



VALENCIA WASTE MANAGEMENT LTD

**FOXHALL LANDFILL, SUFFOLK – APPLICATION TO VARY PERMIT NUMBER
EPR/BW2943IG**

FIRE PREVENTION PLAN

JUNE 2024

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FIRE PREVENTION PLAN

JUNE 2024

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DRAWINGS	TITLE	SCALE
FOX-MRF001	Materials Recycling Facility Layout	1:500 @ A3
ST20399-002	Foxhall MRF Receptor Plan	1:10,000 @ A3

1 INTRODUCTION

- 1.1.1 Wardell Armstrong have been instructed to prepare an application to vary the permit for Foxhall Landfill at Brightwell, Suffolk. The site is operated by Valencia Waste Management Ltd (Valencia) under permit number EPR/BW2943IG.
- 1.1.2 Valencia is seeking to move waste up the waste hierarchy by treating mixed non-hazardous waste arriving at the landfill to recover metals and wood for recycling. Materials such as bricks, stones and glass will also be separated from the mixed waste for reuse as landfill cover and road maintenance. The residual wastes will be placed in the landfill.
- 1.1.3 This Fire Prevention Plan only applies to the new Material Recycling Facility (MRF). It provides details of the measures in place to minimise the risk of a fire occurring within the MRF. It also explains the firefighting measures in place, with the aim to extinguish any fire within 4 hours and minimise the spread of fire. Finally, it sets out the precautions to minimise the impact on the Environment should a fire occur.

2 WHO THIS PLAN IS FOR

- 2.1.1 This plan has been prepared for all site staff to ensure that they understand the steps to be taken to minimise the risk of fires, and to minimise the impacts of a fire should one occur.
- 2.1.2 Staff will receive training regarding the contents of the plan as part of their induction on joining the Company or transferring to the Foxhall Site. Training will cover the risks (e.g., the types of combustible waste stored), management systems to prevent fires, what to do in the event of a fire and managing clean up after a fire.
- 2.1.3 A copy of the plan will be kept in the site office, and it will also be made available via Valencia's electronic management system, allowing staff to have access via their computer.
- 2.1.4 The plan will be shared with contractors working on site, where applicable, to enable them to understand the implications of their actions and to manage their work safely.
- 2.1.5 Contractors or other visitors to the site should be accompanied by a member of staff familiar with this plan or should receive an induction, including as a minimum:
- confirmation that smoking is not allowed on site, other than in the designated smoking area;
 - how the alarm is raised in the event of a fire;
 - location of fire alarms and fire assembly points;
 - any specific precautions relating to their particular work.
- 2.1.6 The plan will be shared with the local Fire and Rescue Service to facilitate their understanding of site operations. The plan will be made available to them when they attend an incident on Site. It may also be shared during any routing visits or discussions regarding fire prevention.

3 TESTING THE PLAN

- 3.1.1 Fire evacuation procedures will be tested by carrying out a fire drill twice a year.
- 3.1.2 A wider exercise will be carried out once a year, providing refresher training on preventing fires and ensuring staff know how to respond in the event of a fire.
- 3.1.3 For a number of staff this annual refresher will include training on proper use of fire extinguishers or other firefighting equipment.

4 WASTE TYPES

4.1 Combustible Wastes

4.1.1 The following combustible materials may be stored or treated inside the MRF:

- mixed municipal waste and similar materials;
- mixed construction and demolition wastes;
- sorted wood.

4.2 Persistent Organic Pollutants

4.2.1 The MRF will not accept wastes contaminated with persistent organic pollutants (POPs) at levels that would require them to be managed as POPs waste.

4.3 Other Combustible Materials

4.3.1 Small quantities of hydraulic oil or lubricating oil will be stored on site to be used in maintenance of site plant. These will be stored in suitable drums or containers in a designated storage area provided with appropriate bunding.

5 ACTIVITIES AT THE SITE

- 5.1.1 The activities within the MRF will include the elements described in the following paragraphs.
- 5.1.2 Household commercial and industrial waste which is suitable for treatment will be unloaded inside the MRF building into the waste reception bay, marked as 'incoming' on drawing FOX-MRF001.
- 5.1.3 The waste will pass on a picking conveyor, in order for staff to manually remove recoverable metal and wood fractions. Metals and wood will then be placed into the appropriate storage bays pending recovery off site. Staff will sort the materials by hand to remove any materials remaining in the wrong stream and ensure it is directed to the correct storage bay.
- 5.1.4 Residual wastes following treatment will be stored pending either disposal at the landfill.
- 5.1.5 Mixed wastes may be stored in the bay for short periods but the aim will be to treat waste on the day of receipt. Waste will not be stored on site for more than 72 hours before treatment. Residual waste will be removed from site within 72 hours.
- 5.1.6 The Site layout is shown on Drawing FOX-MRF001.

6 SENSITIVE RECEPTORS

- 6.1.1 The Site is not considered to be located in a particularly sensitive location. The MRF lies within the existing permitted landfill boundary.
- 6.1.2 The Site is situated in open countryside 8km to the east of Ipswich Tow Centre. The Site is bounded to the southeast by the A12 dual carriage way and to the north by Foxhall Road. To the western side of the site is woodland and to the south of the Site the land slopes down into the Mill River Valley.
- 6.1.3 The closest residential receptor is a property which lies 370m to the northeast. Beyond that lies Sheep Drift Farm and Sheep Drift Cottage. The closest commercial and industrial receptor is Brightwell Corner Agricultural Store and Storage Barns, located 160m to the east of the Site.
- 6.1.4 The closest protected habitat is Ipswich Heaths SSSI, the closest point is approximately 950m northwest from the Site.
- 6.1.5 The receptors are shown on Drawing ST20399-002.

7 MANAGE COMMON CAUSES OF FIRE

7.1 Arson

7.1.1 The Site has suitable security measures in place to prevent access by unauthorised persons. This includes fencing to the landfill.

7.1.2 The MRF is located inside a building, which will be manned during the day and securely locked outside of operational hours. The wider Site benefits from fencing and security gates to prevent unauthorised access.

7.1.3 All security measures will be routinely inspected and maintained to deter access to the Site. CCTV will be installed around the Site which will be monitored.

7.1.4 Fire detection and suppression measures will be in place, as set out later in this Fire Prevention Plan.

7.2 Plant and Equipment

7.2.1 Plant and equipment will include the picking line with conveyor.

7.2.2 All plant will be inspected and maintained in accordance with the manufacturers' recommendations. Damaged plant will be taken out to use until it has been repaired by a competent person.

7.2.3 Plant will be cleaned as necessary, to prevent build-up of dust or waste on hot surfaces.

7.3 Electrical Faults

7.3.1 All electrical work will be carried out by a qualified electrician. All electrical installations will be certified to demonstrate that they were installed correctly by a competent person. This also applies to repairs and alterations.

7.3.2 Copies of the certificates will be maintained in the site office.

7.3.3 Plant will be maintained in accordance with the manufacturer's recommendations with the frequency set out in the Preventative Maintenance Programme for the Site. Electrical installations such as wiring will be subject to safety checks every five years, portable appliances will be checked annually.

7.3.4 Staff trained to use the equipment will make a visual inspection at the start of the working day. Where there are loose or damaged wires or other indications that the plant may be unsafe the site manager will be advised and an electrician will be asked to attend site and check the equipment before it is turned on.

7.4 Discarded Smoking Materials

7.4.1 A strict no smoking policy will be applied at the Site. Smoking will only be permitted in the designated smoking area. Within this area adequate ash trays will be provided to ensure that materials can be extinguished safely and litter will be prevented.

7.4.2 There must be no smoking in any other part of the Site.

7.5 Hot Works

7.5.1 Hot works will include activities such as cutting and welding which may occur on an occasional basis as part of the maintenance of the plant and building. Hot works are not expected to be required frequently, but where they are needed a safe system of working will be in place.

7.5.2 A permit to work will be required for all hot works. Before this is issued a safe system of work must be prepared and provided to the site manager. This must include ensuring that all waste is cleared from the area where the work is required. Works must not take place within 2m of any stored waste. Where appropriate the distance may need to be increased or appropriate screens may be required to contain sparks.

7.5.3 During and following the works a fire watch should be in place to ensure that no wastes or other materials have ignited. This should take place as a minimum at the end of the works and following on hour.

7.6 Industrial Heaters

7.6.1 If it is necessary to use heaters, to maintain the welfare of staff, these will be used with care.

7.6.2 The heaters will be located at least 6m away from waste storage areas.

7.6.3 Heaters will be maintained in line with the manufacturer's recommendations.

7.6.4 Any litter will be removed from around the heater during the working day as required and dust will not be allowed to build up on any hot surfaces.

7.6.5 The heaters will be included in the fire watch at the end of the day.

7.7 Hot Exhausts

7.7.1 Plant and equipment will be monitored during the working day to ensure that there is no fire risk from dust or litter building up on hot surfaces. Where necessary machinery will be switched off and allowed to cool before removing dust and debris.

- 7.7.2 As far as possible plant employed on site will be fitted with angled exhausts to minimise the opportunity for dust or litter to gather on the exhaust.
- 7.7.3 When not in use, plant will be switched off and mobile plant will be parked at least 6m away from waste storage areas.
- 7.7.4 Plant will be cleaned and maintained as appropriate to minimise the risk of fire.
- 7.7.5 At the end of the working day a fire watch will be carried out. Plant will be inspected when it is switched off and then again before the building is locked for the night.
- 7.8 Batteries and Small WEEE
- 7.8.1 Batteries and small WEEE are not to be accepted into the MRF. However, batteries and small appliances containing batteries can be disposed of incorrectly in mixed municipal waste.
- 7.8.2 Loads consisting wholly or mainly of batteries will be rejected. At the pre-acceptance stage waste producers will be advised not to place batteries or WEEE in their general waste but to collect them separately for recycling.
- 7.8.3 Wastes are inspected during unloading and any loads containing large numbers of batteries or WEEE will be rejected.
- 7.8.4 Where a load contains a small number of batteries or WEEE and these can be easily identified and removed by hand, they will be picked out either before the waste is placed onto the picking line or during waste treatment (sorting, separating), and will be placed in a suitable container to separate the wastes.
- 7.8.5 Customers who regularly supply waste contaminated with batteries and/or WEEE will be sent a reminder that these should be collected separately and not placed in general waste.
- 7.9 Leaks and Spills of Oils and Fuels
- 7.9.1 Oils and fuels will be stored in appropriate containers with bunding provided. Oils for plant maintenance will be stored in a dedicated area. Diesel will be stored in a bunded tank separate from the building.
- 7.9.2 Plant will be properly maintained to avoid any leaks or spills. Plant will be subject to a daily visual inspection at the start of the working day. Any leaks identified will be investigated and appropriate repairs made as soon as possible.

7.9.3 Should a spill or leak of a flammable liquid occur, this will be cleared using a suitable absorbent material as soon as possible. The used absorbent will be placed in a suitable container and sent off site for disposal.

7.10 Reactions Between Wastes

7.10.1 Only non-hazardous waste will be stored and treated at the MRF. In addition, checks will be made at the pre-acceptance stage to ensure that wastes are suitable for treatment. Waste acceptance procedures are in place to ensure only permitted wastes are received. As such no incompatible wastes will be accepted on site and no reactions between wastes are expected.

7.11 Hot Loads

7.11.1 Waste will be inspected on arrival at Site, to ensure that they are in line with permit conditions and can be stored safely.

7.11.2 Should there be any sign that a hot load has been received, e.g. visible smoke or steam of the waste feels hot, then it will be directed to the quarantine area. Waste will be spread within the quarantine area to allow it to cool. It will then be moved to the reception bay if it is safe and appropriate to do so.

7.11.3 If a fire has taken hold, the fire will be extinguished within the quarantine bay and arrangements will be taken to dispose of the residues at a permitted site.

7.12 Hot and Dry Weather

7.12.1 Hot and dry weather is not expected to cause an issue regarding fire risk. All combustible waste is unloaded and treated inside the building providing some shelter from the sun. Recovered wood will be in the larger fraction sizes, and is stored in designated wood storage bays within the MRF building. During periods of hot and dry weather, there will be additional monitoring of the wood, and wood will not be stored for longer than 72 hours.

7.12.2 It is the intention that waste will be treated and residual waste will be removed from site within 72 hours limiting the extent to which it will dry out and become more flammable.

8 PREVENT SELF-COMBUSTION

- 8.1.1 The main mechanism for preventing self-combustion will be the management of storage times. The intention will be to treat waste as quickly as possible and to remove the residual combustible wastes from site within 72 hours.
- 8.1.2 The maximum storage time for recovered wood will also be for up to one month. Wood will be stored in large fraction sizes to prevent self-combustion.
- 8.1.3 All bays will be completely cleared on a regular basis to ensure that there is no build-up of older residual waste.
- 8.1.4 A stock rotation policy is not required as no combustible waste will be stored on site for long periods of time. The intention will be to clear combustible waste from site within a month of receipt.
- 8.1.5 It is not necessary to monitor the temperature of stockpiles, reduce the metals or fines content or control the temperature as no combustible waste will be stored for more than 3 months.
- 8.1.6 Metals, wood and residual waste will be stored loose in appropriate bays or containers.

9 MANAGE WASTE STOCKPILES

9.1.1 Waste will be stored to a maximum height of 4m and this height will be marked on the bay wall to ensure it can be easily monitored. This will ensure that a 1m freeboard is maintained to prevent fire spreading from one bay to the next.

9.1.2 The storage capacities are summarised in Table 9.1 below.

Table 9.1: Combustible Waste Storage Capacities and Times						
Waste stream	How it is stored	Max. length (m)	Max. width (m)	Max. height (m)	Volume (m ³)	Max. storage time
Mixed waste pending treatment	'Incoming' Bay inside MRF	20m	5.5m	4m	300	72 hours
Treated wood	Storage containers inside MRF	5m	5m	4m	100	1 month
Residual waste following treatment	Two bays inside MRF	20m	5.5m	4m	300	72 hours

9.1.3 No individual stockpile will be more than 300m³ in size. Stored wastes will be checked regularly throughout the day, to ensure waste is stored fully within the bay walls to minimise the risk of any fire spreading.

9.1.4 The bay walls are designed to have a fire resistance of 3 hours. This is in excess of the 2 hours fire resistance required by the Environment Agency guidance.

9.1.5 In the event of a fire, wastes may be moved from the bay to the quarantine area, where this can be achieved safely and will allow the fire to be extinguished more quickly and/or prevent the fire spreading more effectively than if it was contained in the bay.

10 PREVENTING FIRE SPREADING

10.1.1 The risk of fire spreading will be minimised by limiting the size of waste stockpiles. As all waste is to be stored inside a building, to control odour, litter, pests and noise, it is not possible to keep stockpiles 6m apart. Instead, they will be separated by robust bay walls as described in Section 9.

10.1.2 Fuel will be stored at least 6m away from the MRF.

10.1.3 When mobile plant is not in use it will be parked at least 6m away from any stored wastes.

11 QUARANTINE AREA

- 11.1.1 The quarantine area is shown on Drawing FOX-MRF001 Material Recycling Facility Layout. The quarantine area will span 247m², which will hold more than 50% of the largest stockpile.
- 11.1.2 The quarantine area is located outside in the southern corner of the MRF site.
- 11.1.3 The quarantine area will have a dual purpose. Firstly, it will be used to segregate any hot loads, to ensure they are kept away from other wastes and prevent fire spreading. Wastes will be managed and removed as soon as possible to keep the quarantine area available for use.
- 11.1.4 Secondly, in the event of a fire, waste may be moved to the quarantine area, to prevent fire spreading, by moving cooler waste away from burning wastes, or to facilitate extinguishing the fire by allowing a wider area in which to cool or smother the waste (assuming that it can be moved safely and this will not increase the risk of fire spreading).
- 11.1.5 The quarantine area comprises of impermeable surfacing and drains to a sump to capture firewater if waste is required to be extinguished.

12 FIRE DETECTION

12.1.1 Staff will remain vigilant and a fire watch will take place during and following hot works and at the end of the working day.

12.1.2 In addition, an infra-red fire detection system will be in place above the waste bays. Where this detects an increase in heat the Company Control Room will be automatically notified and the water canon will be automatically triggered.

12.1.3 Fire detection systems will be certified to UKAS accreditation standards.

13 SUPPRESSION SYSTEMS

13.1.1 Water spray deluge canons will be located in the roof of the building. These will be directed towards the waste storage bays where combustible waste is stored.

13.1.2 The water canon can be operated in multiple ways; a control panel at the site entrance; remotely via the control room; or automatically by the infrared heat detection system.

14 ACTIVE FIREFIGHTING

14.1.1 A member of staff will act as the trained fire warden and will give a lead in managing any incident involving a fire. The priority will always be to ensure personal safety and to ensure the building is evacuated and staff are protected.

14.1.2 Active firefighting may also be employed where it is safe to do so. Fire extinguishers will be located in accessible locations around the building.

14.1.3 Fire extinguishers will be used only by staff trained in their proper use.

14.1.4 Where it is safe to do so, the fire extinguishers will be deployed to extinguish small fires.

15 WATER SUPPLY

15.1.1 To ensure an adequate water supply, a firewater storage tank has been installed. The tank has been sized based on the need to provide a three hour water supply for fire suppression.

15.1.2 Firewater requirement has been calculated using the Environment Agency methodology, and is shown in Table 15.1 below.

Table 15.1: Calculation of Fire Water Requirement			
Maximum pile size (m ³)	Water supply needed (litres/minute)	Overall water supply for 3 hours in litres	Total water available on site in litres
300	300 x 6.67 = 2,001	2,001 x 180 = 360,180	Available 360,000 litres in tank, supplemented by mains supply and recirculation

15.1.3 Because space is limited the tank has been sized to hold 360m³, which provides an adequate water supply. During a fire, if required, the tank will be refilled from the mains supply. This will be supplemented by a pump in the floor sum, so that the tank can also be replenished by recirculating used fire water.

15.1.4 Because the tank can be refilled as the water is being used, adequate water should be available to allow 3 hours of fire fighting in the largest stockpile.

16 MANAGING FIRE WATER

- 16.1.1 The building has an impermeable concrete floor which is designed to drain towards a sealed sump. The sump will have a capacity of 106m³.
- 16.1.2 The remaining water will be held within the footprint of the building. The building footprint is 30m by 38m. There is a speed hump at the entrance of the building which is 0.09m high. Therefore the building will be able to contain 102.6m³. It is estimated that 90% of the building floor will be available to hold firewater, taking into account bay walls and equipment bases, and the retaining wall, which provides 92.34m³.
- 16.1.3 The total volume of fire water to be contained with the sump and the floor of the building is 194.94m³.
- 16.1.4 As the water hits the hot waste, it is expected that a minimum of 25% of the water would be evaporated. A further 12% would be absorbed into the waste. Therefore if 360m³ of water is used for firefighting, 226m³ would need to be contained.
- 16.1.5 The building and sump provide 86% of the required containment capacity. The additional required capacity will come from firewater being recirculated back into the firewater tank. These measures are therefore believed to be adequate to minimise any loss of contaminated firewater into the environment.

17 DURING AND AFTER AN INCIDENT

17.1 Dealing With Issues During a Fire

17.1.1 In the event of a fire, the fire warden will ensure the building has been evacuated safely and liaise with the Fire and Rescue Service to aid safe access for firefighting. They will keep the site manager informed of what is happening.

17.1.2 The site manager will contact the Environment Agency and Valencia's senior managers to advise them of the fire.

17.1.3 No further wastes will be accepted on site. Customers will be contacted and will be directed to another of Valencia's sites or, if necessary, to another permitted facility.

17.1.4 The site will remain closed until the residues have been cleared, the building has been made safe and plant has been repaired or replaced.

17.2 Notifying Residents and Businesses

17.2.1 Should it be necessary to contact local residents in the event of an emergency, a list of telephone numbers is maintained securely in the site office. A call will be made to residents where they need to take precautions due to an incident on site.

17.2.2 For more general communication, residents are offered the opportunity of a liaison group and meetings are held at a frequency led by the local community.

17.3 Clearing and Decontamination After a Fire

17.3.1 A building inspection will be made by a competent engineer to determine whether the building is safe and appropriate repairs will be scheduled.

17.3.2 Firewater will be tested to determine levels of contamination and arrangements will be made for it to be collected by tanker and disposed of at a suitably permitted site.

17.3.3 Residues may remain in place for a short time whilst the site is made safe and any required investigation into the cause of the fire is carried out.

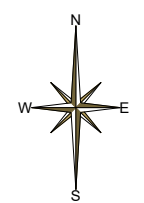
17.3.4 Once it is safe to do so, residues will be removed and appropriately disposed of and the site will be cleaned.

17.4 Making the Site Operational After a Fire

17.4.1 Once the building is made safe and firewater has been cleared, plant and equipment will be inspected by a qualified engineer and arrangements will be made to repair or replace as necessary.

17.4.2 The building will be opened to waste deliveries once it is safe, residues have been cleared and plant and infrastructure has been repaired to the extent that waste can be received and managed without risk to the environment

DRAWINGS



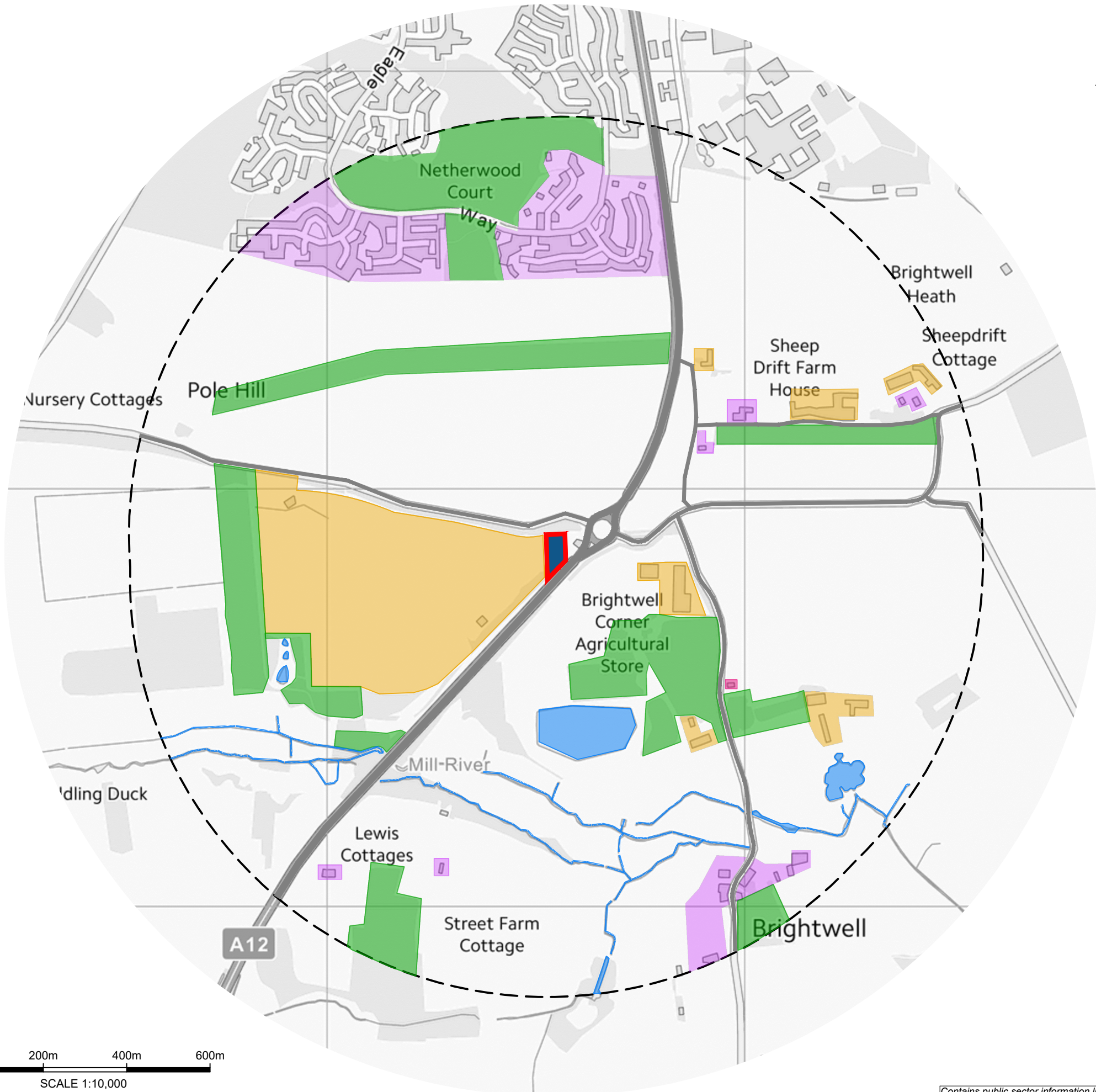
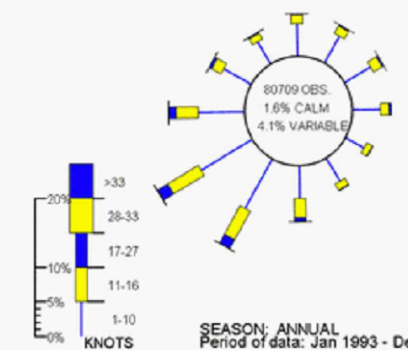
SITE NAME FOXHALL LANDFILL	
DRAWING TITLE MATERIALS RECYCLING FACILITY LAYOUT	
DRAWING NUMBER FOX-MRF001	
TASK NUMBER 21465	
SCALE 1:500 @ A3	REVISION
OIDRN R.L.Meaden	R/IDRN
Q/DATE 03.08.2023	R/DATE
Q/APP L.Edmonds	R/APP
Q/DATE 03.08.2023	R/DATE
INFORMATION TAKEN FROM	
SURVEY SERVICES MASTER FILE FOX-MRF2000	
OTHER DRAWINGS	

DO NOT SCALE FROM THIS DRAWING

REFERENCE

- SITE BOUNDARY
- 1KM BOUNDARY OFFSET FROM SITE
- COMMERCIAL / INDUSTRIAL RECEPTORS
- RESIDENTIAL RECEPTORS
- DECIDUOUS WOODLAND (PRIORITY HABITAT)
- LEISURE
- SURFACE WATERS
- MAJOR ROAD

WIND ROSE FOR NORWICH AIRPORT
N.G.R: 6221E 3138N ALTITUDE: 36 metres a.m.s.l.



A	FIRST ISSUE	14/09/23	SJB	DD	AC
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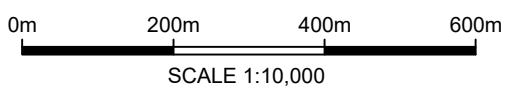
REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
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CLIENT
VALENCIA WASTE MANAGEMENT LTD

PROJECT
MRF AT FOXHALL, SUFFOLK

DRAWING TITLE
FOXHALL MRF RECEPTOR PLAN

DRG No.	ST20399-002	REV	A	SUIT. CODE	
DRG SIZE	A3	SCALE	1:10000	DATE	26-07-23
DRAWN BY	DR	CHECKED BY	DD	APPROVED BY	AC



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