means it is unlikely to be at direct risk from a fire but could be adversely impacted by smoke from a fire if the wind conditions were blowing in that direction. Wind data for the nearby weather station suggests wind rarely blows towards the west, in the direction of the school and so the risk of impacts is reduced but not negligible.

3.36. It is considered unlikely that a fire involving the combustible waste stored on the Site would reach these neighbouring businesses due to the lack of combustible / flammable materials in the vicinity of the Site. A fire would therefore have little fuel/feedstock to spread to neighbouring businesses.



- 3.37. The risk of fire spreading is mitigated by the Site operations and procedures implemented by Lakeside MRF. The waste operations are carried out within an open fronted structure, as such there are metal walls shielding waste. Waste storage outside is stored within bays built with concrete fire walls between each bays.



4. Managing Fire Risks from the Storage of Waste

Storage Duration

- 4.1. Restricting the maximum storage duration of combustible waste will reduce the risk of self-heating within waste piles.
- 4.2. The maximum storage duration for combustible waste (except for aluminium and electrical cable) stored on the Site is three months in accordance with the FPP Guidance.
- 4.3. Good stock rotation ensures effective management of the time that waste is stored on Site. Waste storage areas will be inspected daily. Storage areas will be cleared if they have not been cleared within the maximum storage duration.

Stock Rotation Policy

- 4.4. Good stock rotation ensures effective management of the time that waste is stored on Site.
- 4.5. The Site operates a first in, first out policy for waste. Incoming waste will be screened, and separated waste will be stored according to their type. Waste from a storage area that is being sent off the Site will be removed in its entirety, when possible, to ensure full stock rotation.
- 4.6. A cleared storage area, containing no combustible waste, will be cleaned to remove any residual loose combustible waste, dust, or fluff. The clearing and cleaning down of storage areas is recorded on the Appendix 5 Stock Rotation Forms. Each storage area is assigned a number, as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.

Pile Dimensions, Volumes and Separation Distances

- 4.7. The recommendations within the FPP Guidance in relation to stockpile sizes are proposed to be met on this Site. Stockpile volumes of waste stored on the Site are less than the recommendations included within the FPP Guidance.
- 4.8. Storage areas are numbered to easily identify waste as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. Table 3 below summarises combustible waste storage area sizes and maximum individual pile sizes, the volume for each waste type and the maximum storage times. Storage area sizes are shown on the site layout plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.

**Table 3: Combustible waste storage area details**

Storage Area Ref.	Storage Area Contents	Storage Facility	Storage Area Size (LWH)	Maximum Volume	FPP Guidance Maximum Storage Volume			Maximum Storage Time (Regulatory Guidance)
					Loose and more than 150mm	30 to 150mm or baled	Less than 30mm	
1	Metal	Bay	8m x 3m x 3m	48m3	750m3	450m3	450m3	3 months
2	Plasterboard	Bay	8m x 3m x 3m	48m3	N/A	N/A	N/A	3 months
3	Inert Soil/concrete	Bay	8m x 3m x 3m	48m3	N/A	N/A	N/A	3 months
4	POPS Waste	bay	8m x 3m x 3m	48m3	450m3	450m3	450m3	3 months
5	Metal	Bay	8m x 3m x 3m	48m3	750m3	450m3	450m3	3 months
6	Wood	Bay	8m x 3m x3m	48m3	750m3	450m3	300m3	3 months
7	Plastic	Bay	8 x 3m x 3m	48m3	750m3	450m3	300m3	3 months
8	uPVC Frames	Bay	8m x 3m x 3m	48m3	750m3	450m3	300m3	3 months
9	Residual Waste	Bay	8m x 3m x 3m	48m3	300m3	300m3	300m3	28 days
10	Incoming Mixed Waste	Bay	10m x 4m x 3.6m	144m3	300m3	300m3	300m3	3 months
11	Outgoing shredded waste	Bay	10m x 4m x 3.6m	144m3	300m3	300m3	300m3	3 months
12	Outgoing shredded waste	Bay	10m x 4m x 3.6m	144m3	300m3	300m3	300m3	3 months
13	WEEE	12 yard Skip	3.7m x 1.8m x 1.7 m	11m3	450m3	450m3	450m3	3 months
14	Asbestos	12 yard skip	3.7m x1.8m x 1.7m	11m3	N/A	N/A	N/A	3 months
15	Tyres	Bay	4m x 4m x 4m	36m3	450m3	300m3	300m3	3 months



- 4.9. A maximum pile height of 4m for combustible waste will be enforced on the Site in accordance with the FPP Guidance.
- 4.10. Waste stored in bays will be stored with a maximum height of 3m to allow for a 'freeboard' space of 1m minimum at the top and sides of the walls at all times to prevent fire spreading over and around the walls. Waste stored in the waste segregation building will be stored at a maximum height of 3.6m.
- 4.11. The minimum separation distance for combustible waste stockpiles stored on the Site is 6m, where waste is not stored within a bay or container.
- 4.12. The 6m separation distances between combustible waste piles, buildings and the Site perimeter required by the FPP guidance is not required on this Site. Combustible waste is either stored within contained areas or abutted by a 4m high Lego block bay walls. A Lego-block wall runs along the inside perimeter of the waste segregation building.

Particle Size

- 4.13. It is in the best interest of the operator to remove treated waste (typically with a smaller particle size) as soon as possible to make space for incoming waste. Ensuring that processed waste, with a smaller particle size, is removed as soon as possible will ensure that waste on the Site will be stored in its largest form.

Storage Bays and Containers

- 4.14. Waste is stored in bays and temporarily in the waste segregation building, as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.
- 4.15. The waste bays used on Site provide a barrier, allowing better control of stockpile sizes and waste mixing. All bay walls are made from Lego blocks, confirmed to have a fire resistance period of at least 120 minutes.
- 4.16. If safe to do so, a mobile plant will be used to quickly transfer waste from the storage bays to the fire quarantine area in the event of a fire.
- 4.17. Contravening waste handpicked from the incoming loads is stored in the quarantine area located on the Site, see Drawing No. 25/008a 005 FPP Site Layout Plan.
- 4.18. Bays are accessible by mobile plant and firefighting equipment to allow for a fire inside the bay, to be put out.
- 4.19. Mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Fire Quarantine Area.
- 4.20. A 6m separation distance is not enforced between bays as waste is stored in small quantities. The combined volume of skips/containers without a 6m separation distance is significantly below the maximum storage volumes stated in the FPP Guidance. As such, skips/containers with no six-metre separation distance are considered as one stockpile in this FPP. Skips/containers are roll on / roll off, easily accessible and can be moved in the event of a fire.

Risk to Surface and Groundwater

- 4.21. Combustible waste is stored and treated on impermeable surfacing. Surface water is retained on Site.
- 4.22. The waste storage areas are contained by Lego blocks The Site drains to central drain and has a fall of 1 in 100.
- 4.23. Firewater will be contained within the Site, before being removed by a licensed contractor to a suitably licensed facility.



Seasonal Variations

- 4.24. Imported waste is mixed commercial and industrial waste. There may be seasonal variations with regard to the amount of waste imported on to the Site. The export of waste will be increased during these variations to ensure that maximum storage durations of waste are not exceeded.

Managing Temperatures within Waste Piles

- 4.25. Combustible waste stored on the Site will be stored for a maximum of 3 months. The FPP Guidance does not require that an operator monitors temperatures or routinely turns piles if waste is stored for less than 3 months. There is therefore no proposal to monitor temperatures or routinely turn piles on this Site.
- 4.26. In the event of prolonged hot weather, where possible, combustible waste will be stored out of direct sunlight and under a canopy. If this is not possible, combustible waste piles will be turned daily to ensure any localised warming within the waste is dissipated quickly.
- 4.27. Waste storage time for combustible wastes is minimised to reduce the likelihood of heat building up within a waste pile to a point to where self-combustion could occur.

Batteries

- 4.28. Batteries will be stored in appropriate weatherproof containers. Different types of batteries will be kept in separate weatherproof storage containers.
- 4.29. Lithium-Ion and Nickel-metal hydride Batteries have the potential to explode when damaged, punctured or overheated and are a significant ignition source for fires on waste sites.
- 4.30. Site operatives are trained to be vigilant of items that may contain Lithium-Ion batteries when sorting incoming waste. Lithium-ion batteries will be separated and stored separately to other combustible waste types.
- 4.31. Batteries will be stored in quarantine 6m away from buildings and other combustible materials. They will be stored in a dedicated, weatherproof, fire-resistant container with a lid. Damaged or leaking batteries are placed within a separate weatherproof, fire-resistant container filled with sand or similar inert material.
- 4.32. Batteries are not treated on Site. Batteries are consigned to a licensed hazardous waste facility for appropriate treatment or recycling. Waste Transfer Notes and Consignment Notes for battery waste are retained in accordance with the Duty of Care and Hazardous Waste Regulations. Records of battery identification, segregation, and disposal are maintained as part of the Site's Environmental Management System (EMS).

Persistent Organic Pollutants (POPs) Management at the Site

- 4.33. Persistent Organic Pollutants (POPs) are toxic chemical substances that persist in the environment, bioaccumulate through the food web, and pose a risk to human health and the environment. Waste containing POPs must be identified, segregated, and managed in accordance with the **Persistent Organic Pollutants Regulations 2019** and the Environment Agency's guidance on POPs waste classification and disposal.

Identification and Classification of POPs Waste

- 4.34. Site operatives are trained to identify waste types that may contain POPs, including but not limited to:
- Waste upholstered domestic seating (WUDS)
 - PVC plastic waste
 - Electrical equipment containing flame retardants.
 - Items with brominated flame retardants (e.g. textiles, foams, plastics)



- 4.35. Visual inspections of incoming waste are carried out at the point of reception to identify potential POPs-containing items. Suspected POPs waste is segregated immediately and directed to the designated quarantine area.
- 4.36. The Site follows the classification process outlined in the EA guidance: <https://www.gov.uk/guidance/identify-and-classify-waste-containing-persistent-organic-pollutants-pops>

Storage and Fire Risk Mitigation

- 4.37. POPs waste is stored in a dedicated, weatherproof container within the quarantine area, away from ignition sources and combustible materials.
- 4.38. The quarantine area is clearly marked on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan and maintains a minimum 6m separation distance from other waste types.
- 4.39. In the event of a fire, the Fire Service will be informed of the presence and location of POPs waste to ensure appropriate firefighting and containment measures are taken.

Disposal and Record Keeping

- 4.40. POPs waste is consigned to a **suitably authorised hazardous waste facility** for destruction via high-temperature incineration, as required under the POPs Regulations.
- 4.41. Waste Transfer Notes and Consignment Notes for POPs waste are retained in accordance with the Environmental Permitting Regulations and Duty of Care requirements.
- 4.42. Records of POPs identification, segregation, and disposal are maintained as part of the Site's Environmental Management System (EMS).



5. Detecting a fire

Detecting of a Fire Outside of Operational Hours

- 5.1. The Operator will install UKAS accredited smoke detectors/thermal detectors within 9 months of permit issue or prior to the acceptance of combustible waste to the Site, whichever is sooner. Smoke detectors on Site meet the three objectives of the FPP Guidance.
- They will minimise the likelihood of a fire happening on Site as the waste storage areas are within range of the smoke detectors and the detectors located in the Site office will be loud enough to be heard by all Site operatives.
 - They will help to meet the aim of a fire to be extinguished within 4 hours by alarming staff during operating hours when a fire breaks out and during non-operational hours, as the Site Manager and Director are alerted to smoke detectors going off at any time via devices.
 - The smoke detectors on Site will minimise the spread of fire within the Site and to neighbouring sites as the quick knowledge of smoke on Site, can help staff to act quickly to suppress the fire to stop the spread.
- 5.2. The Site Manager and Director of Lakeside MRF Limited are alerted to smoke detectors going off at any time via devices e.g. phone, tablet, computer. During operational hours, smoke detectors located in the Site office will be loud enough to be heard by all Site operatives.
- 5.3. The Site Manager / Director will contact the emergency services immediately if alerted of a fire on their devices by the smoke detectors.
- 5.4. West Midlands Fire Service average response time as of March 2024 was 7 minutes according to West Midlands Fire Service's website.
- 5.5. The nearest fire station is Canley Fire Station, located approximately a 5-minute drive from the site. It is therefore considered that West Midlands Fire Service would be able to start firefighting procedures within 12 minutes of being alerted to a fire at the Site.
- 5.6. In the event that the Director (or other senior management) is the first responder, they will attempt to suppress the fire before the Emergency Services arrive if it is safe to do so. Information relating to active firefighting measures are included in Section 7 Suppressing a Fire and Firefighting Techniques.

Detection of a Fire during Operational Hours

- 5.7. All members of staff are trained to be vigilant to the signs of fire and to report any incidents to site management.
- 5.8. The emergency services will be informed immediately, by the operator, if there is any evidence / suspicion of a fire on the Site.
- 5.9. The fire watch, during operational hours, is undertaken by site personnel, daily. These fire watches are recorded using the Inspection Checklists, see Appendix 4 Inspection Checklists.
- 5.10. Visual inspections are carried out throughout the working day to check for fires / potential causes of fire. Staff are working to sort / separate the waste throughout the day and will therefore be able to quickly identify any signs that the waste is heating up, producing smoke, or showing any other signs of a fire.



6. Contingency measures during a fire

- 6.1. The Operator will implement fire contingency plans via procedures contained within the EMS, see Appendix 6 Contingency Plan.
- 6.2. The Operator can quickly cease waste imports in the event of a fire. Vehicles used to import waste on to the Site are the Operators' own and customers. All Site staff will be instructed to cease the importation of waste in the event of a fire.
- 6.3. During an event there will be no deliveries or export activity from the site, with such operations only allowed once all decontamination activities have been completed to a satisfactory standard. All customers who wish to deliver wastes during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. If urgent, deliveries will be directed to an alternative waste facility in the borough; details of which can be found on the Environment Agency's public register.
- 6.4. Neighbouring businesses will be contacted in the event of a fire. Contact details for neighbouring businesses and residents are included on the Key Contacts Form within the EMS.
- 6.5. In case of circumstances where maximum waste storage time are likely to be exceeded then containers of combustible waste metal will be frequently inspected for any signs that the waste is heating up, producing smoke, or showing any other signs of a fire.
- 6.6. The firewater produced from tackling a fire will be removed by a vacuum tanker to a suitably licensed facility. Fire water will be removed by a suitably licensed contractor.



7. Suppressing a fire and firefighting techniques

Use of the Quarantine Area

- 7.1. The Operator has a Fire Quarantine Area that accords with the FPP Guidance requirements and is shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. The Fire Quarantine Area may be used for storing materials to prevent the spread of fire or to isolate materials that are likely to re-ignite or have been burned. This will aid in the overall suppression of a fire. The Fire Quarantine Area will be kept free of materials so that it can be used in the event of a fire.
- 7.2. The Fire Quarantine Area has sufficient separation distances (minimum of 6m) from any sources of ignition or stored combustible waste. The Fire Quarantine Area will be able to store approximately 144m³ of waste which is 50% of the volume of the largest stockpile of combustible waste stored on the Site.
- 7.3. The Fire Quarantine Area will be an area of at least 7m x 7m x 3m, kept free at all times. The location of the Fire Quarantine Area is shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan. The Fire Quarantine Area will not be located within 6m of combustible waste, flammable materials e.g. fuel, or any sources of ignition.
- 7.4. The flexibility of the Fire Quarantine Area will be covered in the EMS training for new and existing staff. Every staff member must be aware that the Fire Quarantine Area must be kept clear at all times and not be located within 6m of combustible waste, flammable materials, or any sources of ignition.
- 7.5. The Fire Quarantine Area will allow for faster active firefighting with regard to the removal of burning or burned material.

Use of Suppression Systems

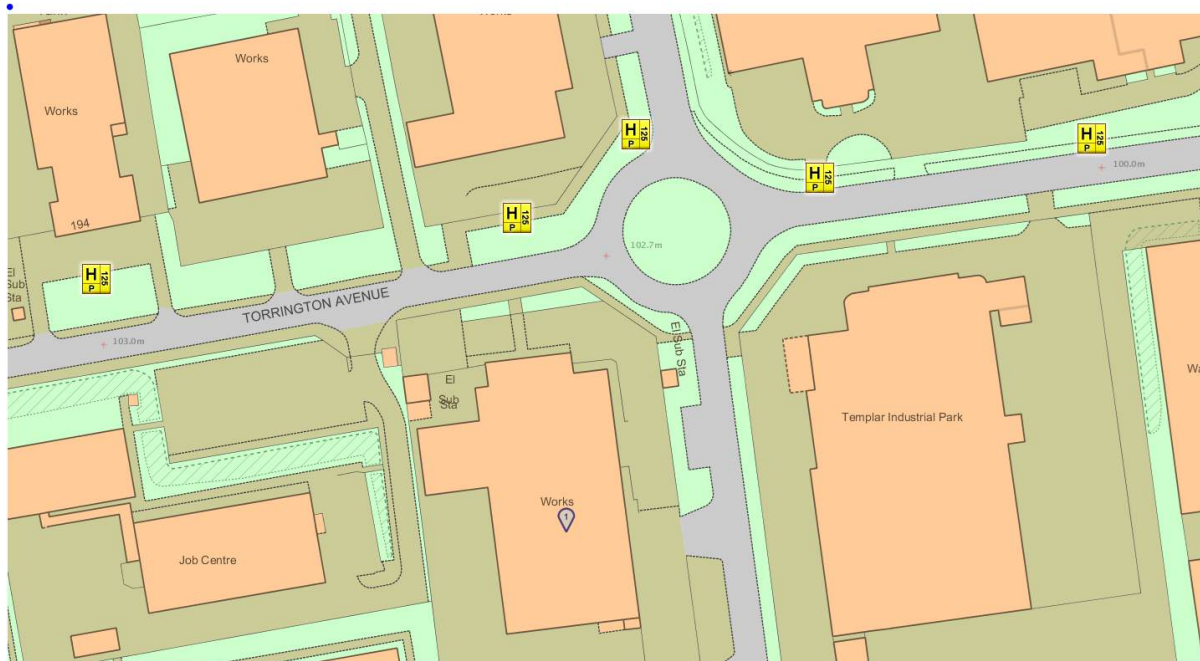
- 7.6. There are fire extinguishers and a water bowser with hose in various places around the site as shown on the Site Layout Plan, see Drawing No. 25/008a 005 FPP Site Layout Plan.
- 7.7. All mobile plant is fitted with a fire extinguisher.

Use of Water

- 7.8. The Site has access to mains water. Fire extinguishers will be present on the Site and are located within the Site office.
- 7.9. Hoses connected to mains water and fire extinguishers will be used as a first response measure in the event of a fire or to extinguish smaller fires before a larger problem arises.
- 7.10. Water is available via fire hydrants, the nearest of which is located on Torrington Avenue, approximately 10m north of the permitted area, see Figure 1: Location of fire . There are additional fire hydrants located in the vicinity of the Site. However, due to the distance from the road to the operational yard area, it is unlikely that fire appliances will have hoses long enough to reach a fire on the operational yard. Therefore, inert materials would be used to suppress a large fire at the Site. Alternative suppression methods are detailed later in this section.
- 7.11. FPP Guidance states 2,000 l/min for 3 hours is appropriate for a 300m³ stockpile of waste.
- 7.12. The use of water and fire extinguishers (by site operatives) as a fire suppressant is a first response measure prior to the emergency services arriving and using the water from the nearby fire hydrants.
- 7.13. Site operatives must only tackle small fires on the Site and must not put themselves at risk by trying to fight medium / large fires. In the event of a medium / large fire, the emergency services will always be contacted. Upon arrival on Site, the fire service will assume overall control of all firefighting activities.



Figure 1: Location of fire hydrants.



- 7.14. It is calculated that a total of 172,800 litres of water would be required to extinguish a fire involving the largest pile of combustible waste stored on the Site (144m³). It is calculated that it will take approximately 86 minutes (1.5 hours) to extinguish this fire using the water from the nearby hydrants alone, which is within the maximum 4-hour time stated in the FPP Guidance. The calculation is as follows:
- 2,000 l/min x 180 min (3 hrs) = 360,000 l of water to extinguish a pile involving 300m³ of waste.
 - 360,000 l of water / 300m³ of waste = 1,200 l of water per m³ of waste.
 - 1,200 l per m³ x 144m³ = 172,800 l (173m³).
 - 172,800 litres of water / 2,000 l/min = 86 minutes to extinguish a fire involving the largest pile of combustible waste stored on the Site.

- 7.15. Further information regarding managing firewater on the Site is provided in Section 8 Recovery after a fire.

Use of Inert Materials e.g. soil for Fire Suppression

- 7.16. The use of inert materials e.g. soil will be used for fire suppression in the event of a larger fire occurring on Site, which cannot be managed by fire extinguishers and/or mains water.
- 7.17. Typically, this method will be utilised during operational hours when trained operatives are on Site. However inert soils may also be used out of hours as soon as a trained operative has reached the Site.
- 7.18. Stockpiles of soil are located at the Site for the purposes of fire suppression. These materials are located on the concrete storage pad and can be used for fire suppression if required.
- 7.19. The following mobile plant is available on Site to transport inert materials:
- 1 x loading shovel at 6.9m³ capacity.
- 7.20. A calculation is provided below to estimate the amount of time taken to extinguish a fire involving the largest pile of waste stored on the Site. It is estimated that a total of 24m³ of soil is required to smother the largest pile of waste stored on the Site to a depth of 0.5m, along its exposed faces (front and top elevation).



- Section 1 - Top face area (Waste pile dimensions 10m x 4m x 3.6m)
 - $5m \times 4m = 20m^2$ (rear area of bay waste pile assumed cube shape)
- Section 2 - Front face of pile (slope) area = Surface Area = $\cos(\alpha) / \text{Planimetric Area}$ (5m x 8m)
 - $\cos(\text{height/run}) (3.6 / 5) = 0.72$
 - Planimetric area of slope $5 \times 4 = 20m^2$
 - Surface area of slope = $20 / 0.72 (\cos) = 27.8m^2$
 - Total surface area of waste pile equals Section 1 + Section 2 = $47.8m^2$
- Total volume of soil required to suppress a fire using a depth of 0.5 metres of soil is $24m^3$ (calculated by $48 m^2$ (Total surface area) X 0.5m (depth of inert material for smothering)).

7.21. The calculation below is provided for reference against the FPP Guidance. It is estimated to take 8 minutes to transport soil between the soil bund located on the eastern boundary of the Site, and the largest pile of combustible waste, which is stored in the building, then back to the bund (a round trip). Based on an 8-minute round trip, it would take approximately 36 minutes to extinguish a fire involving the largest pile of waste stored on the Site, which meets the aim of a maximum four-hour time stated in the FPP Guidance, see calculations below:

- Capacity of loading shovel is $6.9m^3$
- $24m^3$ of soil is required to extinguish $144m^3$ of combustible waste.
- $24m^3$ of soil / $6.9m^3$ capacity of loading shovels = 4
- 4 trips X 8-minute round trip = 32 minutes (approximately 1 hour) to extinguish the largest pile of waste. This is well within the maximum 4-hour extinguishing time required by the Fire Prevention Plan Guidance.

7.22. Waste may need to be spread out by the loading shovel plant if the shovel cannot reach the top of the pile.

Firefighting Techniques

Out of Operational Hours

7.23. Once a fire is detected and the Key Holder (Site Manager or Director) is alerted via mobile phone, the Key Holder will take approximately 20 minutes to reach the Site. This will be approximately four times longer than the fire service, as West Midlands Fire Service average response time as of March 2024 was 7 minutes according to West Midlands Fire Service's website.

7.24. Generally, the steps described in the section below on 'Firefighting Techniques - Within Operational Hours' would be implemented if the operator arrives on the Site prior to the emergency services. However, the use of inert materials as a firefighting technique is only practicable during operational hours due to safety issues.

7.25. Firefighting techniques outside of operational hours (if the Operator arrives at the site prior to the fire service) will therefore be limited to the use of water from the fire hoses located on the Site, if it is safe to do so, prior to the arrival of the fire service.

7.26. West Midlands Fire Service have confirmed that the emergency services will enter the Site through force if they arrive at the Site and the gated entrance is locked.

Firefighting Techniques – Within Operational Hours

7.27. Lakeside MRF Limited implement the following suppression and firefighting measures to minimise the impact of a fire:

- The emergency services will be contacted if they have not been already.



- Neighbouring businesses and key contacts (including firewater removal company) will be contacted.
- If safe to do so, hoses connected to mains water will be used to tackle any small fire on the Site.
- If safe to do so, mobile plant will be used to remove combustible waste from the vicinity of the fire, to minimise the likelihood of a fire spreading.
- If safe to do so, mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Fire Quarantine Area.
- The Site Manager will liaise with the emergency services upon arrival to inform them of the locations of combustible materials and the active firefighting actions taken up to this point e.g. any chance of reignition of burned waste.
- The emergency services can use water from the hydrants, located close to the Site, to extinguish the fire.

7.28. Fire Procedures within the EMS will implement the requirements of this FPP on the Site. These procedures form the basis for training and shall be followed in the event of a fire.



8. Recovery after a fire

Managing Firewater

- 8.1. The calculation in Section 7 Suppressing a Fire & Firefighting Techniques states that a maximum of 172,800 litres (173m³) of firewater may be produced when tackling a fire involving the largest pile of waste stored on the Site. However, it is unlikely that water will be used to suppress a fire at the Site due to the distance to the fire hydrants on Torrington A
- 8.2. Since the Site does not have ready access to fire hydrants, as detailed in Section 7 above, suppression using inert materials, will be the main fire suppression method at the Site. Therefore, it is not considered necessary to demonstrate containment of 173 m3 of firewater.
- 8.3. The waste storage and treatment areas of the Site has impermeable surfacing. The drainage fall at the Site is 1:100 and falls to a drain in front of the Waste Segregation Building as shown on the drainage plan, see Drawing No. 25/008a 004 Drainage Plan V2.
- 8.4. If water is used to suppress a fire on the Site, firewater will start to settle on the impermeable surface of the Site.
- 8.5. In the event of a fire an inflatable bung will be inserted into the drain to prevent firewater being discharged from the interceptor into the mains.
- 8.6. The integrity of the Site infrastructure, including surfacing, walls, fences and building containment features are inspected on a regular basis using Appendix 4 Inspection Checklists. Any defects are rectified as soon as reasonably practicable.
- 8.7. Firewater on the Site will be removed constantly during (if logistically viable) and after a fire event using vacuum tankers operated by a licensed contractor.

Contingency Measures – Managing Burned Materials

- 8.8. There is a chance that waste re-ignites after it has been extinguished. Burned waste will be monitored following a fire to identify any signs that the waste is re-igniting and to ensure that the waste is completely extinguished. Combustible waste may be removed from the location of the fire to the Fire Quarantine Area if necessary. Movement of burned waste may minimise the risk of the fire spreading.
- 8.9. Ash and partially burned materials resulting from a fire will be contained and then removed from the Site. This is to reduce the risk of contaminants leaching into surface water features / reaching groundwater. Burned materials will be sent to a suitably licensed landfill.
- 8.10. Residues from a fire that has involved waste containing persistent organic pollutants (POPs) will be removed from the Site in accordance with The POPs Regulations 2019.
- 8.11. The importation of waste will resume following the removal of burned materials and the removal of firewater from the Site.

Steps to Becoming Operational

- 8.12. Following a fire, Lakeside MRF Limited employ the following steps before accepting waste and becoming operational:
 - All burned materials will be removed to a suitably licensed facility.
 - All firewater contained on the surface of the Site will be removed by a suitable licensed contractor to a suitably licensed facility.
 - Following any environmental incident on the Site including fires, details of the event will be recorded on an Accident / Incident form included within the EMS. Completion of the form will enable all the details of the fire to be recorded including sequence of events, causation, size and extent of fire, damage sustained (internally and externally), recording of the investigation and actions taken.



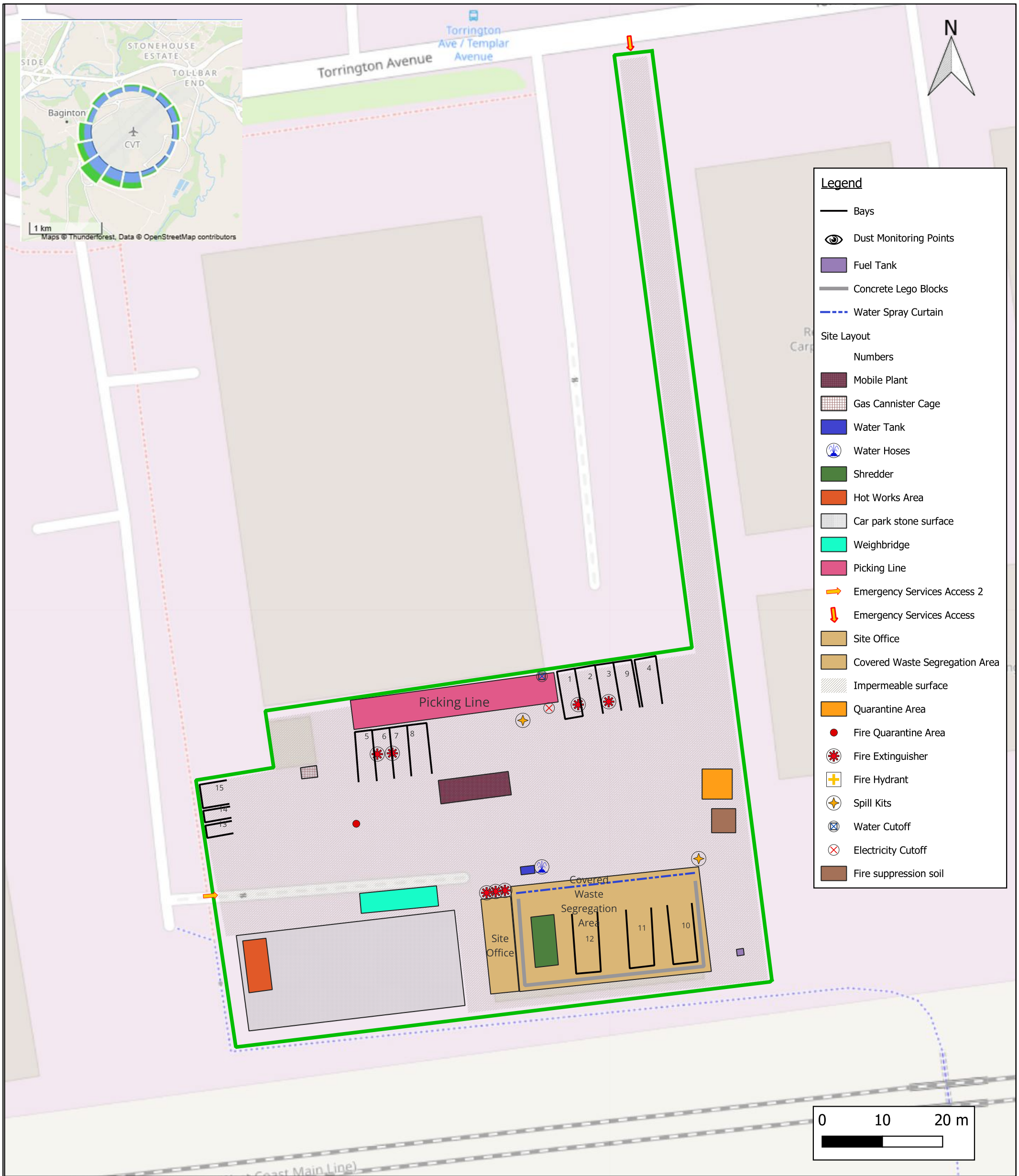


Drawings

Drawing No. 25/008a 005 FPP Site Layout Plan

Drawing No. 25/008a 003 Sensitive Receptor Plan

Drawing No. 25/008a 004 Drainage Plan V2



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Operator: Lakeside MRF Limited
 Site Address: Coventry Recycling Facility
 Templar Avenue
 Coventry
 CV4 9AP

Drawing: 25/008a 005 FPP Site Layout Plan

Scale 1:600 @A3

Drawn by: VC Created: 28th August 2025

Version Control:
 10/10/2025 V2 moved weighbridge and hotworks
 23/10/2025 V3 Added shredder
 09/03/2026 V4 Bays drawn to scale, Waste table updated, quarantine area added, legend updated.
 WEEE, Asbestos, and Tyres added.

Number	Waste Type	Container	Dimensions	PileVolume	FPP Vol	Duration
1	Metal	Bay	8m x 3m x 3m	48m ³	300m ³	3 months
2	Plasterboard	Bay	8m x 3m x 3m	48m ³	N/A	N/A
3	Inert Soil/concrete	Bay	8m x 3m x 3m	48m ³	N/A	1 week
4	POPS Waste	bay	8m x 3m x 3m	48m ³	300m ³	1 week
5	Metal	Bay	8m x 3m x 3m	48m ³	450m ³	3 months
6	Wood	Bay	8m x 3m x 3m	48m ³	300m ³	3 months
7	Plastic	Bay	8 x 3m x 3m	48m ³	300m ³	3 months
8	uPVC Frames	Bay	8m x 3m x 3m	48m ³	300m ³	3 months
9	Residual Waste	Bay	8m x 3m x 3m	48m ³	300m ³	1 week
10	Incoming Mixed Waste	Bay	10m x 4m x 3.6m	144m ³	300m ³	1 week
11	Outgoing shredded waste	Bay	10m x 4m x 3.6m	144m ³	300m ³	28 days
12	Outgoing Shredded Waste	Bay	10m x 4m x 3.6m	144m ³	300m ³	28 days
13	WEEE	12 yard Skip	3.7m x 1.8m x 1.7 m	11m ³	n/a	3 months
14	Asbestos	12 yard skip	3.7m x 1.8m x 1.7m	11m ³	450m ³	3 months
15	Tyres	Bay	4m x 4m x 4m	36m ³	300m ³	3 months

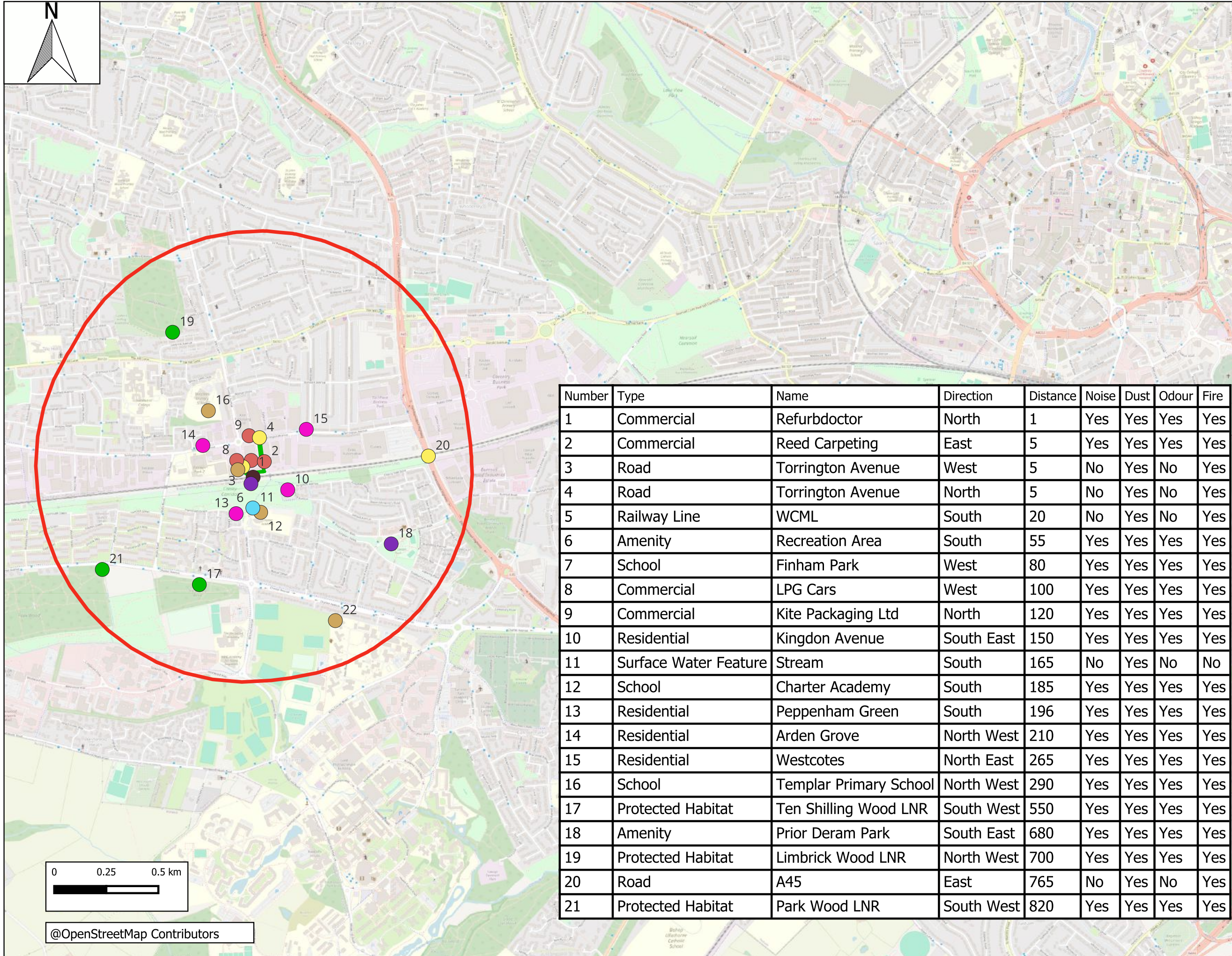
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Client: Lakeside MRF Ltd

Sensitive Receptors Plan

Reference: 25/008a 003

Coventry Recycling Facility,
Templar Avenue,
Off Torrington Avenue,
Coventry,
CV4 9AP

Scale: 1:17,000

26th August, 2025

Created by: VC

Number	Type	Name	Direction	Distance	Noise	Dust	Odour	Fire
1	Commercial	Refurbdoctor	North	1	Yes	Yes	Yes	Yes
2	Commercial	Reed Carpeting	East	5	Yes	Yes	Yes	Yes
3	Road	Torrington Avenue	West	5	No	Yes	No	Yes
4	Road	Torrington Avenue	North	5	No	Yes	No	Yes
5	Railway Line	WCML	South	20	No	Yes	No	Yes
6	Amenity	Recreation Area	South	55	Yes	Yes	Yes	Yes
7	School	Finham Park	West	80	Yes	Yes	Yes	Yes
8	Commercial	LPG Cars	West	100	Yes	Yes	Yes	Yes
9	Commercial	Kite Packaging Ltd	North	120	Yes	Yes	Yes	Yes
10	Residential	Kingdon Avenue	South East	150	Yes	Yes	Yes	Yes
11	Surface Water Feature	Stream	South	165	No	Yes	No	No
12	School	Charter Academy	South	185	Yes	Yes	Yes	Yes
13	Residential	Peppenhams Green	South	196	Yes	Yes	Yes	Yes
14	Residential	Arden Grove	North West	210	Yes	Yes	Yes	Yes
15	Residential	Westcotes	North East	265	Yes	Yes	Yes	Yes
16	School	Templar Primary School	North West	290	Yes	Yes	Yes	Yes
17	Protected Habitat	Ten Shilling Wood LNR	South West	550	Yes	Yes	Yes	Yes
18	Amenity	Prior Deram Park	South East	680	Yes	Yes	Yes	Yes
19	Protected Habitat	Limbrick Wood LNR	North West	700	Yes	Yes	Yes	Yes
20	Road	A45	East	765	No	Yes	No	Yes
21	Protected Habitat	Park Wood LNR	South West	820	Yes	Yes	Yes	Yes

Legend

Sensitive Receptors

- Amenity
- Commercial
- Protected Habitat
- Rail Line
- Railway Line
- Residential
- Road
- School
- Surface Water Feature

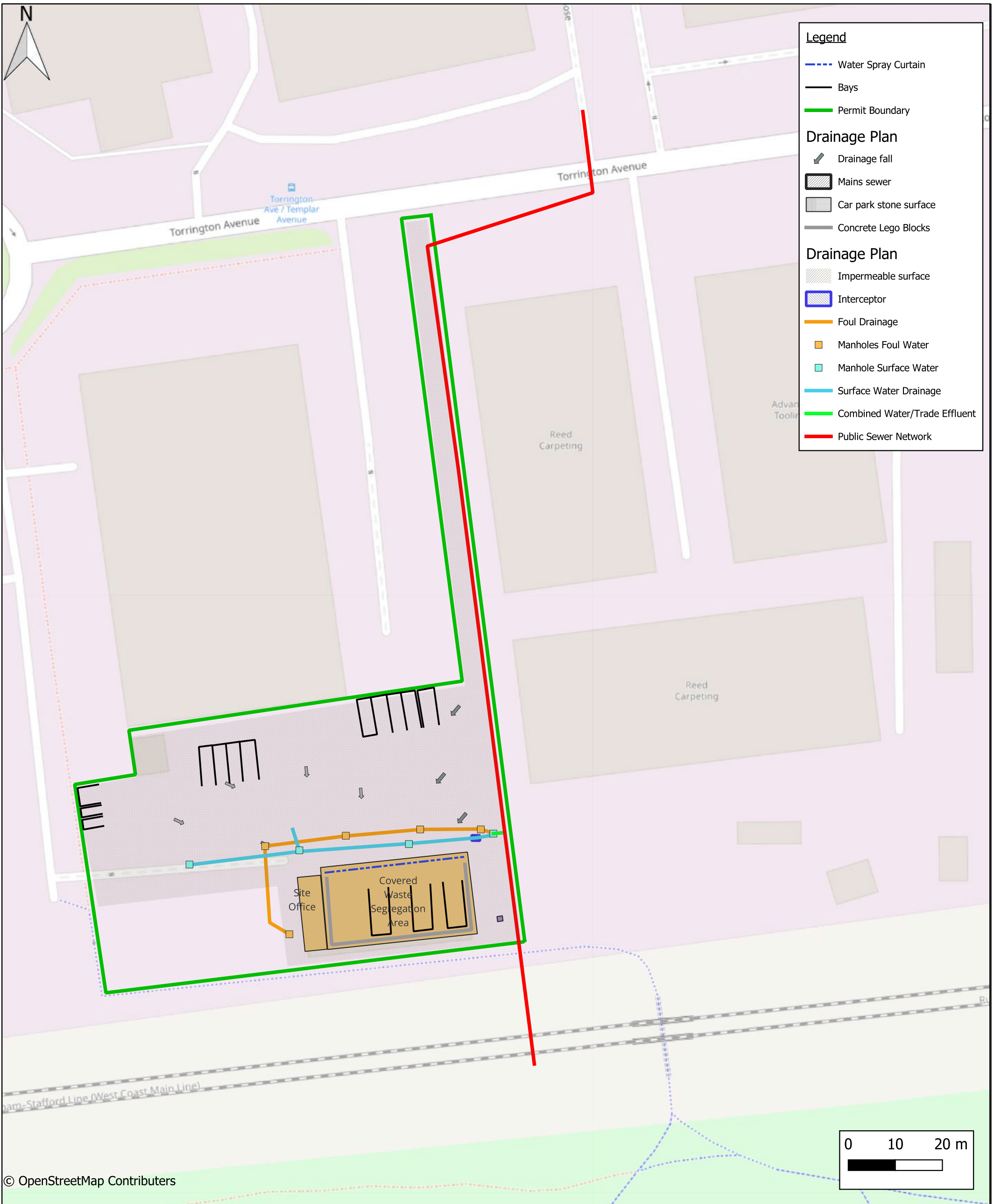
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Lakeside MRF Limited
 Coventry Recycling Facility
 Templar Avenue
 Coventry
 CV4 9AP

Drawing: 25/008a 004 Drainage Plan
 Version:3

Scale 1:750 @A3

Drawn by: VC
 Date: 28th August 2025
 Amendments: 06/01/2025 Changes to drainage layout following drainage survey.
 09/03/2026: Changes to site layout for bays.

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Appendix 1

Environmental Training Checklist

Environmental Training Checklist

Purpose: To provide information on the training required for each member of staff, dependent upon the role of that member of staff.

Role	Reference to Training Material	Main Topics to Cover
Site Operative (Drivers)	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling	Waste Carriers Licences. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Understanding non-permitted waste and waste information. Rejecting loads.
	3 Site Management 3.2 Refuelling of Plant and Equipment	How to refuel vehicles.
	5 End of Waste 5.1 Product Storage and Handling 5.2 Removal of Products	Understanding what is included on delivery documentation and when to issue this (reference Form No. 5.2a). Understanding when Waste Transfer Notes are not required. Classification of waste in accordance with WM3 Guidance
	6 Emergency Provisions 6.1 Environmental Accidents / Incidents 6.2 Near Miss Reporting 6.3 Spill Response	Reporting of any environmental accidents / incidents or near misses. Reporting and dealing with spillages.
Site Operative (General)	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling	Waste Carriers Licences. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Rejecting loads. Storage of construction demolition waste.
	3 Site Management 3.1 Fuel and Oil Storage 3.2 Refuelling of Plant and Equipment 3.3 Maintenance 3.4 Housekeeping 3.5 Wheel Washing 3.6 Site Security 3.7 Recycling Operations 3.8 Removal of Waste	How to refuel vehicles. Schedule for maintenance checklist and completing maintenance checklists. Reporting of infestations and general site tidiness. Reporting of unauthorised access / break-ins and what to do in the event of an alarm. How to remove waste from the Site. Operation of the Wheel Washing facilities

Role	Reference to Training Material	Main Topics to Cover
	4 Environmental Protection 4.1 Dust, Fibres and Particulates 4.2 Mud and Debris 4.3 Noise and Vibration Control 4.4 Odour 4.5 Surface Water Management	Mitigation / protection measures for dust, mud, noise, and odour. Reporting complaints. Awareness of basic surface water management.
	5 End of Waste 5.1 Product Storage & Handling 5.2 Removal of Product 5.4 WRAP Sampling and Testing 5.5 WRAP Non-Conformance	Correct storage and handling of products How to correctly sample stockpiles and send samples off for appropriate testing. Understand different products require different testing. Actions to be taken when products are not conforming to requirements of a product. Storage of recycled aggregate
	6 Emergency Provisions 6.1 Environmental Accidents/ Incidents 6.2 Near Misses 6.3 Spill Response 6.5 Utility / Equipment Failure 6.6 Fire 6.7 Emergency and Abnormal Conditions	Reporting of any environmental accidents / incidents or near misses. Recording of complaints. Reporting and dealing with spillages. Locations of shut offs and what to do in the event of failure(s). What to do in the event of a fire.

Weighbridge Operator	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling	Waste Carriers Licences. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Rejecting loads. Storage of construction demolition waste.
Site Manager (Training required in addition to above)	1 Implementation 1.1 Environmental Training 1.2 Roles and Responsibilities 1.3 Reviewing Documentation 1.4 Compliance with Legal and other Requirements 1.5 EMS Schedule 1.6 Communication 1.7a Environmental Policy	Training requirements and staffing structure. Attendance requirements of Technically Competent Managers (TCM's) and recording of attendance. Delegating responsibilities during leave and TCM attendance. Reviewing the development of cleaner technologies and their applicability to Site operations. Reviewing supporting documentation in EMS to ensure they are up to date. Awareness of legal responsibilities.
	2 Waste Acceptance 2.1 Waste Acceptance 2.2 Waste Classification 2.2.1 Waste Sampling 2.3 Waste Rejection 2.4 Waste Storage and Handling	Analysis of site investigation / waste information and further responsibilities for accepting and rejecting waste. Classification of waste in accordance with WM3 Guidance. Storage restrictions and requirements and compliance with restrictions.
	3 Site Management 3.1 Fuel and Oil Storage 3.3 Maintenance 3.4 Housekeeping 3.5 Wheel Washing 3.6 Site Security 3.7 Recycling Operations 3.8 Removal of Waste 3.9 Manufactured Soils	Locations of fuel and oil and ensuring substances are stored and handled as per requirements. Overseeing and regulating maintenance checklists. Receiving reports of infestation and resolving issues i.e., employing relevant contractors. Receiving reports of unauthorised access and undertaking the relevant actions. Understanding and regulating recycling operations. Overseeing the removal of waste from the site. Operation of wheel cleaning facilities Requirements for producing soil products.
	4 Environmental Protection 4.1 Dust, Fibres and Particulates 4.2 Mud and Debris 4.3 Noise and Vibration Control 4.4 Odour 4.5 Surface Water Management	Recording and dealing with complaints. Managing dust, mud, noise, vibration, odour, and surface water. Implementation of the Dust Management Plan.
	End of Waste 5.1 Product Storage & Handling 5.2 Removal of Product	Storage requirements and management of aggregate products Undertaking meetings to discuss the review of the WRAP Quality Manual. Determining and undertaking reviews of the WRAP Quality Manual.

	5.3 WRAP Review	
	6 Emergency Provisions 6.1 Environmental Accidents/ Incidents 6.2 Near Misses 6.3 Spill Response 6.4 Flood Management 6.5 Utility / Equipment Failure 6.6 Fire Prevention 6.6.1 Control of Causes of Fire 6.7 Reducing the Impact of a Fire 6.7.1 Fire Detection and what to do 6.7.1a Fire Drill Checklist 6.7.2 Fire Suppression and Containment 6.7.3 Recovery After a Fire 6.8 Emergency and Abnormal Conditions	Acting on / dealing with environmental accidents / incidents appropriately and recording the actions taken. Implementing Accident Management Plan and Contingency Plan. Recording and resolution of complaints. Reviewing near misses in relation to the updating of mitigation within procedures and supporting documentation. Overseeing the cleaning up of spillages. Required actions in the event of a flood. Ensuring equipment is maintained and management of staff in response to a failure. Managing active firefighting operations. How to recover if a fire occurs.
	7 Reporting 7.1 Waste Returns 7.2 Notifications to the EA	Completing and submitting Waste Returns. When and how to notify the Environment Agency.



Appendix 2

Fire Procedures

Procedure No. 6.6 Fire Prevention**V.1 February 2025***Purpose: To ensure the likelihood of an outbreak of fire on Site is reduced.*

	RESPONSIBLE PERSON	RECORD
1. Implementation of EMS procedures will minimise the occurrence of fire on Site including the following:	All	Procedure No. 1.1 Environmental Training, Awareness and Competence
<ul style="list-style-type: none"> • Trained staff completing waste operations. • Implementing the Waste Acceptance Procedure reduces the risk of receiving unacceptable waste onto Site. • Unauthorised wastes are rejected in accordance with the Waste Rejection procedure. • Smoking is not authorised in waste storage and treatment areas. • Fuels and oils are stored and handled appropriately. • Plant and equipment will be maintained and services in accordance with manufacturer guidelines by competent staff or contractors. • Improvements and actions identified from near miss investigations are implemented. • Effective management of common causes of fire which can occur on Site. Common causes of fire are listed in Procedure No. 7.6.1 Control of Causes of Fire. • Fire Watches are completed by trained staff on plant, equipment, vehicles and combustible stockpiles / wastes. This is completed during and at the end of operational hours. • Fire Watches and temperature checks are completed by Site Management wastes stored on Site. 		Procedure No. 2.1 Waste Acceptance Procedure No. 2.3 Waste Rejection Procedure No. 2.4 Waste Storage and Handling Form No. 2.4.1a Waste Storage Plan Procedure No. 3.1 Fuel and Oil Storage Procedure No. 3.2 Refuelling Plant and Equipment Procedure No. 7.2 Near Miss Reporting Procedure No. 7.6.1 Control of Causes of Fire Procedure No. 7.7.1 Fire Detection and What To Do

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Procedure No. 6.6.1 Control of Causes of Fire**V.1 February 2025***Purpose: To identify causes of fire on the Site and how these are controlled to minimise fire risk.*

	RESPONSIBLE PERSON	RECORD
1. Potential causes of fire on Site are: <ul style="list-style-type: none"> • Arson • Plant and equipment failure • Electrical faults including damaged or exposed electrical cables • Discarded smoking materials • Hot exhausts • Ignition sources • Leaks and spillages • Build-up of loose combustible waste, dust or fluff • Reactions between wastes • Waste acceptance and deposited hot load • Hot or dry weather • Neighbouring businesses • Prolonged waste storage 		
<u>Arson</u>		
2. The Site has security measures in place and actions for when security is breached. Security measures are maintained to prevent breaches in security and the risk of arson from unauthorised access.	All	Procedure No. 3.5 Site Security Procedure No. 3.3 Maintenance
<u>Plant and Equipment</u>		
3. Plant and Equipment are only used by trained staff.	Site Operative	Procedure No. 1.1 Environmental Training, Awareness and Competence
4. Plant and equipment are subject to planned preventative maintenance and serviced per manufacturer guidelines. Records of preventative maintenance and servicing are retained by Lakeside MRF Ltd.	Site Manager	Procedure No. 3.3 Maintenance
	Site Operative	Procedure No. 3.4 Housekeeping, Litter, Pest and Vermin Control
5. Plant and Equipment may be cleaned when cool to prevent accumulation of grease, oil, fuels, dust, and fluff.		
6. Any maintenance or hot works on mobile plant are completed outdoors.	Site Operative	Procedure No. 3.3 Maintenance

Electrical faults including damage or exposed electrical cables

7. Any electrical works are completed by a suitably qualified person. Competency and other records relating to electrical works are retained by Lakeside MRF Ltd. Site Manager

Discarded smoking materials

8. No smoking is permitted in waste storage and treatment areas. Smoking is only permitted in the designated smoking area by the Site entrance.

Hot exhausts

9. Fire Watches are completed on the plant and equipment that are in use during operational hours. Fire Watches identify dust settling of hot exhausts and engine parts. Site Operative
10. An additional Fire Watch is completed at the end of operational hours to identify any hot plant and equipment and dust settling on hot exhausts and engine parts. Site Manager

Ignition sources

11. No vehicles will be parked in waste storage areas.
12. No Hot Works are completed on mobile plant within waste storage and treatment areas. This is completed outdoors.

Leaks and spillages

13. Leaks and Spillages have the potential to spread fire across the Site. No liquid wastes are accepted on Site. All Procedure No. 2.1 Waste Acceptance
14. Plant and equipment are subject to planned preventative maintenance and serviced per manufacturer guidelines which reduces the risk of leaks and spillages. Form No. 3.3a Inspection Checklist

- | | |
|---|--|
| 15. The quantity of fuel stored on Site is subject to the size of the tank. The tank is subject to integrity checks on the Inspection Checklist. Fuel, oil, and other substances are stored in accordance with Procedure No. 3.1 Fuel and Oil Delivery and Storage. Only trained staff will refuel plant and equipment. | Procedure No.
3.1 Fuel and Oil
Delivery and
Storage |
| | Procedure No.
3.2 Refuelling of
Plant and
Equipment |
| 16. In the event of a leak or spillage, the spill response procedure will be followed. | Procedure No.
7.3 Spill
Response |

Build-up of loose combustible waste, dust or fluff

- | | | |
|--|----------------|--|
| 17. Stockpiles will be inspected on a weekly basis to identify when all combustible waste in a storage area has been removed. Once empty, the storage area will be cleaned to remove any residual waste / dust / fluff | Site Operative | |
| 18. Implementation of the Housekeeping procedure ensures the Site is tidy. | All | Procedure No.
3.4
Housekeeping,
Litter, Pests and
Vermin Control |

Reactions between wastes

- | | | |
|--|----------------|--|
| 19. Authorised wastes accepted onto Site are unlikely to be reactive. Implementation of strict waste acceptance criteria will ensure that no waste types which, when mixed, would create a 'reaction' e.g., explosion are accepted on to the Site. | Site Operative | Procedure No.
2.1 Waste
Acceptance |
| 20. Wastes are stored separately by waste type and grade. | | Drawing No.
24/022d 001
Site Layout Plan |

Waste acceptance and deposited hot loads

- | | | |
|---|----------------|--|
| 21. Waste received on Site has been subject to checks implemented through the Waste acceptance procedure. | Site Operative | Procedure No.
2.1 Waste
Acceptance |
| 22. Hot Loads are managed with the Fire Suppression and Containment Procedure. | All | Procedure No.
7.7.2 Fire
Suppression
and
Containment |

Hot and dry weather

- | | |
|--|--------------|
| 23. In the event of prolonged hot weather, where possible, combustible waste will be stored out of direct sunlight and under a canopy. If this is not possible, combustible waste piles will be turned daily to ensure any localised warming within the waste is dissipated quickly. | Site Manager |
|--|--------------|

Prolonged Waste Storage

24. Combustible wastes are stored in accordance with the Waste Storage Plan.

Site Manager

Form No. 2.4.1a
Waste Storage
Plan

25. The Site operates a “first in first out” approach to waste storage where possible. This means that wastes are removed from Site as soon as possible. This shortens the duration of waste storage and reduces fire risk. Combustible waste stored on the Site will be stored for a maximum of 3 months.

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Procedure No. 6.7 Reducing the Impact of a Fire

V.1 February 2025

Purpose: To reduce the impacts of a fire on the Site if one were to occur.

	RESPONSIBLE PERSON	RECORD
1. The Site reduces the impact of fire by:	All	
<ul style="list-style-type: none"> • Rejecting unacceptable combustible waste. • Combustible contravening waste is handpicked and stored separately. • Early detection measures, including Fire Watches and temperature checks, allow for quicker use of suppression measures. • Reducing fire spread by housekeeping and maintaining separation distances. • Use of inert materials for suppression to reduce generation of firewater. 		<p>Procedure No. 2.1 Waste Acceptance</p> <p>Procedure No. 2.3 Waste Rejection</p> <p>Procedure No. 3.4 Housekeeping, Litter, Pests and Vermin Control</p> <p>Procedure No. 7.7.2 Suppression and Containment of Fire</p>

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Procedure No. 6.7.1 Fire Detection and What to do**V.1 February 2025**

Purpose: To ensure measures are taken to detect a fire on the Site and provide information on what to do in the event of a fire.

	RESPONSIBLE PERSON	RECORD
1. This procedure outlines fire detection measures used across different sections of the Site and actions to be taken following the detection of a fire.		
2. Fires will be detected by identifying visual (smoke and vapour etc), increased heat and burning odours. Upon detection of a fire, the Site Manager will be notified immediately.		
3. Appropriate action will be taken to ensure the affected area is isolated and that vehicles and staff are prevented from entering the area.		
4. Information regarding fire suppression and containment can be found in Procedure No. 7.7.2 Fire Suppression and Containment.		Procedure No. 7.7.2 Fire Suppression and Containment
5. In the event of a fire, it may be necessary to divert incoming waste loads to another facility so as not to disrupt the access and egress of the emergency services.	Site Manager	Appendix A.8 Contingency Plan
<u>Waste Reception Area</u>		
6. Fires in the waste reception area may be from Hot Loads. Hot Loads are managed in accordance with Procedure No. 7.7.2 Fire Suppression and Containment.	Site Operative	Procedure No. 7.7.2 Fire Suppression and Containment
7. A Fire Watch will be completed to monitor any signs of excess heat or fire beyond identified Hot Load.	Site Operative	
8. Staff and any drivers will evacuate the area. If a full site evacuation is needed, people will assemble at the emergency assembly point.	All	
<u>Waste Operational Areas</u>		
9. The fire alarm will be sounded to alert staff of a fire. If needed, bell or horn will also be used to inform staff of a fire.		
10. Shutdown and make safe any plant or equipment that is in use.	Site Operative	
11. Staff and any drivers will evacuate the area. If a full site evacuation is needed, people will assemble at the emergency assembly point.	All	

Offices

12. The fire alarm will be sounded to alert staff of a fire.
13. Staff and any drivers will evacuate the area. If a full site evacuation is needed, people will assemble at the emergency assembly point.

Fire Drill

14. A fire drill will be completed on a six-monthly basis as a minimum. This drill will go through what is to be done in the event of a fire and will typically include:
 - Fire detection.
 - Fire suppression.
 - Use of the Fire Quarantine Area.
 - Firewater containment.

Form No. 7.7.1a
Fire Drill

Form No. 6.7.1a Fire Drill Checklist**V.1 February 2025**

Item	Aspect to be Checked	Checked?	Notes
EMS training	All staff members trained with regard to fire procedures.		
Reducing the impact of a fire	Waste stored within bays up to a maximum height that is 1m below the height of the bay.		
	Waste stored in controlled volumes and controlled stockpiles		
	Space available for access by emergency services.		
Fire detection	Assembly points defined and easily accessible.		
	Fire bell accessible and working.		
	CCTV cameras operational.		
Suppression of a fire	Fire extinguishers and hoses in place and in working order		
Firewater Management	Drains unobstructed		

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Procedure No. 6.7.2 Fire Suppression and Containment**V.1 February 2025**

Purpose: To ensure that fires are suppressed, and steps are taken to reduce the spread of fires.

	RESPONSIBLE PERSON	RECORD
1. Procedure No. 7.7.1 Fire Detection and What To Do should be followed in the event of a fire occurring on the Site.		Procedure No. 7.7.1 Fire Detection and What to do
<u>Hot Loads</u>		
2. A Hot Load is waste that catches fire, smoulders, or spontaneously combusts within the delivering vehicle during transfer to the Site.		
3. Drivers with Hot Loads report this to the Site Manager upon arrival to the Site. No Hot Loads will be accepted on Site.		
4. Some Hot Loads are only discovered when inspected during offloading.		
5. The vehicle containing the hot load will be moved (if safe to do so) to an appropriate area for tipping.		
<u>Site Fires</u>		
6. Fire extinguishers will be used as a first response measure in the event of a fire, or to extinguish smaller fires before a larger problem arises.	All	Procedure No. 1.1 Environmental Training, Awareness and Competence
7. Fire extinguishers are located in signed areas around the site.		
8. Burnt, smouldering or burning waste will be moved to the Fire Quarantine Area where possible, using mobile plant/other equipment, to reduce the risk of the fire spreading. Burning waste is suppressed in the Fire Quarantine Area. Access for the Fire and Rescue Services will be considered when relocating burning and burnt waste.	Site Manager	Drawing No. 24/022 001 Site Layout Plan
9. Water or inert materials will be used to suppress fires by staff. Staff are trained in using water hoses and inert material to suppress fire.	Site Operative	Procedure No. 1.1 Environmental Training, Awareness and Competence
10. Staff not trained in using fire extinguishers or suppression equipment will evacuate the Site to the assembly point.	All	
11. If required, the Fire and Rescue Services will be contacted.	Site Manager	
12. For larger fires, neighbouring premises / residents may need to be contacted.		

- 13. If required, the Fire and Rescue Service will use an offsite fire hydrant as additional water supply for suppression. Only the Fire and Rescue Services are allowed to use the offsite hydrant.
- 14. To reduce the likelihood of reignition, burnt or burning waste will be segregated from unburnt waste.

Containment of Firewater

- 15. The use of inert materials to suppress fires will reduce the amount of firewater generated.
- 16. The Site is designed for water to pool on the impermeable surfacing and not escape the Site boundary.
- 17. Firewater will be removed from Site by a suitably licensed contractor

Procedure No.
6.5 Surface
Water
Management

Site Manager

Procedure No.
7.7.3 Recovery
After a Fire

Procedure No. 6.7.3 Recovery after a Fire**V.1 February 2025***Purpose: To ensure that appropriate actions are taken subsequent to a fire*

	RESPONSIBLE PERSON	RECORD
1. Ensure that the fire is completely extinguished, that there is no risk of re-ignition and that the burnt materials are isolated. Burnt wastes and materials remain segregated and are checked to ensure they are a cool temperature.	Site Manager	
2. The risk of secondary fire will be assessed. After deciding there is no feasible chance of further fire, the Site will be cleaned up and reopened.		
3. Make necessary arrangements to ensure that no further waste is accepted into that area.	All	
4. Any burnt materials and any generated fire water will be dispatched to a suitably licensed facility. These wastes may be subject to waste classification to identify any hazardous properties or/and determine the most applicable LoW Code. Non-hazardous wastes will be dispatched with a Waste Transfer Note and hazardous waste will be dispatched with a Consignment Note.		Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling Waste Transfer Note Consignment Note
5. For waste classification on burnt material and firewater, a minimum of three representative samples will be collected. If there is a significant amount of burnt material or firewater, an increased number of samples will be collected.	Site Manager	
6. All fires will be investigated to determine the cause and minimise the risk of reoccurrence. The findings of the investigation will be recorded on an Accident / Incident form and shared with staff.	Site Manager	Form No. 7.1b Accident / Incident Form
7. If the investigation identifies further measures to reduce fire reoccurrence the Environmental Accident Management Plan will be reviewed and updated.	Site Manager	Appendix A,3 Environmental Accident Management Plan
8. Report the fire to the Environment Agency. The fire may also need to be reported to HSE and the Local Authority.	Site Manager	Form 8.2a Notification Form Form No. 7.1a Key Contacts

9. Complete a Site Condition Report Part 2 Form about the fire.

Site Manager

Procedure No.
7.1
Environmental
Accidents /
Incidents /
Complaints

Form No. 7.1d
Site Condition
Report Part 2

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Procedure No. 6.8 Emergency and Abnormal Conditions**V.1 February 2025**

Purpose: To ensure all staff are prepared in the event of an emergency or abnormal condition.

	RESPONSIBLE PERSON	RECORD
1. The Site has a Contingency Plan in place for emergency or abnormal conditions including breakdowns, unexpected releases, momentary stoppages, start-up, enforced shutdowns and any other change in normal operations i.e., extreme weather. The plan will minimise the impact on the environment and business continuity.		Appendix A.8 Contingency Plan

Contingency Plan

2. For all emergency and abnormal conditions, the Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.	Site Manager	Appendix A.8 Contingency Plan
3. For some emergency and abnormal conditions, the Site Manager will obtain incident specific information before deciding if operations can continue.	Site Manager	Appendix A.8 Contingency Plan
4. For some emergency and abnormal conditions, information can be obtained in advance allowing the Site Manager to make a proactive, informed decision about managing Site operations and implementing any control measures to facilitate the continuation of Site Operations.	Site Manager	Appendix A.8 Contingency Plan
5. Some of the emergency and abnormal operations will require Government regulator e.g., the Environment Agency and HSE involvement.		Appendix A.8 Contingency Plan
6. The Contingency Plan will be shared with relevant parties as necessary.	Site Manager	Appendix A.8 Contingency Plan

Preparation for an Emergency or Abnormal Conditions

7. Key contacts in the event of an emergency or abnormal condition can be found in Form No. 6.1a Key Contacts.		Form No. 6.1a Key Contacts
8. Lakeside MRF Ltd retains customer contact details so they can communicate with them in the event of emergency or abnormal conditions.		Appendix A.8 Contingency Plan
9. Staff and customers will be made aware of any planned shutdowns in advance.	Site Manager	

During an Emergency or Abnormal Condition

10. Identified actions in the contingency plan will be followed.		Appendix A.8 Contingency Plan
11. If an abatement system was to have any downtime or an abnormal event occurred, then operations will be suspended until the Site is back under control.	Site Manager	

12. Any plant/equipment in use is made as safe as possible. For example, plant/equipment is switched off if safe to do so. Site Manager

Recovery after an Emergency or Abnormal Condition

13. The Site will only be re-entered once deemed safe by the Site Manager. Site Manager
14. The insurance provider may be contacted depending on the severity of the impact. Director Site Manager Form No. 6.1a Key Contacts
15. A suitably licensed contractor will remove any debris there may be on Site Director Site Manager
16. If documentation is lost or destroyed it should be replaced, there should be back-up copies in accordance with the Site Security Procedure. Director Site Manager Procedure No. 3.6 Site Security

After Incident Report

17. After the emergency or abnormal condition, the Site Manager will complete an after-incident report. This internal document will help strengthen response to an emergency or abnormal condition in the future and improve business continuity. All Procedure No. 1.1 Training, Awareness and Competence
Appendix No. A.3 Environmental Accident Management Plan
Appendix A.8 Contingency Plan



Appendix 3

Waste Acceptance Procedures

Procedure No. 2.1 Waste Acceptance**V2 March 2026**

Purpose: To ensure that all waste imported on to the Site acceptable under the conditions of the Environmental Permit.

	RESPONSIBLE PERSON	RECORD
<u>Environmental Permit and Waste Codes</u>		
1. The Environmental Permit contains the list of waste types that are permitted to be accepted at the Site. A table containing the codes and descriptions of waste types that are permitted on this site is included at the end of this procedure, see Table 1 Permitted Waste Types.	All	Table 1 Permitted Waste Types Appendix B.1 Environmental Permit
2. The following waste must not be accepted or stored on this Site: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders, or loose fibres. • Wastes that are in a form which is either sludge or liquid. 		
3. If unsure whether to accept a load onto the Site, consult Table 1, and then the Site Manager if necessary.		
4. Unsuitable wastes are rejected in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection
5. The total quantity of waste accepted at the site shall be less than 65,000 tonnes a year.	Site Manager	Appendix B.1 Environmental Permit
6. The Site does not typically experience seasonal variation in incoming waste material.		
<u>Waste Pre-Acceptance</u>		
7. Following a customer enquiry, information about the waste is requested from the waste producer.	Site Manager	Form No. 2.1a Waste Information
8. This information is recorded on the Waste Information Form and the information reviewed to assess if the waste is acceptable or not.		
9. Review of the information in the Waste Information Form will determine the need for sampling / testing / Hazardous Waste Assessment.	Site Manager	Procedure No. 2.2 Waste Classification Form No. 2.1a Waste Information
10. A judgement should be made as to the necessity to obtain comprehensive information at this stage. If the source of the waste is not likely to be contaminated, then it may not be necessary to obtain further information or hazardous waste assessment on the waste. If the source of the waste is likely to be contaminated, then further information and/or a hazardous waste assessment should be requested.		
11. If required, a Hazardous Waste Assessment (based on WM3 Guidance) is completed in accordance with the Waste Classification Procedure.		Procedure No. 2.2 Waste Classification

	RESPONSIBLE PERSON	RECORD
12. The information requested from customers at the pre-acceptance stage is re-assessed on an annual basis to ensure it is preventing unsuitable wastes being sent to the Site.	Site Manager	
13. Pre-acceptance information requirements will be reviewed when: <ul style="list-style-type: none"> • There are changes in the waste. • There are changes in the process generating the waste. • Received waste does not conform to pre-acceptance information provided. 		
14. The waste will not be accepted on to the Site if the Hazardous Waste Assessment classifies the waste to be hazardous.		
<u>All Vehicles on Site</u>		
15. Third-party hauliers used for transporting waste must be an Upper Tier Waste Carrier registered with the Environment Agency.	Site Operative	Waste Transfer Note
16. Copies of third-party haulier registrations certifications will be retained in the Site office.	Site Operative	
17. Periodic checks should be completed on registration certificates of third-party hauliers to ensure they remain valid. If the registration has expired, a copy of the renewed registration will be obtained.	Site Operative	
<u>Acceptance of Waste onto the Site</u>		
18. All incoming vehicles will provide the accompanying Waste Transfer Note to the Site Operative unless a Season Waste Transfer Note has been provided.	Site Operative	Waste Transfer Note
19. A season waste transfer note is a document that covers transfers for up to twelve months. Season waste transfer notes may be used for wastes from a given site if it is well characterised or a regularly generated waste.		
20. The Site Operative will complete the section relating to transfer of waste and will return the waste transfer note to the driver keeping a copy of the WTN for their own records.		
21. Unless a season WTN has been provided, a Waste Transfer Note for every load is obtained from the driver and the Waste Transfer Note is checked to ensure it contains the following: <ul style="list-style-type: none"> • Vehicle registration and driver's name and signature. • Waste haulier name and valid waste carrier's registration number. • Name, address (of source site) and signature of the transferor. • Name, address (of destination site) and signature of the person receiving the waste (transferee). • Permit number or exemption reference of the Site Description of waste including waste type, waste source and waste containment. • Amount of waste (tonnes). • List of Waste (LoW) code. • SIC Code of the waste holder using SIC Codes (2007). • Date and time of waste transfer. • Waste Transfer Note number. • Confirmation that the Waste Hierarchy has been considered. 	Site Operative	Waste Transfer Note
22. Loads will be visually checked by the Site Operative at the Site Office prior to offloading to ensure that an accurate written description and List of Waste code has been provided on the Waste Transfer Note.	Weighbridge Operative	Waste Transfer Note

	RESPONSIBLE PERSON	RECORD
23. After initial checks by the Site Operative, loads are then directed for tipping, inspection, and stockpiling in the offloading area.	Site Operative	
24. Each load is visually inspected during tipping by Site Operatives. Inspections are made to check the accuracy of the waste description provided on the Waste Transfer Note again and to identify any contravening waste types.	Site Operative	
25. The Site Manager shall be immediately informed if there are discrepancies with the load or its paperwork. This includes any identified combustible wastes such as lithium-ion batteries.	Site Operative	
26. If the load is not acceptable under the Environmental Permit, then, it should be rejected from site in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection

Waste Containing Persistent Organic Pollutants (POPs)

27. The following waste types may contain Persistent Organic Pollutants (POPs). <ul style="list-style-type: none"> Waste electrical and electronic equipment (WEEE) e.g., photocopiers, printers, cables. Waste upholstered domestic seating e.g., sofas, armchairs, office furniture. 		
28. If you are unsure if the waste types you accept onto Site contain POPs, you can: <ul style="list-style-type: none"> ask the supplier or manufacturer of the material. test the material yourself to find out the concentration of any POPs in it. get the material analysed by a laboratory. 	Site Manager	
29. A description of the waste to be accepted onto the site is entered in the Waste Information Form during the waste acceptance process.	Site Manager	Procedure No. 2.1 Waste Acceptance Form No. 2.1a Waste Information
30. In the Waste Information Form, waste containing POPs is classified as the following waste codes: <ul style="list-style-type: none"> 20 03 07 – Bulky Waste (e.g., domestic seating) 20 01 34 – Batteries and accumulators 20 01 36 – Discarded electrical and electronic equipment 16 02 14 – Discarded equipment 16 06 04 – Alkaline Batteries 16 06 05 – Other batteries and accumulators 	Site Manager	Form No. 2.1a Waste Information
31. The code 20 03 07 is also used for waste upholstered domestic seating containing POPs where it has been mixed with other waste (not containing POPs).		
32. All reasonable steps shall be taken to avoid mixing POPs waste with other waste during storage, collection, and treatment.	Site Operative	Procedure No. 2.1 Waste Acceptance Procedure No. 2.4 Waste Storage & Handling

	RESPONSIBLE PERSON	RECORD
<u>Compliance Testing</u>		
33. Compliance testing may be carried out on construction / demolition waste accepted on to the Site.	Site Manager	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling Pre-acceptance flow chart Waste Classification flow chart
34. The purpose of compliance testing is to ensure that the information provided during pre-acceptance was representative of the waste received and that the waste is acceptable.	Site Manager	
35. Samples taken from waste piles will be tested at a laboratory to determine the characteristics of the waste and to ensure that the waste is as described on the WTN.	Site Manager	
36. A Hazardous Waste Assessment, in accordance with WM3 Guidance, will be completed using the testing results received from the laboratory. This Hazardous Waste Assessment will classify the waste as non-hazardous or hazardous.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling
37. If a waste sample is found to be classified as hazardous waste, then the corresponding waste pile will be quarantined and removed from the Site in accordance with the Waste Rejection Procedure. The Hazardous Waste Classification Report will ensure that this waste is removed under the correct LoW code.	Site Operative	Pre-acceptance flow chart Waste Classification flow chart
38. Hazardous wastes will be sent to a suitably licensed facility and accompanied by a Hazardous Waste Consignment Note.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling

Records

39. Waste Transfer Notes will be stored for a minimum of two years.	Site Manager	Procedure No. 6.1 Waste Returns
40. Information from the waste transfer notes and consignment notes will be used to provide the necessary data to complete the waste return as required by the Environment Agency.		

Consequences

41. The consequence of not following this procedure may result in unsuitable waste being accepted on to the Site. This may constitute a breach in the conditions of the Environmental Permit, in addition to causing potential contamination of the Site.		
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Appendix 4

Inspection Checklists

Form No. 3.3a Inspection Checklists

V.1 February 2025

Daily Inspection Checklist

Item	Aspects for Inspection	Checked?	Remedial Action	Actioned By
Weather Conditions	Confirm whether conditions have been recorded in the Site Diary.	<input type="checkbox"/>		_____
Litter	Check the vicinity of the Site Office and Weighbridge area for litter.	<input type="checkbox"/>		_____
	Check the waste storage areas for litter.	<input type="checkbox"/>		_____
	Check the waste processing area for litter.	<input type="checkbox"/>		_____
	Check the site boundary (fencing etc.) for litter.	<input type="checkbox"/>		_____
Fire	Complete a Fire watch on plant/equipment. Any evidence of fire/significant heat?	<input type="checkbox"/>		_____
	Complete a Fire watch on combustible waste stockpiles. Any evidence of fire/significant heat?	<input type="checkbox"/>		_____
	Check plant/vehicles 30 minutes after use to ensure they are sufficiently cooled.	<input type="checkbox"/>		_____
Spill Kits	Check that spill kits are available.	<input type="checkbox"/>		_____
Waste Storage	Check that the volume of stockpiles of waste is contained within storage bays.	<input type="checkbox"/>		_____
Roads	Check that the public highway is clear of mud and debris.	<input type="checkbox"/>		_____

Item	Aspects for Inspection	Checked?	Remedial Action	Actioned By
Dust Emissions	Check that there are no significant dust emissions escaping the boundary of the site.	<input type="checkbox"/> Morning		_____
		<input type="checkbox"/> Midday		
		<input type="checkbox"/> Afternoon		
	Conduct a walkaround of the external perimeter of the site to check that there are no significant dust emissions escaping the boundary of the site.	<input type="checkbox"/>		
	Check that the water sprays are operational and have a water supply.	<input type="checkbox"/>		_____
Fuel Storage	Check that the locks are operational.	<input type="checkbox"/>		_____
	Check around the fuel storage tanks and where refuelling takes place for evidence of leakage.	<input type="checkbox"/>		_____
Fugitive Emissions to Air	Check if waste on site is causing an odour.	<input type="checkbox"/>		_____

Date: _____

Completed by: _____

Signature: _____

Weekly Inspection Checklist

Item	Aspects for Inspection	Checked?	Remedial Action	Actioned By
Site Security	Check that the CCTV system is operational.	<input type="checkbox"/>		_____
	Check that the fencing around site perimeter is in good condition.	<input type="checkbox"/>		_____
	Check that the locks for the front gate are working and that there are no signs of corrosion or damage.	<input type="checkbox"/>		_____
	Check that the locks on Site Office are working and that there are no signs of corrosion or damage.	<input type="checkbox"/>		_____
	Check that the locks on all buildings are working and that there are no signs of corrosion or damage.	<input type="checkbox"/>		_____
Waste Storage	Check that the waste storage areas are not overfilled or poorly maintained.	<input type="checkbox"/>		_____
Housekeeping	Check for signs of pest/vermin infestation (flies, rats, birds etc.).	<input type="checkbox"/>		_____

Date: _____

Completed by: _____

Signature: _____

Monthly Inspection Checklist

Item	Aspects for Inspection	Checked?	Remedial Action	Actioned By
Impermeable Surfacing	Check that the site surface is free from cracks, wear, and damage that could allow surface water to escape the site without discharge through the interceptor.	<input type="checkbox"/>		_____
Interceptor and Penstock Valves	Check for petrol or oil being released by the interceptor.	<input type="checkbox"/>		_____
Water Supplies	Check that the mobile water bowser is free from cracks which may result in leaks.	<input type="checkbox"/>		_____
Fire	Check that water hoses are in good condition and free from damage.	<input type="checkbox"/>		_____
Fuel Tanks	Check the integrity of the fuel tanks – there should be no cracks, corrosion, or leaks.	<input type="checkbox"/>		_____
Spill Kits	Check that spill kits are present on the site, ready for use, and fully stocked with contents.	<input type="checkbox"/>		_____

Date: _____

Completed by: _____

Signature: _____

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Form No. 3.3d Action

V.1 February 2025

Description of Item:
Action Required:
Action Completed:
Further Action Required:

Date: _____

Signature: _____

Further Action Completed:

Date: _____

Signature: _____

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Appendix 5

Stock Rotation Forms

Form No 7.6.1a Stock Rotation Form V.3 March 2026

<u>Weekly Stock Rotation Record</u>								
Date:								
Storage Area ID	Storage Area Contents	Maximum Storage Time	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared
Quarantine Area	Contravening waste/ Quarantine	1 week						

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Monthly Stock Rotation Record									
Date:									
Storage Area ID	Storage Area Contents	Maximum Storage Time	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared
Bay 1	Metals	3 months							
Bay 2	Plasterboard								
Bay 3	Inert Soil/Concrete	3 months							
Bay 4	POPS Waste								
Bay 5	Metal	3 months							
Bay 6	Wood								
Bay 7	Plastic	3 months							

Storage Area ID	Storage Area Contents	Maximum Storage Time	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared
Bay 8	uPVC							
Bay 9	Residual Waste	3 months						
Bay 10	Incoming Mixed Waste	3 months						
Bay 11	Outgoing Shredded Waste							
Bay 12	Outgoing Shredded Waste							
Bay 13	WEEE							
Bay 14	Asbestos							
Bay 15	Tyres							

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Annual Stock Rotation Record								
Date:								
Storage Area ID	Storage Area Contents	Maximum Storage Time	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared	Date area cleared
Bay 1	Metals	3 months						
Bay 2	Plasterboard							
Bay 3	Inert Soil/Concrete	3 months						
Bay 4	POPS Waste							
Bay 5	Metal	3 months						
Bay 6	Wood							
Bay 7	Plastic	3 months						

Bay 8	uPVC	
Bay 9	Trommel Fines	3 months
Bay 9	Residual Waste	3 months
Bay 10	Incoming Mixed Waste	3 months
Bay 11	Outgoing Shredded Waste	
Bay 12	Outgoing Shredded Waste	
Bay 13	WEEE	
Bay 14	Asbestos	
Bay 15	Tyres	

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Appendix 6

Contingency Plan

Lakeside MRF Ltd

Contingency Plan

Coventry Recycling Facility
Templar Avenue
off Torrington Avenue
Coventry
CV4 9AP



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Document Control Table

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Change Log

Version	Changes	Produced by	Checked by	Date
1	Original Contingency Plan	Vicky Cawley & Sarah Boatwright	Tracey Westbury	25 September 2025



Contents

1. Introduction	1
2. Potential Hazards, Impacts and Contingency Measures	2



1. Introduction

- 1.1. This Contingency Plan has been produced for waste operations carried out by Lakeside MRF Ltd (Operator) at Coventry Recycling Facility, Templar Avenue, off Torrington Avenue, Coventry, CV4 9AP (Site).
- 1.2. This document has been produced in accordance with Environment Agency guidance '*Develop a management system: environmental permits*' (dated 3rd April 2023) and '*Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities*' (dated 1st August 2023). This document has been produced to meet these requirements and to provide guidance in order to:
 - Ensure compliance with the Environmental Permit and operating procedures during maintenance or shutdown on Site.
 - To minimise the impact of non-operation of associated third-party facilities.
 - Ensure Site storage capacity limits are not exceeded.
 - Minimise the impact on the environment and ensure business continuity, from any breakdowns, enforced shutdowns and any other changes from normal operations.
- 1.3. This Contingency Plan identifies potential events of external and internal disruption and outlines actions that will be implemented when these events occur. It is not possible to include every possible event or scenario but as many as possible potential disruptions have been considered.
- 1.4. The advice included in this Contingency Plan will be implemented on Site by the procedures in the Environmental Management System (EMS).
- 1.5. This Contingency Plan will be shared with relevant parties as necessary, including internal stakeholders (i.e., commercial team), external stakeholders (i.e., regulators) and third-party customers and clients (i.e., Local Authorities).
- 1.6. This Contingency Plan will be reviewed every four years and if a disruption to operations has occurred and the mitigation measure identified was found to be inadequate.



2. Potential Hazards, Impacts and Contingency Measures

Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
Aviation Crash	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Damage to local road network resulting in disruption to incoming and removal of materials.</p> <p>Injury and death to staff.</p>	<p>The Site is not located near an airport. The nearest airport is Coventry Airport and is located 6.8km away. It is considered unlikely for the Site to be impacted by an aviation crash.</p> <p>Aviation incidents are very rare in the UK.</p>	Refer to Note One.
Train or Tram Crash	Damage to local road network resulting in disruption to incoming and removal of materials.	<p>The Site is located 20m north of the West Coast Main Line railway line, so the site would be impacted by a train crash in this location.</p> <p>Trams do not currently operate in this area.</p> <p>There are multiple transport routes connecting the Site to multiple recovery and disposal facilities and customers.</p>	Refer to Note One.
Bridge Collapse or severe road accident	Damage to local road network resulting in disruption to incoming and removal of materials.	<p>The A45 is located approx. 800m east and the M6 around 8km north. Other roads close to the Site include Torrington Avenue, immediately north of the site.</p> <p>There are bridges crossing the railway line close to the Site, located 800m east and 1.8km west.</p> <p>If a bridge were to collapse, it could impact incoming loads and the removal of waste.</p>	Refer to Note Two.



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
Offsite Explosion/Fire	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Damage to local road network resulting in disruption to incoming and removal of materials.</p> <p>Injury and death to staff, third parties and emergency services.</p> <p>Air pollution.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p>	<p>There is a potential that businesses on the industrial estate adjacent to the Site could catch fire as they may handle flammable materials.</p>	<p>Refer to Note Two.</p>
Onsite Fire	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Illness and death of staff and emergency services.</p> <p>Air pollution.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p>	<p>Combustible wastes are managed in accordance with the FPP.</p> <p>There is increased likelihood for damage to Site infrastructure if the fire occurred during non-operational hours.</p> <p>Appendix C Procedures and Forms, Procedure No 5.7 Reducing the Impact of Fire reduces the likelihood of impact from fire.</p> <p>Staff complete fire drills so they are effective at suppressing fires and minimise their environmental impact. This reduces the likelihood of environmental impact from fires.</p>	<p>Refer to Note One.</p>



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
Seismic Activity	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Damage to local road network resulting in disruption to incoming and removal of materials.</p>	There has been no history of significant seismic activity in the area so there is a low likelihood of impact.	The Site has been constructed in line with reasonably foreseeable risks.
Storm Weather and Offsite Flooding	<p>Flooding and inability to use local road network resulting in disruption to incoming and removal of materials.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p>	The Site is located within Flood Zone 1 with a very low of flooding from rivers, seas, or surface water.	<p>See Note Three.</p> <p>Procedure No. 5.4 Flood Management.</p> <p>Appendix A.3 Flood Management Plan.</p>
Onsite Flood	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Flooding and inability to use local road network resulting in disruption to incoming and removal of materials.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p>	The Site is located within Flood Zone 1 with a very low risk of flooding from rivers, seas, or surface water	<p>See Note Three.</p> <p>Procedure No. 5.4 Flood Management.</p> <p>Appendix A.3 Flood Management Plan.</p>
Spillage	Disruption to Site operations due to clearance/remediation works and reduced raw materials stored on Site.	<p>The only liquids stored and handled on Site are fuels.</p> <p>The Site has an impermeable paving with a controlled drainage system. This reduces the likelihood of pollution</p>	The Site has implemented a spill procedure which outlines the actions taken in response to a spillage. This reduces the likelihood of spillage See Appendix C Procedures and Forms, Procedure No 5.3 Spill Response.



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p> <p>Injury to staff.</p>	<p>to land, drains, groundwater, and watercourses in the event of a spillage.</p> <p>The integrity of the Site's surfacing and drainage system is inspected as part of the Maintenance Procedure, see Appendix C Procedures and Forms, Procedure No 3.3 Maintenance.</p> <p>The Site has implemented storage and handling controls in the following EMS procedures to minimise likelihood of spillage occurrence and impact:</p> <ul style="list-style-type: none"> • Procedure No 3.1 Fuel and Oil Storage • Procedure No 3.2 Refuelling of Plant and Equipment 	<p>Form No 5.1a Key Contacts provides contact information for an oil spill contractor to assist in the clearance of the spillage.</p> <p>In the event of large spillages and those resulting in insufficient quantities of fuel and oil for plant and equipment, refer to Note One.</p>
Protester and Industrial Action	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Damage to local road network resulting in disruption to incoming and removal of materials.</p>	The Site itself is not a matter of public interest. There has been no history of protester or industrial action at the Site.	<p>For protester action, refer to Note One.</p> <p>For industrial action, refer to Note Three.</p>
Disease/ Pandemic	<p>Disruption to Site operations due to reduced members of staff working.</p> <p>Illness or death.</p>	A pandemic has the potential to affect multiple members of staff with illness or self-isolation (including simultaneously).	Refer to Note Four.



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
<p>Loss of telecommunications (i.e., landline, mobile phones, internet)</p>	<p>Disruption to Site operations due to less effective communication between staff.</p> <p>Disruption to Site operations due to inability to communicate to customers and suppliers under emergency/abnormal operations.</p>	<p>The Site is in a highly populated area of Coventry and adjacent to an industrial estate, meaning the loss of telecommunications is unlikely.</p> <p>It is unlikely for all telecommunications to be lost simultaneously.</p> <p>The loss of the landline, mobile and internet is unlikely to disrupt Site operations directly as internal communication is completed directly to/between staff.</p> <p>Loss of landline/mobile is most likely to impact operations during emergency/abnormal conditions when contacting customers and suppliers in the event of cessation of Site operations.</p>	<p>In the event of landline loss, the Site can use mobile phones and emails to communicate with customers and suppliers.</p> <p>In the event of mobile phone signal loss, the Site can use landline and emails to communicate with customers and suppliers.</p> <p>In the event of internet loss, the Site can use landline and mobile phones to communicate with customers and suppliers.</p> <p>For planned loss of telecommunications, refer to Note 3.</p>
<p>Water supply failure</p>	<p>Disruption to Site operations due to reduced/no members of staff working.</p> <p>Disruption to Site operations as water is required for wheel washing.</p> <p>Air emissions from dust from stockpiles and surfaces, as these will not be suppressed.</p> <p>Air emissions from fires, as these will not be suppressed.</p>	<p>There is mains water located on the Site.</p> <p>Drinking water for welfare is a legal requirement. As mains water is unlikely to fail, it is not likely to impact on staffing on Site.</p> <p>The Site will use fire extinguishers, and inert materials are the primary suppression measures for small fires tackled by staff. Hydrants will only be used to suppress medium-large fires and those attended by the Fire and Rescue Service. As such, it is unlikely to impact on fire suppression operations.</p> <p>Appendix C Procedures and Forms, Procedure No 2.1 Waste Acceptance prevents the receipt of unauthorised dusty wastes, which require water for minimising dust emissions.</p>	<p>Refer to Note 3.</p> <p>Appendix C Procedure No 5.5 Utilities and Equipment Failure.</p>



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
Electrical Supply Failure	<p>Disruption of Site operations due to no power to plant and equipment.</p> <p>Disruption to communications due to computers and internet not working.</p>	<p>It is unlikely for the Site to experience electrical supply failure.</p> <p>The Site has electricity is used to power the weighbridge and screener.</p>	<p>Refer to Note One.</p> <p>Appendix C Procedure No 5.5 Utilities and Equipment Failure.</p> <p>Mobile phones and the landline can be used to communicate with customers and suppliers if required.</p>
Non-operational Third-party haulier / offtake facility	<p>Exceedance of the combustibile waste storage threshold, see Appendix A.4 Fire Prevention Plan.</p> <p>Increased emissions from contravening waste, which can impact the local amenity due to increased waste stored on Site.</p> <p>Cessation to incoming waste material.</p>	<p>The Waste Acceptance Procedure minimises the likelihood of receiving unauthorised wastes (which require removal to an offtake facility) and contravening wastes, which require removal from Site to a third-party offtake facility, see Appendix C Procedures and Forms, Procedure No 2.1 Waste Acceptance.</p> <p>As a Waste Transfer Station accepting mixed household, commercial and industrial wastes, it is unlikely to generate significant quantities of contravening wastes, which require removal to a third-party offtake facility.</p>	<p>It is the preferred option of the Site for the delivering vehicle to reject unauthorised waste immediately, see Appendix C Procedures and Forms, Procedure No 2.3 Waste Rejection.</p> <p>If required, alternative hauliers and offtake facilities will be sourced and used.</p>
Severe Accident or Personal Injury	<p>Injury or death</p> <p>Disruption or temporary cessation to Site operations.</p>	<p>Staff are trained in completing waste operations, so injury or death is unlikely.</p> <p>Serious injury or death could result in HSE and police investigation which would cause disruption or temporary cessation to Site operations.</p>	<p>Refer to Note Four.</p>
Security Incident	<p>Damage and theft of Site infrastructure resulting in reduced operational ability.</p> <p>Air pollution.</p>	<p>The Site has security measures in place, see Appendix C Procedures and Forms, Procedure No 3.6 Site Security.</p> <p>These measures minimise the likelihood of a breach in security. This reduces the likelihood of arson, vandalism as well as plant/equipment damage or theft.</p>	<p>Maintenance of Site security measures, see Appendix C Procedures and Forms, Procedure No 3.6 Site Security.</p>



Hazard	Potential Impact	Likelihood of Impact	Contingency Measures
	<p>Pollution of land, drains, groundwater, and watercourses.</p> <p>Loss of data and IT hardware due to physical theft, virus, or corruption.</p>	<p>The Site has security measures to reduce likelihood of data and IT hardware loss, see Appendix C Procedures and Forms, Procedure No 3.6 Site Security</p>	<p>For physical security measures resulting in significant damage and impact to the Site, refer to Note Four.</p>
<p>Key Plant and Equipment Failure</p>	<p>Damage to Site infrastructure resulting in reduced operational ability.</p> <p>Pollution of land, drains, groundwater, and watercourses.</p> <p>Increased emissions from malfunctioning plant and equipment which can impact the local amenity (e.g., noise, vibration)</p>	<p>There is always a risk of plant and equipment malfunction, but it is unlikely to result in the cessation of Site operations.</p> <p>Staff are trained in using plant and equipment, so malfunction causing operational and environmental impact is unlikely to occur. See Appendix C Procedures and Forms, Procedure No. 1.1 Environmental Training, Awareness and Competence.</p> <p>Pre-use checks on plant and equipment provide an early indication of malfunction, which reduces likelihood occurrence and impact, see Appendix C Procedures and Forms, Procedure No. 3.3 Maintenance and Form 3.3a Inspection Checklist.</p> <p>Maintenance and servicing as per manufacturer guidelines minimise the likelihood of malfunction and leaks/spillages, see Appendix C Procedures and Forms, Procedure No. 3.3 Maintenance.</p>	<p>Malfunctioning plant and equipment are not used and are repaired as soon as practicable, see Appendix C Procedure No 5.5 Utilities and Equipment Failure.</p> <p>Repairs and servicing on plant and equipment are completed by competent contractors.</p>



Note One

The Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.

If operations can continue:

- The Site Manager will inform Site staff.
- If necessary, customers will be informed of continued operation of the Site.
- Site staff and customers will be informed if alternative transport routes are needed to access the Site.

If operations cannot continue:

- The Site Manager will inform Site staff that they need to leave Site.
- Staff members are to inform incoming vehicles of the closure and divert away from Site.
- Inform customers of the cessation of Site operations.
- Alternative Sites will be identified to customers if possible.
- The Environment Agency will be informed of Site closure.

Note Two

The Site Manager will obtain incident specific information such as proximity to Site, the scale, any injuries or fatalities and time of the incident. Larger scale incidents resulting in injuries and fatalities in operational hours are more likely to impact on business continuity. Based on this information, the Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.

If operations can continue:

- The Site Manager will inform Site staff.
- If necessary, customers will be informed of continued operation of the Site.
- Site staff and customers will be informed if alternative transport routes are needed to access the Site.

If operations cannot continue:

- The Site Manager will inform Site staff that they need to leave Site
- Staff members are to inform incoming vehicles of the closure and divert away from Site.
- Inform customers of the cessation of Site operations.
- Alternative Sites will be identified to customers if possible.
- The Environment Agency will be informed of Site closure.

Note Three

Information has been obtained in advance allowing the Site Manager to make a proactive, informed decision about managing Site operations and implementing any control measures to facilitate the continuation of Site Operations. Following the receipt of information in advance and reviewing any control measures to implement, the Site Manager will determine if operations can continue. If safe to do so, continuation of operations is the preferred option.

If operations can continue:

- The Site Manager will inform Site staff.
- If necessary, customers will be informed of continued operation of the Site.



- Site staff and customers will be informed if alternative transport routes are needed to access the Site.

If operations cannot continue:

- The Site Manager will inform Site staff that they need to leave Site.
- Staff members are to inform incoming vehicles of the closure and divert away from Site.
- Inform customers of the cessation of Site operations.
- Alternative Sites will be identified to customers if possible.
- The Environment Agency will be informed of Site closure.

Note Four

Operations are completed in accordance with Government, Regulator (e.g. EA, HSE) or emergency service (e.g. police, fire service) guidelines and policies.

Based on the Government, Regulator or emergency services guidelines and policies, the Site Manager will determine if operations can continue. If safe to do so, continuation of operations is the preferred option.

If operations can continue:

- The Site Manager will inform Site staff.
- If necessary, customers will be informed of continued operation of the Site.

If operations cannot continue:

- The Site Manager will inform Site staff that they need to leave Site.
- Staff members are to inform incoming vehicles of the closure and divert away from Site.
- Inform customers of the cessation of Site operations.
- Alternative Sites will be identified to customers if possible.
- The Environment Agency will be informed of Site closure.