

City Batteries Ltd

Albion Yard, Manor Road, Erith, Kent. DA8 2AD

Fire Prevention Plan ("FPP")

The following Fire Prevention Plan has been created to assist all management, employees and visitors of City Batteries Ltd in complying with its requirements, as well as to provide other helpful information. This plan will review the standard for particular requirements that are applicable to their individual situation and make adjustments to this plan that are specific to the company's operation. The Fire Risk Assessment accompanying this plan is a separate document and will assess all parts of the operation.

Under our Environmental Permit, the site does not accept any combustible waste apart from lead acid batteries under EWC codes 16 06 01*, 20 01 33* and, associated non-ferrous scrap metals from the battery casings etc. Although the site's permit allows it to accept other battery types our pre-acceptance and acceptance procedure stops this happening. All waste will be stored in compliance with guidance 5.06 and no other combustible waste will be accepted on site until a revised Fire Prevention Plan is submitted and has been approved by the Environment Agency.



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Section 1 Site Details

a. Activities

City Batteries Ltd ("CBL") operates a waste transfer station for end-of-life batteries and associated non-ferrous metals. The business collects batteries from all over the UK, albeit its core business is within London and the Southeast of England. CBL only collects batteries that are lead acid and these are primarily collected from the Automotive Industry and forklift companies (Traction Batteries).

When the batteries are received on site, they are first checked to confirm their chemistry and to ensure they match with the description and quantity provided in the pre-acceptance paperwork. Once the batteries have been checked and accepted on to site, they are then treated under the site's ABTO to categorise them into either Industrial, Automotive or Portable in line with the EU Batteries Directive. This treatment is a physical check only.

The large industrial batteries are treated on site by breaking the plastic casing away from the lead plates. The plates are then dried before being sent on to be recycled. The breaking process greatly reduces the risk of the batteries either overcharging or shorting against each other.

Automotive, small industrial and portable batteries are consolidated before being shipped on to lead smelters in the UK for final processing. Automotive and portable batteries are shipped out on a weekly basis during peak months, and this can be increased as required; we would expect this to be within approximately five working days of the batteries arriving on site. During busier times of year, additional shipments are arranged to reduce storage times.

b. Location

City Batteries Ltd operates on the edge of the industrial estate in the heart of Erith. The site sits within a secure yard with high concrete block walls and iron gates with a night security barrier for additional security.

The immediate area around the site is either other business units or land waiting for development. To the front of the site on the main highway (Manor Rd) are terraced housing and the local school is 1.5 kilometres away. There are no major roads, railway lines, airports or utilities within 1 kilometre of the site.

The site has a sealed drainage system to contain major spillages or fire water if there was to be an incident and the wall around the site acts as a barrier to contain any excess water in the case of a major incident which can be collected, cleaned out and sent on for forward treatment.

c. Site Plan

The site (appendix E) consists of a warehouse and a separate covered area that is used for the treatment of traction batteries and, to store the lead plates awaiting onward transport off-site.

The main warehouse area (320 square metres) is used to receive the batteries and store the consolidated automotive, portable and industrial batteries awaiting processing. The breaking shed (the covered area) is 180 square metres.

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The offices are located in portable cabins to the front of the main warehouse and the yard is double gated for security.

The site is approximately 9250 sq feet with a weigh bridge to the side of the main warehouse and offices for incoming and outgoing loads. Overnight parking for our HGV vehicles is off site in a local secure yard and staff parking is also off site.

Section 2 Preventing Fires

a. Waste stored on site

City Batteries only collects Lead Acid Batteries and non-ferrous metals. Once the waste is received on site, there is a very swift process in place which means that from day the batteries arrive on site, go through the acceptance procedure, are treated/broken and packaged, they are ready for shipment off-site within a few days.

The batteries received are broken with the plastics and lead plates consolidated into viable loads for onward shipment. The plastic waste is despatched whenever there is a full load, and the lead plates are normally despatched 48 hours after being broken which gives the plates enough time to dry out and be prepared for onward shipment.

Shipments off-site are pre-booked based on expected volumes. This reduces the need to store batteries any longer than necessary. Normal working stock of batteries is aimed to be kept below 80 tonnes on a normal working day. Plastics and scrap are shipped out whenever there is a viable load. Our pre-acceptance procedure reduces the risk of receiving unlicensed material or waste that we do not have outlets for. However, should the need arise any and all quarantined material will either be returned to the consignor or moved to the correct disposal site as soon as after being received. The site would aim for this to be within 24 hours of acceptance. Where this is not possible the Environment agency will be informed, and the waste will be monitored and stored in a safe area (the quarantine area) until it can be transported to the final disposal site or returned to the consignor.

b. Storage plan

Appendix F to this plan is a copy of the site's storage plan. The plan shows a layout of the warehouse and where the batteries, lead plates and plastics are stored.

The batteries will not be stored for any length of time in the warehouse as the site currently sends shipments out daily keeping storage to a minimum. Scrap metal is usually either collected by local scrap merchants or delivered in whenever the containers are full. The storage of scrap metal is kept below 10 tonnes at all times.

Onward shipments to smelters will normally leave site on a daily basis and so, the batteries could leave site the same day as they arrive. However, we expect them to be loaded and shipped within five working days. We check the stock levels at the end of each day and monitor storage. Stock is rotated daily to ensure the stock moves swiftly in the warehouse. Quarantined stock will follow the same procedure. The Management system allows for a maximum of 150 tonnes in storage; however, we anticipate having on average about 80 tonnes in storage on any day this allows for consolidating loads and the batteries waiting to be formally accepted by the ABTO.

c. Storage duration

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Once a load of batteries has been accepted on site, our operational plan keeps the batteries moving. Initially, the batteries will be moved into the breaking shed to be broken or will be consolidated and shipped to a UK smelter for recycling.

Automotive, small industrial and portable batteries are shipped out on a regular basis and normally within 5 working days or sooner depending on volume. Large Industrial batteries are broken within 48 hours of being moved into the breaking area. Non-Ferrous Scrap metal (e.g. steel Cases from traction batteries) is consolidated and taken to local facilities whenever there is a viable load, which is normally twice a week.

d. Monitoring

A visual check of the stock is carried out each evening before the warehouse is locked. Monitoring is a physical check to ensure the batteries are stacked properly and in the correct area of the warehouse. Each morning and evening, the warehouse supervisor does a walk round check of the warehouse checking security, housekeeping as well as stock levels.

To assist with monitoring, heat sensors are fitted to the warehouse which are connected to an offsite monitoring centre. If alarmed, the sensors will call the key holders and/ or the fire brigade, if required. CCTV cameras cover the whole warehouse and yard areas; these are monitored on a regular basis and used as part of the day's procedures to check for hot spots. Smoke detectors are fitted to the canteen and office areas. The warehouse, yard and offices are all fitted with fire extinguishers and, additional extra large fire blankets are installed in the warehouse to be used to smother small fires, if required.

e. Actions to limit self-heating

As most of the batteries received on site are large industrial lead batteries, they can be quickly categorised and accepted. Once accepted, they are prepared for the breaking area. This process in itself immediately reduces the risk of overcharging and self-heating.

On site, batteries are stacked upright on pallets ensuring the terminals cannot touch each other; this prevents overcharging and shorting between the terminals. Any damaged cells are stored separately. All trailing wires are removed to reduce the risk of short circuits and overheating. Damaged cells (if received) have their terminals taped to prevent short circuiting where batteries are badly damaged; they are packed in drums with vermiculite or sand until they can be treated. Full training is given to all warehouse staff covering the treatment, loading, wrapping and storage of batteries on pallets. All training is recorded on our training matrix and documented in the personnel files.

f. Arson & Vandalism

The warehouse is fully covered by CCTV and all exits are closed and locked outside of operational hours.

The yard is surrounded by a high brick wall with double security gates. No waste or combustible materials are stored outside in the yard. The general waste bin is of steel construction and will be stored more than six metres from the buildings.

No Gas bottles are stored on site and an intruder alarm is fitted to the office and warehouse doors.

g. Plant and Equipment

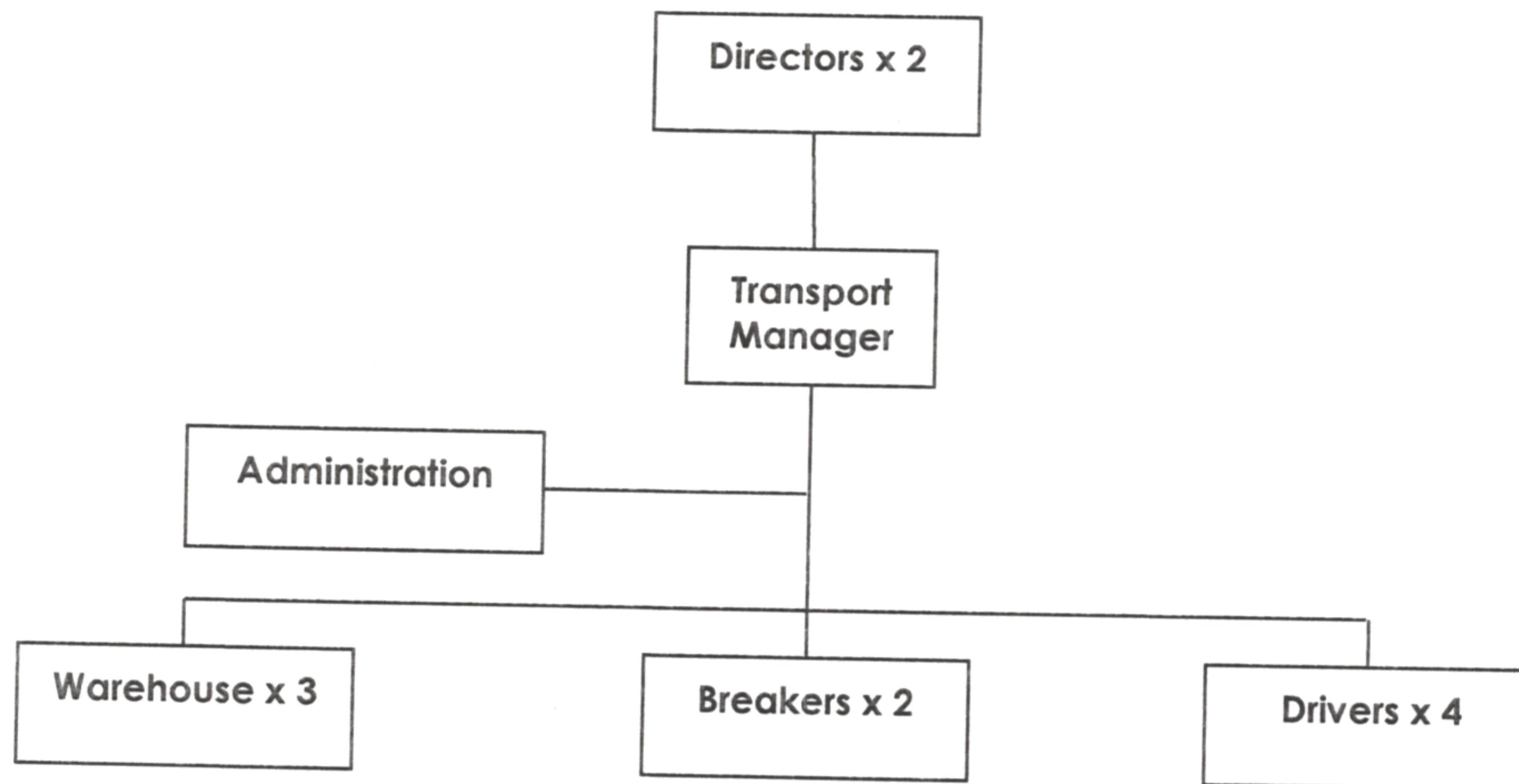
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Site equipment (I.e. fork lift trucks and pallet trucks) are maintained and monitored through regular daily checks (see attached annex) and regular maintenance schedules (see attached annex) with our approved supplier. PAT testing is done on an annual basis and fixed wiring tests are done every 5 years on all equipment. All records are kept on file in the main office.

h. Infrastructure



i. Site Inspections

Site inspections are carried out regularly. The below lists the inspections in place to help prevent a fire:

Daily Checks/inspections (**appendix B to this plan**)

- Boundary Checks
- Acid Tank & Drains
- FLT Checks

Weekly checks/Inspections (**appendix C to this plan**)

- Emergency lighting
- Fire Alarm Check
- Fire point and extinguisher checks

Other Checks/Inspections

- PAT Testing (every 12 Months)
- Fixed wiring check (every 5 years)

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j. Electrical Faults

In an endeavour to reduce the risk of electrical faults on site, CBL has a strict maintenance program in place, as follows:

- All electrical equipment is turned off when not in use and where it is discovered that extension cords are needed on a long-term basis, wiring improvements will be made to reduce overloading circuits.
- PAT testing is carried out on all electrical appliances used in the business. Testing is recorded and a record kept on file.
- Hard wiring checks are carried out every 5 years and again, records kept on file.
- The use of portable electrical heaters is banned within the warehouse and offices of City Batteries Ltd.
- All electrical equipment is properly maintained when outside contractors enter the site to perform maintenance, and they must provide method statements and risk assessments before they are permitted to commence work. All risk assessments and method statements will be kept on file.
- Ensure that heating units are safeguarded.
- No flammable liquids to be stored on the premises.
- Ensure that required hot work permits are obtained.
- Turn off electrical equipment when not in use. A qualified maintenance Person(s) will ensure that equipment is maintained according to manufacturers' specifications. Only properly trained individuals shall perform maintenance work. The following equipment is subject to the maintenance, inspection, and testing procedures:
 - Emergency Lighting,
 - Detection systems for smoke, heat, or flame;
 - Fire alarm systems; and emergency backup systems.

k. Ignition source

A strict housekeeping regime reduces ignition sources. As well as a housekeeping policy and training, a part of the daily checks carried out on site are to ensure that the policy and training are being adhered to. The daily checks will ensure that:

- Work areas free of dust, fly, scraps, and similar material.
- Bins are emptied before they overflow and at the end of each working day
- Spills etc. Have been cleared up immediately and reported

l. Heat and Spark Prevention

Due to the activities performed on site, CBL does not anticipate the need for any hot works to be carried out on the site. However, to ensure that in the event the need ever occurs, we reduce the risk of this by only allowing this type of work to be carried out by a qualified person. In addition, work is only to commence once we have received a relevant method statement "Hot Works" (i.e. welding or working with an open flame or other ignition sources) in controlled and well-ventilated areas and only with the permission of the site supervisor.

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All batteries will be packed in a way to prevent battery terminal cross circuiting and prevent overcharging reducing the chance of overheating or sparks from touching terminals. Full training is given to all warehouse staff on the packing and storage of lead acid batteries.

Smoking including E Cigarettes; Smoking and E cigarettes are prohibited in all City Batteries Ltd, buildings and site unless in the designated area. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.

m. Gas bottles and other flammable items

No waste gas bottles or flammable items are accepted on site. CBL only collects lead acid batteries, and its drivers are fully trained to check the loads before they are loaded to reduce errors made by customers in consigning the wrong materials. The site's waste pre-acceptance and acceptance procedures again ensure that only lead acid batteries are accepted on site.

Wherever possible and practical, non-flammable materials will be used in the maintenance and cleaning regimes, but where flammable materials are needed, these will be stored in well-ventilated areas away from ignition sources.

n. Smoke/Heat Detection

A fire alarm/detection system is installed in the warehouse, offices and staff areas (EDA Zero plus, this is a wireless heat detection system, and it is specifically designed to be used wirelessly). The warehouse has heat detectors fitted due to the working environment whilst the offices and staff areas have smoke detectors. Alarm points are fitted in the warehouses, yard and offices in line with our Fire Risk Assessment. The alarm system including fire suppressants are serviced bi-annually (Phoenix Fire Alarms) and the alarm and lighting tested on a weekly basis. All records are recorded in the fire log. A plan of the Site Safety call points can be found at appendix G.

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Section 3 reducing the impact of a fire

a. Waste Acceptance

CBL only accepts Lead Acid batteries and associated non-ferrous metals (e.g. steel casings from fork truck batteries and copper connectors). CBL staff are all trained on the acceptance procedure and permit conditions. The batteries are collected by its own vehicles or by an approved contractor; all drivers are fully trained on permitted waste for our site. CBL does not collect or accept scrap metals from the public, however, it will accept lead acid batteries from door trade. CBL only collects from its existing customer base who are aware of what it collects and how it is collected. New customers are required to complete a questionnaire before CBL will collect and are made fully aware of the site's service and procedures. Such measures greatly reduce the risk of collecting non-conforming product. Where batteries were to be delivered by a third party, the consignor must first complete a pre-acceptance form and send photographs to the main office to ensure they are only sending lead acid batteries and again CBL only accepts batteries from existing customers.

The waste acceptance training undertaken on site incorporates the following key points:

- Incompatible loads will be refused and sent back to the consignor and the environment agency informed if it could not be returned. The vehicle would be quarantined and the agency informed.
- Quarantining waste, ensure adequately packed and the customer is informed.
- Completing a consignment note completing part E of the consignment note as the consignee.
- Permitted Waste all staff to be fully aware through training of what wastes is permitted onto the site.

b. Waste Treatment

CBL only accepts, for treatment, Lead acid batteries. The batteries are firstly treated as an ABTO which categorises the batteries into three categories: Industrial, automotive or portable.

The batteries are then packed and sent to recycling facilities within the UK.

Large industrial batteries are broken on site and the plates removed. Following this, the plates are then packed and wrapped onto pallets and sent on for onward recycling.

The breaking process is as follows:

- Wet cells have the outer casings removed.
- The lead plates are then stacked in leak proof boxes to await onward shipment.
- Any acid and wash water from the breaking is collected in a stainless-steel tank and then pumped into a holding tank awaiting collection for neutralisation.

The large percentage of batteries received on site are dry cell batteries and these are taken straight to the breaking area where the tops of the batteries are removed. This is a manual

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process and once the top of the battery is removed, the lead plates are knocked out. The plates are then stacked in UN approved containers and made ready for onward shipment.

c. Waste storage

All batteries received on site will be stored within the outlined storage area on the storage plan attached and all non-ferrous metals will be stored as shown on the plan.

All material is stored on an impervious surface with a minimum of 1 meter between each line.

Steel casings from battery packs wherever possible are sent to EMR for recycling daily, this reduces the need to store the casings overnight.

Where waste batteries and battery plates are damaged, in the event of a fire, they will still be sent for recycling as the damage caused by fire does not affect the recycling process.

No other waste will be stored on site.

d. Fire Walls

Due to the limited amount and type of waste stored on site and the fact that the waste is all one waste stream, the need for fire walls between waste streams is not required. However, there is a fire wall next to the main entrance to secure the fire escape.

A minimum of 1 metre will be kept between each row of waste batteries to help reduce the risk of a fire spreading and where possible, the distance will be 2 metres.

Extra-large Fire blankets are available to suppress small fires, if required. This will allow staff to leave safely and prevent the fire from spreading until the fire brigade can arrive.

e. Quarantine area

The quarantine area will be used for the storage of non-conforming Batteries and unidentifiable batteries that have been accidentally mixed with lead acid batteries.

The waste in this area will be dealt with as quickly as possible and all non-conforming batteries will be consigned on to another ABTO that deals with the batteries, this is presently Waste Care Ltd. The quarantine area is away from the main storage area as defined in the storage Plan.

f. Storage within the building

There is designated storage areas clearly marked within the main warehouse area. No waste will be stored outside the main warehouse area. All waste will be stored in line with the storage plan. The maximum storage will be 150 tonnes although we would look to have only a maximum of 80 tonnes of Batteries on site at any given day. The additional storage for batteries is to allow us to manage any unforeseen transport issues etc.

g. Active Fire fighting

All staff including drivers are trained in the use of fire extinguishers and fire fighting equipment (renewal date for training is the 05-10-25. The training is refreshed every 3 years or if there is a re-assessment. The initial training and refresher training will be done by Phoenix Fire Alarms who are contracted to service and maintain the fire alarm system on site. Phoenix also installs

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and maintains all the firefighting equipment on site (e.g. Fire extinguishers fire blankets etc.). All ongoing training will be recorded in the training matrix. There will always be at least 2 fully trained fire marshals on site and all fire extinguishers will be clearly marked showing the fires they are designed to fight. Fires will only be attempted to be extinguished where the person fighting the fire deems it to be safe and practical. Where the fire cannot be extinguished, the alarm will be sounded, and the building will be evacuated and the fire brigade called. At no time is it expected that a member of staff shall put themselves in a position of danger when dealing with a fire. If the fire becomes unmanageable, staff are required to leave the site immediately whilst raising the alarm and congregate at the fire assembly point at the entrance to the site.

h. Water supply

There are two fire hydrants on Manor Road. The first is outside the main gate and the other is located across the road on the corner of Manor Road & Frobisher Road (For information on water supply and service records I have contact the Fire Brigade wateroffice@londonfire.onmicrosof.com). See further appendix H.

i. Fire Water Containment

The warehouse and unloading area have sealed drainage systems and therefore are capable of containing fire water with a capacity up to 800 litres calculation Floor Space x Depth of Bund -10% 145 sq meters x 0.5 metre = 66,000ltrs.

Any fire water contained within the bund will be taken away for disposal.

j. Contingency for during the fire

There is a firebox by the gate for the fire brigade which contains:

- Details of the waste stored on site.
- All site plans.
- Contact sheet.
- Storage Plan.

k. Training

As part of CBL's induction training, all members of staff on their first day shall complete basic mandatory training as part of their induction, the training will consist of:

- Fire Action
- Use of Fire extinguishers
- Manual handling
- Working at Height
- House Keeping
- Reporting accidents and near misses

We carry out emergency fire drills; these are recorded in the fire logbook along with all the regular checks and certificates.

All training record will be recorded on our training matrix (example attached) and reviewed on a regular basis an example of the matrix is attached.

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Appendix A

[illegible]

Revised January 2025

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Appendix B



CITY BATTERIES LTD
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Forklift Inspection Sheet

Forklift Truck Number	Monday Name	Tuesday Name	Wednesday Name	Thursday Name	Friday Name	Saturday Name	Sunday Name
	Lansing 3	Lansing 3	Lansing 3	Lansing 3	Lansing 3	Lansing 3	Lansing 3
Name							
Sign							
Date							

Item	N/A	M	T	W	T	F	S	S	Check Referred
Battery									
Coolant									
Oils									
Fork Arms									
Carriage Plate									
Backrest Extension									
Mast									
Mast Rollers/Slide									
Lift Chain									
Chain Pulleys									
Hydraulics									
Wheels									
Tyres									
External Conditions									
Operating position									
Gas Powered Trucks									
Starting Procedure Engine Trucks									
Starting Procedure Electric Trucks									
Lights									
Audible Warnings									
Hydraulics Control									
Drive & Braking									
Steering									
Rated Capacity Plate									

FAULTS:

Always follow manufacturers recommendations/instructions on pre site shift Safety Checks

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Appendix C

City Batteries Ltd				
Extinguisher Types: F oam P owder C O2				
Fire Extinguisher Register				
Number	Location	Type F P C	Capacity - Kg	Comments
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Appendix D

Flammable and Combustible Material Checklist

Are combustible scrap, debris, and waste materials such as wood and plastic stored in appropriate receptacles and removed from the worksite promptly	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are NO SMOKING signs posted on in prominent positions	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are any combustible liquids on site? If yes please specify below	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are gas cylinders stored/ used on site if yes please specify	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are fire extinguishers appropriate for the materials in the areas where they are mounted?*	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are extinguishers free from obstruction or blockage	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all extinguishers serviced, maintained, and tagged at least once a year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all extinguishers fully charged and in their designated place	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all spills cleaned up promptly	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all recyclable / combustible waste collected from the offices emptied on a daily basis (e.g. Waste paper, plastics etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No

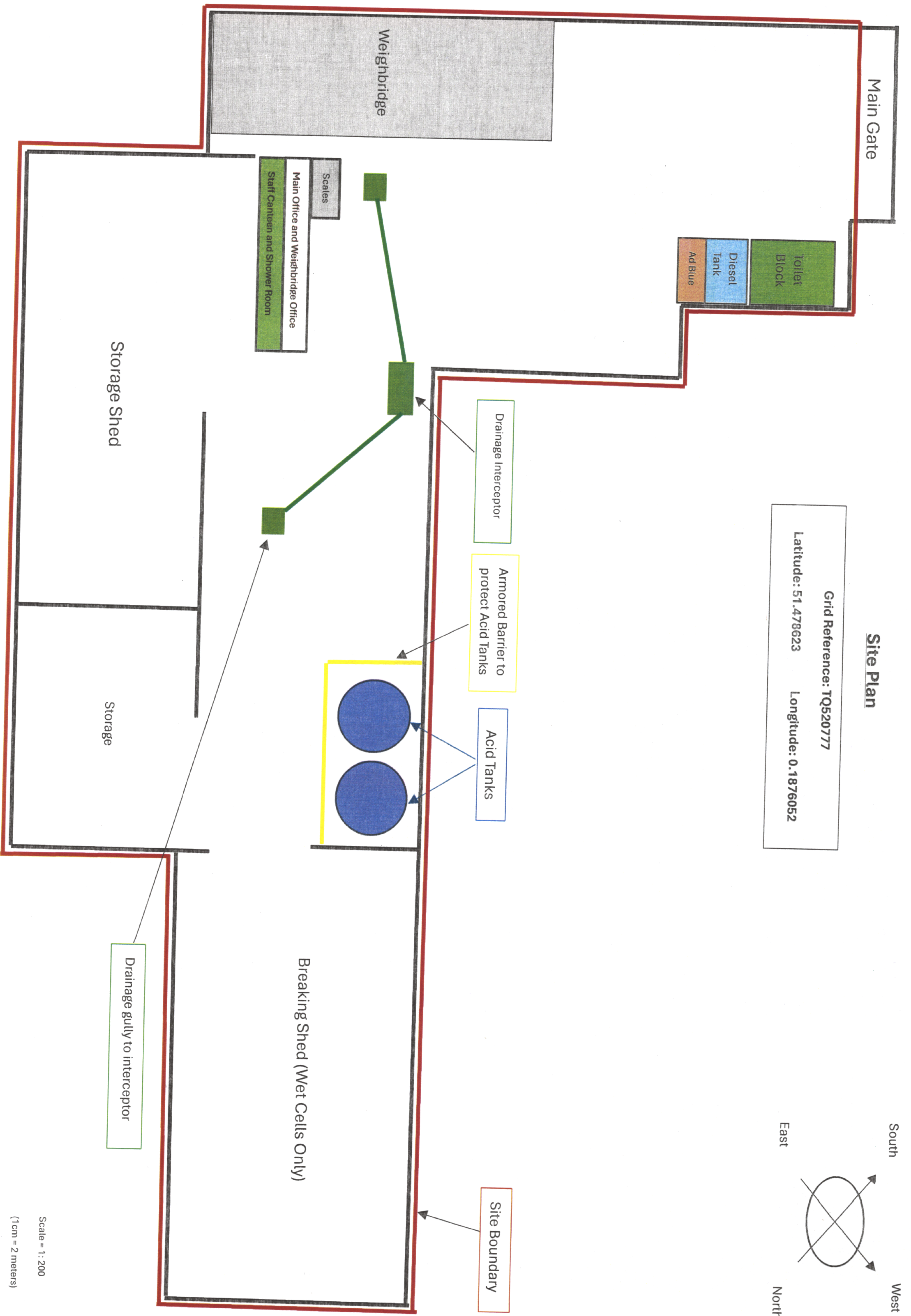
(NOTE: Use of fire extinguishers is based on company policy regarding employee fire fighting in your Emergency Action Plan and local fire code.)

Where no has been ticked please put actions in box below

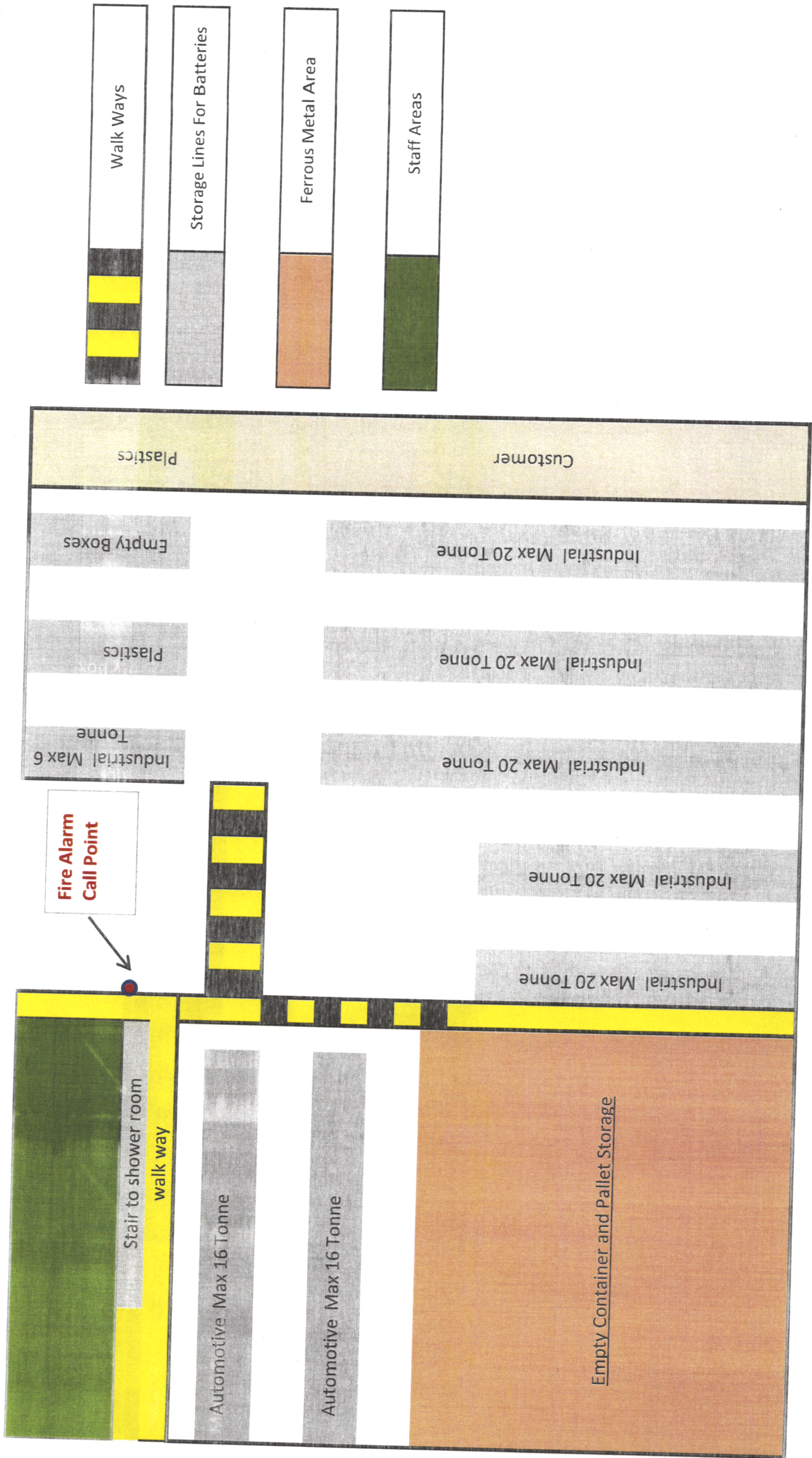
Completed by: _____ Date: _____

Actions

Appendix E



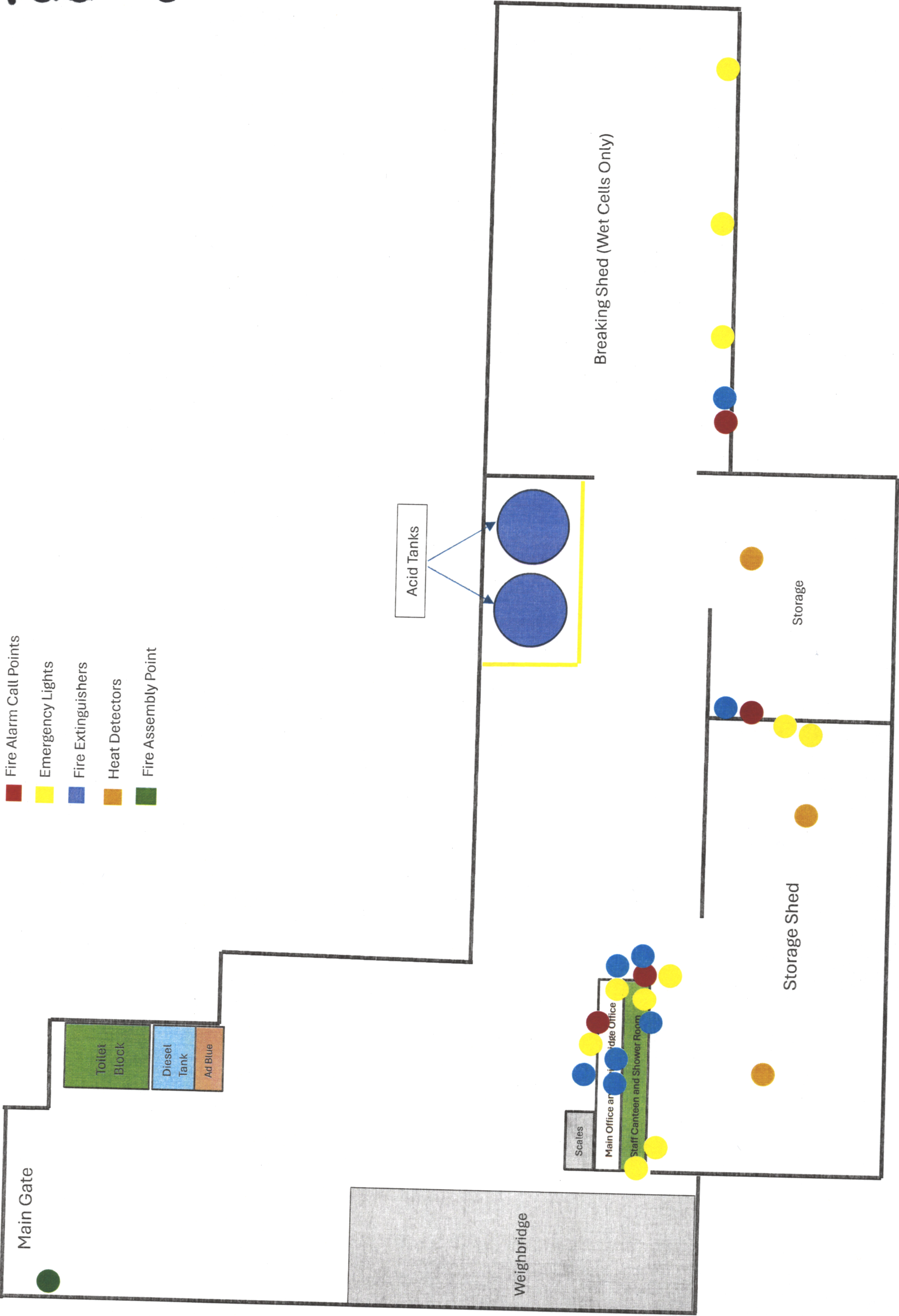
Appendix F



Appendix G

Site Safety Call Points Plan

- Fire Alarm Call Points
- Emergency Lights
- Fire Extinguishers
- Heat Detectors
- Fire Assembly Point



A detailed street map of a residential area in Ipswich. The map shows a grid of streets including Appold Street, Appold Close, Appold Lane, and Appold Road. Numerous houses are depicted with their respective numbers. A blue house icon is located on Appold Lane, near the intersection with Appold Close. The map also shows a park area labeled 'Moor Park' and a 'Moor Park' area. The map is oriented with North at the top. The area is bounded by Appold Road to the north, Appold Lane to the south, and Appold Close to the west. The map shows a dense residential area with many small houses and some larger buildings. The map is a color print with yellow and brown tones. The map is a detailed street map of a residential area in Ipswich. The map shows a grid of streets including Appold Street, Appold Close, Appold Lane, and Appold Road. Numerous houses are depicted with their respective numbers. A blue house icon is located on Appold Lane, near the intersection with Appold Close. The map also shows a park area labeled 'Moor Park' and a 'Moor Park' area. The map is oriented with North at the top. The area is bounded by Appold Road to the north, Appold Lane to the south, and Appold Close to the west. The map shows a dense residential area with many small houses and some larger buildings. The map is a color print with yellow and brown tones. The map is a detailed street map of a residential area in Ipswich. The map shows a grid of streets including Appold Street, Appold Close, Appold Lane, and Appold Road. Numerous houses are depicted with their respective numbers. A blue house icon is located on Appold Lane, near the intersection with Appold Close. The map also shows a park area labeled 'Moor Park' and a 'Moor Park' area. The map is oriented with North at the top. The area is bounded by Appold Road to the north, Appold Lane to the south, and Appold Close to the west. The map shows a dense residential area with many small houses and some larger buildings. The map is a color print with yellow and brown tones.