



Fire Prevention Plan

BLAISE FARM WASTE TRANSFER STATION
ENVIRONMENTAL PERMIT APPLICATION

ENVAR COMPOSTING –VERSION 1
DECEMBER 2025

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1.0 INTRODUCTION

Envar Recycling Limited has prepared a bespoke Environmental Permit (EP) application for the proposed Waste Transfer Station (WTS), located in Blaise Farm Quarry , ME19 4PN, hereafter referred to as the 'Site'.

The facility is proposed to be a new facility on the companies owned land, adjacent to the businesses other facilities

This report follows the Environment Agency (EA) guidance for FPPs¹, and details the required mitigation and management methods to prevent a fire of combustible materials stored on Site.

The information contained in this FPP aims to meet the 3 main objectives of the EA's FPP Guidance:

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

Under current fire safety legislation², a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient fire risk assessment of the risks of fire to employees and others who may be affected by the site. A Fire Risk Assessment will be conducted before operations commence on Site and will be kept at the facility available for review at any time.

The Site is proposed to be completely redeveloped, as such the Site as it will be is not yet built, and therefore once the final detailed design of the WTS is finalised and agreed upon, the FPP will be fully updated to reflect.

2.0 TYPES OF COMBUSTIBLE MATERIAL

2.1 Combustible Waste

It is proposed that the site will accept up to 50,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 10,000 tpa) including nappies and sharps.

A maximum of 2,500 tonnes of waste will be stored on Site at any one time.

The proposed Site layout is illustrated on The Site Layout Plan.

It is proposed that the following waste types will be accepted on Site, which are defined as 'combustible materials' in the EA's FPP Guidance:

- Green waste;
- Paper and cardboard;
- Mixed (comingled) waste;
- Bulky waste;
- Residual waste;
- Clinical Waste;

¹ [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits), Updated January 2021

² Regulatory Reform (Fire Safety) Order 2005

- Textiles; and
- Plastic.

The full proposed waste list is included in the Operating Techniques (OT) document, which is included within Section 4 as part of this EP variation application.

2.2 Persistent Organic Pollutants (POPs)

Waste containing POPs will be identified as part of ENVAR's Waste Acceptance Procedures (WAP) and will be segregated from non-POPs waste and stored separately, under cover within the designated 'Bulky' storage area within the WTS building. The storage area is illustrated on the site layout drawing. POPs waste will not be treated on Site only bulked up and transferred.

In the event of a fire on Site, ENVAR would make the Fire and Rescue Service (FRS) aware that wastes containing POPs are present on Site, and where they are stored. If there is a fire involving POPs waste, then any residue will be segregated and treated following POPs regulations, including any and all firewater.

2.3 Other Combustible Materials

The Site will store non-waste materials that are not covered by the FPP Guidance but are considered in this FPP due to the potential for them to cause or increase the impact of a fire on the Site. The combustible materials and volumes of these are unconfirmed at time of writing. This FPP will be updated with this information when it becomes available.

3.0 USING THIS FPP

3.1 Where the Plan is Kept and How Staff Know How to Use It

A copy of this FPP will be kept in the Site office, located next to the weighbridge located outside of the proposed EP boundary as illustrated on The Site Layout Plan, and a copy will be held on ENVAR's Public Drive on its business management software system accessible by all staff. In addition, hard copies will also be issued:

- To all managers and supervisors at the Site;
- To ENVAR Compliance Team;
- To The Fire and Rescue Service;
- On the Health & Safety notice boards in all Welfare Units;
- As part of the induction pack for all staff employed to operate the facility, and for all third-party contractors working at the Site.

All staff will be made aware of the contents of the FPP and procedures that are in place in the event of a fire on Site during their induction and through periodic refresher training. Contractors working on Site will be made aware as part of on-Site working procedures. This will ensure that all staff and contractors working on site know what they must do:

- To prevent a fire happening; and
- During a fire if one breaks out.

3.2 Testing the Plan and Staff Training

3.2.1 Staff Training and Procedures

All staff will receive training on the identification of signs of a fire or potential signs, the use and selection of fire extinguishers, fire evacuation, fire safety, the use of the IR gun, and all relevant emergency procedures, in addition to training according to their individual duties. A training package will be provided to all new Site operatives by suitably qualified persons and overseen by externally appointed, Fire Safety and Training advisors. The training will be refreshed regularly, and more frequently in the event of fire, any changes to the FPP, or in the event of non-compliance to ensure the Site operatives have up to date knowledge of procedures.

All staff and contractors working on Site will be made aware of the contents of the FPP and the procedures that are in place in the event of a fire on site during their induction.

Certain staff members on Site will receive enhanced training to become designated Fire Marshals. There will always be at least one Fire Marshal present on Site, during operational hours.

The procedures for fires discovered on Site will be provided on-Site notice boards.

ENVAR will review the FPP once a year, or in the event of any significant changes to Site operations to ensure that the contents are still relevant and that all staff members' knowledge is current and up to date. Exercises include what staff need to do to prevent a fire occurring and what to do during a fire if one breaks out.

3.2.2 Testing the FPP

This FPP will be implemented across the Site and all fire management equipment will be tested on an annual basis and maintained in line with schedules set by ENVAR's maintenance procedure, and the manufacturer's specifications.

A fire drill will be carried out and documented on a 6 monthly basis.

If any issues are found during these fire drills, the FPP will be updated or amended accordingly, and Site operatives will be re-trained.

Regular checks will be made of all escape routes and equipment.

The FPP will be kept under regular review and revised where necessary, for example if:

- There is a reason to suspect it no longer meets the FPP objectives;
- The Site has a fire or identifies a near miss of a fire;
- On Site activities/operations are changed;
- The environment surrounding the Site changes; or
- The EA ask ENVAR to revise the FPP due to concern over the risk posed by on Site operations.

4.0 FPP CONTENTS

4.1 Activities at the Site

ENVAR are proposing to completely re-develop the Site and apply for a modern style permit.

It is proposed that the Site will accept up to 50,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 10,000 tpa) including nappies and sharps. Waste will be accepted on Site to the new WTS building, for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Treatment on the Site will only consist of manual sorting, and separation, storage, bulking up and transfer off site for further recovery/disposal.

The proposed Site will consist of a new WTS building, housing designated concrete bays, and containers for the storage of waste including street sweepings, clinical waste, bulky waste, co-mingled recyclable materials, plasterboard and wood, paper and cardboard, residual waste, garden waste and food waste.

The quarantine area will be located inside the building.

Clinical waste will be stored within designated bays/containers inside the WTS building, as illustrated on The Site Layout Plan. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout. The sealed Drainage shall have no point source emission, the falls on the sites shall be away from the doors and towards the centre of the building with a raised cast in or kerbed and sealed edge to the building to enable containment of any water used inside the building.

There will be no treatment of clinical waste on Site, only storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Clinical waste will be stored for a maximum of 7 days.

4.1.1 Specified Waste Management Activities

The activities that will be carried out at the proposed Site as defined under Annex II of the Waste Directive Framework can be summarised as follows:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents;
- **R4:** Recycling or reclamation of metals and metal compounds;
- **R5:** Recycling or reclamation of other inorganic materials;
- **R13:** Storage pending recovery or disposal.
- **D9:** Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13.
- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

4.2 Site Plan

The Site's location is illustrated on the site location drawing, and the EP Boundary and Site Layout are illustrated in The Site Layout Plan. Local receptors within a 1000m radius of the Site are shown on the site setting plan.

4.3 Plan of Sensitive Receptors Near the Site

The area surrounding the Site comprises predominantly agricultural / open land and commercial / industrial premises. There are several designated ecological habitats within 2km of the Site, including a SSSI at 1.6km distance.

The Site is accessed via the New Years Green Lane which runs approximately 100m north of the Site. The closest residential receptors are along New Years Green Lane situated approximately 150m north-west.

Local receptors within a 1000m radius of the Site are shown on the site setting plan and sensitive receptors plan which may be found in the EWC code odour risk assessment.

Table 1 below summarises the surrounding land uses.

Table 4-1: Surrounding Land Uses

Boundary	Description
North	Adjacent to the north is mainly agricultural and woodland with an events venue located to the north also.
East	Immediately to the east lies a large area of woodland and agri land and eventually residential areas
South	Woodland for nearly 1000m followed by the commercial part of Kings Hill including commercial units and supermarkets/office space
West	A quarry for ragstone is active to the West followed by over 1000m of woodland

The immediate surrounding land uses are described in further detail below. Receptors are considered in further detail within the Environmental Risk Assessment (ERA) completed as part of the EP variation application.

4.3.1 Agricultural / Open Land

The area surrounding the Site comprises predominantly agricultural / wood land. The Site is bounded on the southern EP boundary by woodland.

4.3.2 Commercial and Industrial

Within 1000m of the Site, there are commercial / industrial premises, the closest are as follows:

- Adjacent to the Site's western boundary lies a commercial premises belonging to Ghallagers Quarries Limited
- Adjacent on the Site's eastern boundary is a recycling centre operated by Envar, a ENVAR sister company

4.3.3 Residential

There are a limited number of residential properties within 1000m of the proposed Site. The closest residential receptor is situated approximately 800m NorthEast of the Site.

4.3.4 Local Transport Network

Kings Hill Roundabout is located approximately 1000m from Site's northern EP boundary to the south of the site, and is the only major road nearby

4.3.5 Surface Water Features

There are a number of surface water features within 1000m of the Site, including a lake to the north of the site, and a stream. The site is however 10m below ground level and below these features due to it being located at the base of the old quarry so there is no possibility of runoff into these features. However they are laid out on figure 1 below for reference.

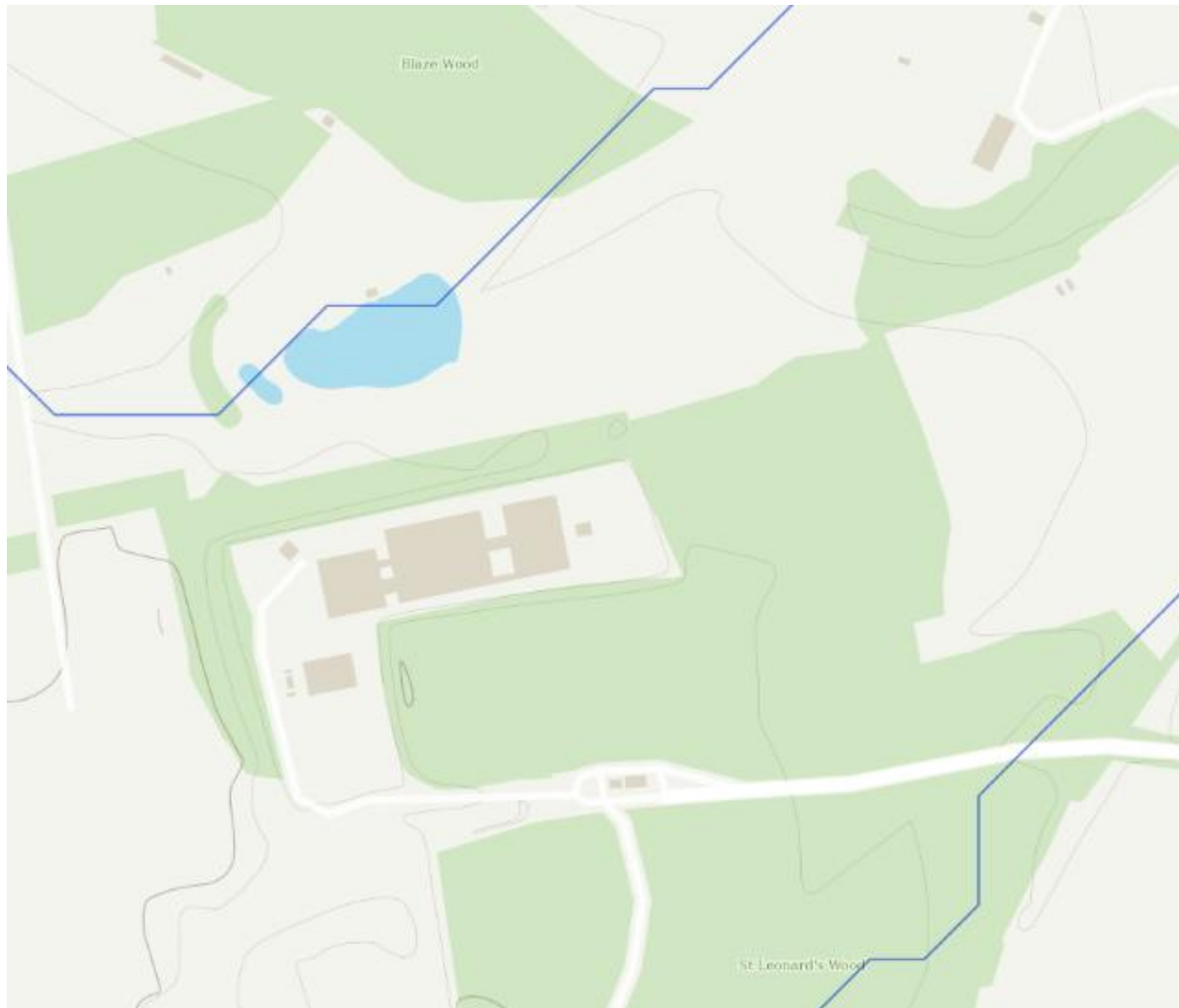


Figure 1 - Local water features from the FEH webservice

4.4 Receptors

The site setting drawing identify the receptors which are considered to be potentially sensitive and could reasonably be affected by activities at the site.

4.5 Windrose

A wind rose for the site comes from the meteoblue weather estimation model for kent. The windrose shows southerly and south westerly winds are most common.

Wind rose

Kent

47.38°N, 122.23°W (13 m asl).
Model: ERA5T.

meteoblue

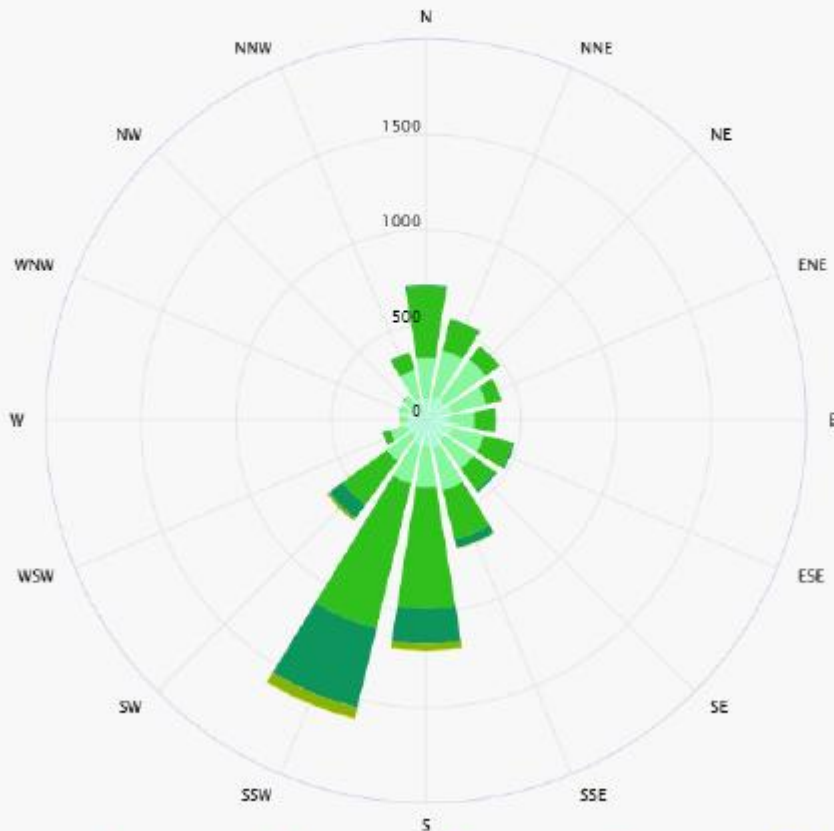


Figure 2 - Windrose for Kent

5.0 MANAGE COMMON CAUSES OF FIRE

5.1 Arson

The Site will benefit from the following security measures in place to limit the likelihood of arson or vandalism:

- The site will be manned during operational hours by Site staff who will undertake regular inspections of the Site;
- An internal and external CCTV monitoring system which can be monitored remotely; and
- The site is surrounded by a natural 10m deep “wall” as it is in an old quarry. The only entrance is gated with security access shared with ghallegers quarries.

All visitors to the Site (other than those delivering waste) will be required to report to the Site office on arrival and to sign the visitor’s book.

The Site will be visually inspected by Site operatives at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosures will be made secure by temporary repair by the end of the working day. Permanent repairs will be affected as soon as practicable. All inspections, any defects, damage or repairs will be recorded in the Site Diary.

The Site will be manned by Site operatives during operational hours.

CCTV will cover operational areas and is monitored regularly by Site operatives during operational hours. Outside of operational hours, the CCTV can be monitored remotely. If a breach in security is detected by Site operatives / the out of hours the remote monitor would contact the Site Manager and emergency services as appropriate, both inside and outside of operational hours.

In the event of a breach of security at the Site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the site diary. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken. Should additional security measures appear necessary these will be discussed in advance with the EA.

5.2 Plant and Equipment

Plant and equipment will be maintained in accordance with the manufacturer’s recommendations and ENVAR maintenance procedure. ENVAR operates a policy of regular replacement of critical plant and machinery. All new plant on site will be fitted with telematics, which will automatically highlight any faults, and local suppression as part of the minimum design specifications. All mobile plant and machinery (single agent only to clamp trucks) will be fitted with fire extinguishers and dual agent fire suppression systems incorporating battery isolator and machine engine shut down functions.

Plant and equipment will be operated in accordance with the manufacturer’s instruction manuals. Instruction manuals for plant and equipment will be held either on Site or online if a hard copy is not available from the manufacturer.

Induction training and refresher training will be provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with the Operating Techniques (OT) document.

Inspection of plant and equipment will be undertaken on a daily basis, at each shift change to check for faults and ensure appropriate safeguards are in place and recorded in the Site Diary. The procedure also covers general housekeeping and cleaning of plant and all equipment on Site.

In addition, plant and equipment will be visually inspected prior to every use to ensure it is fit for purpose.

In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.

Any mobile plant not in use or requiring maintenance is temporarily stored in the designated area of the Site, by the weighbridge as illustrated on The Site Layout Plan. The weighbridge is located outside of the proposed EP boundary.

5.2.1 Mobile Plant

The full list of mobile plant to be held on Site will be confirmed once the Site is fully operational.

The mobile plant storage area is located by the weighbridge as illustrated on The Site Layout Plan.

5.2.2 Fixed Equipment

There will be no fixed plant permanently on Site.

In summary, the following provisions will be implemented:

- Plant maintenance schedules using the manufacturer's recommendations;
- Pre-use checks prior to using any plant or equipment;
- Reporting of defects and actions taken based on priorities;
- Daily cleaning to remove any dust build up from vulnerable areas;
- All vehicles on-Site will be fitted with portable fire extinguishers; and
- Mobile plant will be kept away from combustible waste.

5.3 Electrical Faults

5.3.1 Electrics Certification

All electrics on site will be fully certified by a qualified electrician and a record of the certification will be kept.

The following measures will be in place:

- BS7671 fixed electrical wiring testing will be taken every 1 – 3 years or as per the recommendations of a qualified industrial electrician (parts of the facility may require more frequent inspection than others)
- Only fire rated LTFB10 and LTFB70 LED lighting will be used;
- Control panels to all plant and machinery in the WTS building will be tested annually and cleaned down daily; and
- The site is not handling any equipment or materials which could cause a dangerous atmosphere and trigger the DSEAR regulations. Should this change a full DSEAR Risk Analysis shall be undertaken

5.3.2 Electrical Equipment Maintenance Arrangements

Regular safety inspections will be carried out by a qualified electrician to ensure risks are minimised. Electrical equipment will be regularly inspected prior to every use to ensure it is free from obvious damage and that it is fit for purpose. Regular safety checks and daily site inspections will be recorded in the Site Diary. All building electricians will be fully certified by a qualified electrician.

Annual PAT testing of any on-Site portable electrical appliances will be carried out.

5.4 Discarded Smoking Materials

ENVAR has a no smoking policy which means there will be no smoking in the proposed Site. The Site Manager will be responsible for ensuring that this is implemented on Site.

5.5 Hot Works Safe Working Practices

It is unlikely that hot works will be required on Site. However, should hot works be required ENVAR will operate a permit to work system in accordance with ENVAR's Health and Safety Safe Working Procedures and SHEQ procedures. The permit to work system will include a 30-minute fire watch by a competent person at the end of the works, with intermittent return inspections over the following 2 hours. No hot works will be undertaken by staff unless they are trained and have the relevant permit to work.

Any hot works will be carried out in a cleared area of the Site at least 6m from any combustible waste. A Site operative will perform a continuous fire watch during the hot work.

5.6 Industrial Heaters

All welfare buildings will be located at least 10m away from waste storage areas. No portable heaters will be utilised on Site, and there will be no heating within the WTS building.

The Site Management will ensure that any heating in the welfare areas is switched off when the area is not in use.

5.7 Hot Exhausts and Engine Parts

Vehicles will be turned off when not in use. Consideration will be given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces) and wherever possible vehicles are given time to cool down prior to site staff leaving site at the end of a shift.

Vehicle operatives will conduct an inspection of each vehicle at least once a day and record any findings in the Site Diary. Operatives will check the cleanliness of the plant paying particular attention to any build-up of dust or waste around the engine and exhaust.

5.7.1 Fire Watch Procedures

A 1-hour fire watch will be undertaken at the end of every shift where all mobile plant will be switched off and exhausts will be checked to ensure they are cool and that no dust has settled. Where possible, mobile and static plant will be switched off at least 30 minutes before the last person leaves the Site and the Site manager ensures that an inspection of all waste storage areas is undertaken looking for any signs of fire.

5.8 Ignition Sources

Potential ignition sources will include hot exhausts and engine parts, heaters, and hot works (all described above). All ignition sources will be kept a minimum of 6m away from the storage of combustible and flammable wastes. No naked lights will be permitted on Site.

5.9 Batteries

The proposed Site will not be permitted to accept, segregate and store waste batteries. Any batteries discovered in waste loads following acceptance to the Site will be removed and placed within the quarantine area (as illustrated on The Site Layout Plan) prior to removal from site to an appropriately permitted facility for recovery or disposal. Within the quarantine area, batteries will be placed within a designated battery box.

To ensure that only permitted wastes are accepted on Site, and that batteries are not accepted in the incorrect load, the Site implements strict waste acceptance procedures. All vehicles bringing waste material to the Site will report to the weighbridge or the Site office for visual inspection, following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by Site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation. Should waste batteries be identified within the waste stream during visual inspection, they will be removed and placed in a designated area.

5.9.1 Batteries in ELVs

The Site will not accept ELVs therefore this section is not applicable.

5.10 Leaks and Spillages of Oils and Fuels

Plant and equipment will be maintained to a high standard in accordance with the manufacturer's recommendations. All mobile plant will be inspected at least daily to identify potential defects that could lead to a leakage of fuel across the Site. Vehicle operatives will record any findings and actions in the Site Diary.

Inspection of any spillages or leaks from containment will be completed at least daily by Site operatives. The results of all daily and weekly monitoring will be recorded in the Site Diary, as well as any remedial actions.

In the event of any potentially polluting leak or spillage occurring on Site the protocol found within the following actions will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the Site diary.
- Any dry wastes spilled on Site will be collected and transported to the appropriate area of the Site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

All staff will be trained on spillages and the use of spill kits, which will be available throughout the Site, in the event of a spillage or leak on Site.

5.11 Build-up of Loose Combustible Waste, Dust and Fluff

The risk of the build-up of combustible waste, dust and fluff is low due to the following measures implemented on Site:

- The site will be operated in accordance with the Dust Management Plan (DMP)

- Waste will be stored within designated bays inside the WTS building and enclosed skips outside of the WTS building;
- Speed limits will be implemented on Site for all vehicles to minimise the mobilisation of particulates;
- All incoming waste will be offloaded in close proximity to the storage areas to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;
- All plant and equipment will be subject to a programme of planned preventative maintenance which follows the inspection and maintenance schedule recommended by the manufacturer and ENVAR's maintenance procedure. This will include corrosion prevention where applicable;
- The Site will benefit from good housekeeping and all areas will be cleaned on a daily basis. Waste storage areas will be inspected on a weekly basis by the Site Supervisor and cleaned as necessary;
- Site access roads and operational areas will be maintained and swept regularly to reduce dust generation; and
- Daily visual inspection of the site and site boundary will be carried out by Site personnel.

5.12 Reactions Between Wastes

The Site will not accept waste types which are potentially incompatible with each other. To ensure that incompatible materials are not received on Site, the Site will implement strict waste acceptance procedures to ensure the waste is as expected and that it can be accepted at the Site.

All vehicles bringing waste material to the Site will report to the weighbridge or Site office for visual inspection following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by Site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation. Any non-conforming waste that is received will be rejected or removed to the designated quarantine area, and the details will be recorded.

Tanks containing fuel will be constructed so that any leaks / spillages are contained. Tanks will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest tank within the bund. Bunds will be impermeable and resistant to stored materials.

5.13 Waste Acceptance and Deposited Hot Loads

No burning, reactive/reacting or visible hot (producing steam or heat) loads will be accepted on Site. In accordance with the Site's waste acceptance procedures, all waste will undergo visual inspection at the weighbridge / Site office and during deposition within the WTS building, therefore minimising prohibited waste and the acceptance of hot loads.

Instructions are given to suppliers to ensure no hot loads are accepted on Site.

Should a hot load be deposited on Site, it will immediately be removed to the dedicated quarantine area and extinguished immediately using a fire extinguisher. Any fire damaged waste will be removed from Site within 48 hours to a suitably licenced facility for disposal.

5.14 Hot and Dry Weather

During periods of extreme hot weather (defined as temperatures higher than 25°C on two consecutive days) the following actions will be carried out:

- Concentrated beams of sunlight or glare reflected onto stockpiles through surfaces will be minimised;
- Visual inspections of waste storage areas will be increased to four times per shift.

6.0 PREVENT SELF-COMBUSTION

6.1 General Self-Combustion Measures

Self-combustion of waste on Site is not considered to be a significant risk due to effective stock management, the short storage times (maximum 5 days) and because waste is segregated into dedicated storage areas. As such, the Site will have waste acceptance and stock management procedures which will be upheld by all employees at the Site.

The controls that will be in place to reduce the risk from fire are summarised as follows:

- All waste deliveries will be checked upon deposit within the WTS building. Checks will include both the paperwork and the full contents of the load. If the waste is found not to conform it will be removed to the quarantine area;
- No loads will be removed from the site without an onsite operative in supervision;
- A visual fire watch will be performed as the loads are received and unloaded;
- A quarantine area will be kept available;
- Waste storage times will be minimised;
- Risk factors (e.g. mixing of materials) will be reduced by the segregation of waste within separate storage areas;
- Daily inspections of waste storage areas will be undertaken to ensure material is contained within the bay, the maximum height is not exceeded and that no prohibited items are present;
- Waste will be handled in accordance with a safe system of work. On site personnel will be instructed and trained on the safe system of work.

Only wastes included in the EP will be accepted at the Site.

Non-waste materials that pose a risk of self-combustion are stored as indicated in Table 2-1.

6.2 Manage Storage Time

ENVAR implement stock management procedures to limit the likelihood of self-combustion of materials stored on Site. Under normal operating conditions, waste is stored and moved as per the timescales in the OTMP

The Site will adopt and implement a first in, first out system.

6.2.1 Method Used to Record and Manage the Storage of all Waste on Site

All vehicles bringing waste material to the Site will report to the weighbridge or Site office following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by Site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation.

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge. A register of the quantities and characteristics of waste accepted on Site will be maintained on a computerised database. The system will also operate as the waste inventory and stock control system. The system will include the following information as a minimum:

- The date the waste arrived on Site;
- The original producer's details (or unique identifier);
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;
- The nature and quantity of wastes held on Site;
- Where the waste is physically located on Site;
- Where the waste is in the designated recovery process;
- The staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;
- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

Suitably qualified personnel will carry out daily checks of the Site to identify the risks and inspect storage areas and stack height. This will ensure that the Site does not reach a level of overcapacity in respect of storage.

6.2.2 Stock Rotation Policy

Arrangements on Site will ensure that a 'first in first out' approach is adopted so that the storage of waste does not exceed the prescribed duration. The Site Manager will be responsible for stock rotation on Site and will ensure that waste with the earliest storage dates is removed from Site first. This will be managed via the waste inventory system,

6.3 Monitor and Control Temperature

6.3.1 Monitoring Temperature

The Site is continually manned during operational hours. Site operatives will be trained to remain vigilant at all times and look out for signs of fire. Staff will be trained how to identify fires and fire hazards on Site. Staff will also receive training on the use and selection of fire extinguishers, Site evacuation, and shut down procedures, fire safety, and all relevant emergency procedures.

On a 2 hourly basis during operational hours, Site operatives visually inspect the storage areas for any anomalies such as visual signs of heat, steam or vapour. Site operatives will use an IR gun to scan each stockpile, and monitor and record the temperature, as part of the inspections. Anomalies will be actioned immediately by investigation and remedial action will be taken such as rotation of the waste within the storage area or removal of heated waste, which will be put into the quarantine for assessment.

In addition, the WTS building will benefit from an automatic detection system, which will constantly monitor the waste storage areas for any anomalies.

6.3.2 Controlling Temperature

The following actions will be taken to control temperature, reduce the risk of hot spots, and to minimise the risk of self-combustion within waste storage areas:

- Waste storage times will be minimised by using a first-in-first-out principle and all waste is stored for a maximum of 5 days under normal operating conditions before removal from Site;
- Bays will be sized according to the minimum required for operational efficiency;
- The waste tracking system will allow for real time management of waste storage times and will be used daily to assess the quantity of waste awaiting treatment and the amount due to be removed from Site;
- Hotspots will be detected and controlled by 2 hourly visual inspections using an IR gun during operational hours, and the Helios automatic detection and suppression system;
- Waste will be regularly moved and removed from the Site within a maximum of 5 days under normal operating conditions. Therefore, due to the nature of operations on Site, waste will be routinely turned releasing any heat generated within a pile.

6.3.3 Dealing with Hot Weather and Heating from Sunlight

Please see Section 5.14 above for the measures that will be taken during periods of extreme hot weather.

6.4 Waste Bale Storage

No waste bales will be held on Site, therefore this section is not applicable.

7.0 MANAGE WASTE PILES

All waste storage inside of the WTS building will take place on impermeable surfacing with a sealed drainage system. The waste storage areas are discussed further below and illustrated on The Site Layout Plan.

7.1 Storing Waste Materials in their Largest Form

The Site will operate as a WTS for the acceptance, storage, and bulking up of waste prior to export to an alternative suitably permitted facility for further recovery / disposal.

There will be no waste treatment undertaken on Site, apart from manual sorting, and separation, storage and bulking up prior to onward transfer.

Therefore, all waste will be stored in its largest form.

7.2 Maximum Pile Sizes for the Waste on Site

The proposed waste storage areas are described in Table 7-1 below and illustrated on The Site Layout Plan. Non-combustible material types are shaded grey in the table below and are included for completeness but are not subject to the FPP guidance requirements. A 1m freeboard will be maintained at the top and sides of the bay walls at all times to prevent fire spreading.

Table 7-1 Storage Areas: Waste Types and Dimensions

Waste Type	Max Length (mm)	Max Width (mm)	Max Height (mm)	Max Volume (m ³)	Max Storage Time (days)
Sweepings	8780	5000	2000	44	28
Clinical / Offensive	8780	5000	4000	175	7
Bulky	8780	5000	4000	175	28
DMR	8780	5000	4000	175	28
Plasterboard / wood	8780	5000	4000	175	28
Residual	8780	5000	4000	175	28
C&I	8780	5000	4000	175	28
Food	8780	5000	2000	44	7
Haz Soils	8780	5000	2000	44	14
Asbestos (Enclosed 40yd skip)	5.8	2.2	2.5	Max total hazardous waste on site < 50 tonnes	180

Waste Type	Max Length (mm)	Max Width (mm)	Max Height (mm)	Max Volume (m ³)	Max Storage Time (days)
Tyres (Enclosed 40yd skip)	5.8	2.2	2.5	31.9	180
Metal	8	6	4	192	180

8.0 WASTE STORED IN CONTAINERS

8.1 Types of Containers

The Site will store waste in the following containers:

- Clinical waste will be stored in bins within the clinical waste / offensive bay;
- Batteries will be stored within a designated battery box container in the quarantine area; and
- Tyres, asbestos and metals will be stored in separate enclosed 40yd container outside of the WTS building.

8.2 Accessibility of Containers

All containers on Site will be accessible from more than one side so that a fire could be quickly extinguished. The location of waste storage containers is illustrated on The Site Layout Plan.

8.3 Moving Containers in a Fire

In the event of a fire within a container, the Site's ability to move containers quickly would be utilised to reduce the risk of fire spread. The affected container would be moved immediately by site operatives, qualified in the operation of mobile plant, to the quarantine area. The following procedure will be implemented on site:

- When it is safe to do so, the waste containers will be moved by on Site plant to the quarantine area;
- The movement of the waste will be overseen at all times by the Site Manager to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- The burning / smouldering waste will be doused using the relevant fire extinguisher, a fire hose supplied by the fire service connected to the hydrant or water pumped from the fire engine; and
- Burnt waste will be taken off Site to a suitably licensed facility within 48 hours.

All Site operatives will be trained to follow this FPP and all procedures listed in the above sections.

9.0 PREVENT FIRE SPREADING

9.1 Separation Distances

Waste will be stored within bays as illustrated on The Site Layout Plan.

The waste storage bays will be separated by fire walls or at least 6m from each other, as illustrated on The Site Layout Plan.

Where there is no segregation provided by a firewall, the waste will be at least 6m from the perimeter, buildings and other combustible or flammable materials.

9.2 Fire Walls Construction Standards

The fire wall specifications are as follows:

- Have a fire resistance period of at least 4 hours;
- Class A1 fire resistance in accordance with clause 4.3.4.4 of BS EN 13369;
- Bay walls are 5m in height.

This FPP will be updated with fire wall construction information once ENVAR has confirmed which fire walls will be implemented on the Site.

9.3 Storing Waste in Bay

Table 7-1 above shows the maximum waste storage heights for the proposed Site. The following measures will be employed to minimise the risk of fire spreading:

- Waste storage times will be kept to a minimum;
- All waste will be processed on a first-in-first-out basis to keep storage times to a minimum;
- The specification and construction of the bays will offer a thermal barrier exceeding 4 hours;
- The bays will benefit from a freeboard of 1m and open faces will be located at least 6m from other sources of combustible materials to minimise the potential risk of lighted material igniting other wastes; and
- In the event of a fire occurring in a bay, the quarantine area will be used to segregate non-burning waste in order to isolate and minimise the potential impact of the incident.

10.0 Quarantine Area

10.1 Quarantine Area Location and Size

The Site will benefit from the availability of a designated temporary quarantine area. The area will be located within the WTS building, as illustrated in figure 3 below, and detailed in Table 10-1.

The quarantine area be located on an area which will benefit from impermeable surfacing and a sealed drainage system and will be large enough to hold at least 50% of the largest combustible stockpile on site, whilst maintaining a 6m separation distance from other combustible materials, and buildings.



Figure 3 - quarantine area

Table 10-1 Quarantine Area Dimensions

Quarantine Area	Primary Use	Length (m)	Width (m)	Height (m)	Volume (m ³)
Fire Prevention and Non-Conforming Waste	Dousing of burning/smouldering waste and/or separation of unburnt waste. Separation of non-conforming waste prior to removal from site.	12	6	4	288

The quarantine area will be sized to hold 50% of the largest waste stockpile, where the largest bay is the commingled waste bay which will have a maximum volume of 192m³, and therefore the

quarantine area can hold at least 288m³ of waste. A 6m separation distance will be maintained around all sides of the quarantine area at all times.

The placement of the quarantine areas has been based on the following factors:

- It will allow for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage areas and to allow access by the Fire & Rescue Service (FRS);
- Proximity to flammable liquids – the quarantine area will be situated at least 6m away from any potentially flammable liquids on site such as diesel tanks; and
- Firewater containment – any water used to extinguish a fire within waste moved to the area would be contained in line with the measures outlined in Section 15 below.

10.2 How to Use to Quarantine Area if There is a Fire

The Site Management will instruct all Site operatives when and how the burnt / burning waste, or any hot loads delivered accidentally to Site, will be moved to the quarantine area. The quarantine area can be used to hold burning waste or unburnt waste. The following procedure will be implemented on Site:

- When it is safe to do so, mobile plant will be used to move the waste to the quarantine area. Mobile plant is available at all times;
- The movement of waste will be overseen at all times by the Site Management to minimise any spillages and to ensure the area is not overfilled;
- To limit spillages, plant will not be overfilled when moving waste;
- If the waste is burning / smouldering it will be doused using the relevant fire extinguisher, a fire hose supplied by the FRS or water pumped from the engine;
- To prevent fire water entering surface waters, the duty manager would deploy mobile spill barriers/boom when required. Outside of operational hours, the duty manager would be contacted by mobile phone via the automatic detection system and would attend site within 1 hour to boom the entrances and prevent escape of fire water from the site. water could also be taken and stored in the storage system of the sites sister company who has tanks greater than 1000m³ available with permissive access (same ownership & management as ENVAR)
- Burnt waste will be taken off Site to a suitably permitted facility within 48 hours.

All Site operatives will be trained to follow this FPP and all procedures listed in the above sections.

10.3 Procedure to Remove Material Stored Temporarily if there is a Fire

In the event of a fire, any non-compliant waste will be removed from the quarantine area as is safe to do so and temporarily stored at least 6m away from any other combustible material or ignition sources on Site.

11.0 DETECTING FIRES

11.1 Detection Systems in Use

ENVAR propose to commission an appropriated qualified company to design, supply, install, test and commission the site's fire detection and alarm systems. The proposed fire detection system will utilise the appropriate detection equipment as advised by the fire protection company, which will follow the requirements of BAT and appropriate measures. The system will be designed to provide full coverage of the WTS building, which is where all waste storage will be undertaken.

If an alarm were to be triggered, during operational hours a suitably trained site operative would investigate the hotspot immediately and determine the best course of action if safe to do so. The control panel will indicate that there is a heat spot and the recommended BAT and AM (Appropriate Measures) compliant suppression system shall be used.

Out of operational hours, the nominated contacts (Site Manager, and ENVAR out of hours staff) will be alerted via mobile phone, suppression systems will be triggered. If a surface fire is detected the suppression system will automatically initiate.

Details of the proposed fire detection system will be added to this FPP once decided by ENVAR.

In addition, the proposed site will be operational within the hours of any planning permissions granted. During operational hours, the site will be constantly manned by operatives who are trained in the early detection and management of fires. Site operatives will visually inspect waste storage areas for any signs of anomalies such as signs of heat, steam, or vapour to ensure the early detection of fires in waste storage areas. Anomalies will be actioned immediately by investigation and remedial action will be taken such as the rotation of waste within the storage area or the removal of heated waste which would be put in the quarantine area for assessment. In addition, site operatives will be asked to remain vigilant at all times and look out for signs of fire. Staff will be trained in how to identify fires and fire hazards on site. Staff will also receive training on the use and selection of fire extinguishers, site evacuation procedures, fire safety, and all relevant procedures.

11.2 Certification for the Systems

The proposed fire detection system will be certified to British Standard BS5389. Certification will be added to this FPP once the applicable detection system has been chosen by ENVAR.

12.0 SUPPRESSING FIRES

12.1 Suppression Systems in Use

ENVAR propose to commission an appropriately qualified company to design, supply, install, test and commission the site's fire suppression system. The suppression system will be designed to be fully integrated with the detection system described in Section 11.1 above and will utilise a suppression system. The system will be designed to provide full coverage of the WTS building, which is where all waste storage is undertaken.

In the event of a fire, the suppression system would be activated, to allow for any potential fire to be automatically managed at the earliest possible stage through suppression.

Foam, water, carbon dioxide and powder extinguishers will be provided throughout the site, in addition to a fire hose. The extinguishers will be inspected annually. The local FRS will assume full control for the approach to suppression/extinguishing of any fire once it is in attendance at the site.

The WTS building will be constructed to the appropriate standards. Should fire compromise the stability or integrity, the building and site will be immediately evacuated.

12.2 Certification for the Systems

The proposed automatic fire detection system will be certified to British Standard BS5389. Certification will be added to this FPP once the applicable detection system has been chosen by ENVAR.

13.0 FIREFIGHTING TECHNIQUES

13.1 Active Firefighting

The closest fire station to the site is Larkfield fire station to the east of the site. Using Google³ directions and mapping, the drive time is approximately 9 minutes and it is approximately 3.6 miles between the site and the fire station. This attendance time is an indicative estimate only, and ENVAR understand that the wait time could be longer. As described in Section 11 and 12 above the site's automatic detection and suppression system will be capable of controlling a fire prior to the arrival of the fire rescue service (FRS). Site staff are also trained on the management of both small and large fires as described in Sections 13.1.2, and 13.1.3 below.

To ensure that the FRS can access the site outside of operational hours, a locked FRS Information Box will be fitted to the outside of the site gate which will contain site keys, and a copy of the FPP. The code to the box will be provided to the FRS to ensure that they will be able to gain immediate access to the site outside of operational hours.

The nearest fire hydrant is located at Kings Hill Industrial Estate and the fire services are aware of this.

There are 3 no. water tanks that hold a combined 1,452,000 litres of water. There are an additional two smaller water tanks that hold 40,000 litres and 60,000 litres respectively.

13.1.1 Firefighting and Fire Hoses

See section 12.1 for details on fire extinguishers and fire hoses. Fire extinguishers and/or hoses will be used in the following circumstances:

- Where operators are trained in use, and if confident to tackle the fire; and
- On very small fires, or to facilitate own escape if trapped by fire.

13.1.2 Small Fire

As detailed in Sections 11, and 12 above ENVAR propose to install an automatic fire detection and suppression system. Upon detection of a heat spot inside or outside of operational hours the automatic suppression system would be activated.

During operational hours, suitably trained site operatives will investigate the hotspot immediately and determine the best course of action. Potential courses of action could include:

- Utilising mobile plant to pull the affected waste into the open away from other waste that the fire could spread to;
- Depending on the size/nature of the fire the waste will either be:
 - Extinguished immediately⁴ utilising the fire extinguishers or hoses; or
 - Moved to the appropriate quarantine area and extinguished⁵.

Depending on the size, location and nature of the fire the burning waste will be pulled into the dedicated quarantine area following the procedures detailed in Section 10.2.

³ Google Maps, accessed in November 2024

⁴ Should a single item of the waste stream be alight, and the fire is well contained, then the waste will be doused via use of an extinguisher or fire hose as it is pulled from the waste pile. The burned / fire- damaged portion is then removed to the quarantine area and the remaining waste returned to the pile.

⁵ If the fire is not easily contained to a single item, then the obviously alight portion of the waste will be removed to the quarantine area.

Outside of operational hours, if an alarm were to be triggered the automatic fire detection and suppression system would contact the nominated contacts (Site Manager, and ENVAR out of hours staff) via mobile phone. The Site Manager and ENVAR out of hours staff would attend site within 1 hour. Once on site, staff would immediately deploy mobile spill booms to prevent any water from going into the attenuation pond, and deploy booms to block the WTS building entrance to ensure that water is contained.

All site staff have received an induction on the site, its operations, its layout, and firefighting procedures. Site staff would investigate the hotspot, and determine the best course of action, which could include the above measures as listed for inside of operational hours.

Once a small fire is dealt with the remaining area will be visually inspected immediately by site operatives for any signs that a fire/smouldering waste still remains. The same procedures, detailed in this section, will be implemented should this be the case.

Competent staff will be available throughout operational hours to operate waste handling plant.

13.1.3 Uncontainable Small Fire or Large Fire

The following procedure will be in place on site that will be followed in the event of a small fire becoming uncontainable or in the event of a major fire both inside and outside of operational hours:

- The automatic detection and suppression system will be activated.
- The Site Manager and FRS will be notified immediately and the EA as soon as practicable. Outside of operational hours the ENVAR out of hours staff would also be contacted, and would attend site within 1 hour;
- The Site Manager, and site operatives would immediately deploy booms to block the WTS building entrance to ensure that water is contained;
- Following arrival of the FRS, all site staff will take instructions from the FRS which may include any of the following:
 - If possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
 - If possible, unburned material will be separated from the fire using heavy plant;
 - The burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
 - The site and buildings will be evacuated.

14.0 WATER SUPPLIES

14.1 Available Water Supply

Sources of water available onsite are:

There are 3 no. water tanks that hold a combined 1,452,000 litres of water. There are an additional two smaller water tanks that hold 40,000 litres and 60,000 litres respectively.

The water tanks on site will have suitable connections to allow the FRS to connect directly to the tank to access water. The tanks will be permanently connected to feed the automatic suppression system.

The following additional water is available –

Clean surface water lagoon of roughly 1 million litres with permissive access

14.2 Water Supply Calculation

Based upon the EA's FPP Guidance firewater calculations, it is estimated that approximately 535,947.84 litres of water would be required to put out the largest combustible stockpile on the proposed site⁶.

Table 14-1 Fire Water Calculation

Maximum volume (m ³)	pile	Water needed (l/min)	supply	Overall water supply needed over 3 hours (litres)	Total water available on site and vicinity (l/min)
		Pile volume x 6.67		Water supply x 180	
192		1280.64		230515	1452000+1m

⁶ Based on a 197m³ stockpile being the largest combustible pile on the current site and it requiring 6.67 litres of water per cubic metre to extinguish.

15.0 MANAGING FIRE WATER

15.1 Containing the Run-Off from Fire Water

The WTS building will benefit from impermeable surfacing with a sealed drainage system. All firewater would be contained within the building. If necessary, mobile spill booms will be utilised to prevent the egress of water from the WTS building.

All waste storage will take place within the WTS building, and any water released from the suppression via the proposed automatic system or through firefighting will be contained within the building. Booms will be used to block the WTS building entrance and ensure that water is contained. Within operational hours, upon detection of a fire, site operatives will be responsible for placing the booms at the WTS building entrance. Outside of operational hours, the duty manager will be contacted by mobile phone via the automatic detection system and would attend site within 1 hour to ensure that the booms were deployed. Fire water contained within the building, would be drawn off into tankers and transported off site to an appropriate treatment facility following testing.

16.0 DURING AND AFTER AN INCIDENT

16.1 Dealing with Issues During a Fire

The site will not continue to accept waste if there is an active fire on site. If possible, waste producers will be notified in advance to prevent delivery vehicles arriving on site during and immediately after a fire.

16.2 Notifying Residents and Businesses

An emergency contact sheet will be included in Appendix A. In the event of a fire the following procedure will be followed:

- Nominated employees will be responsible for locating the emergency list included in Appendix A;
- In the event of a large fire, 999 will be dialled first;
- Nominated individual will phone each of the local businesses included in Appendix A to keep them informed followed by the sewage service if appropriate to do so; and
- Finally, the EA incident hotline will be dialled once the situation is under control.

16.3 Clearing and Decontamination after a Fire

After a fire event, the following procedure will be implemented depending on the severity of the fire:

1. A small and containable fire that can be safely dealt with in-house using suitably trained staff and firefighting equipment located on site: The fire will be recorded in the site diary, including the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.
2. A larger fire that requires the presence of the Fire Service: If the site operatives have been told to evacuate or cease operations by the EA and/or Fire Service, the site will wait until told safe to re-enter site and resume operations. Any closure of the site will be followed by informing customers and the regulatory authorities. The fire will be recorded and an online incident report will be completed to detail the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.

Should damage be sufficient to prevent the site from being able to store waste, the site will cease accepting waste and will divert to a suitably licensed facility, as described above.

The Site Manager will liaise with the EA to determine a plan-of-action to introduce normal operations at the site, and timescales involved to achieve this.

A visual assessment will be carried out by the Site Management and wherever possible, unburnt wastes will be separated from fire damaged piles. If waste piles have become mixed, then it is likely that the waste will be removed from site to a suitably permitted facility.

16.4 Making the Site Operational after a Fire

After a significant incident, an assessment will be undertaken by a suitably qualified individual. Technically competent managers and/or engineers will assess the degree of damage caused by a fire and the residual risk from fire damaged waste, emissions or equipment. Burnt waste material will be kept on site for a short period of time if required for a subsequent internal

investigation. Following this, any burnt material will be transferred off site to a suitably permitted disposal facility.

17.0 CONCLUSION

This FPP is considered to be a 'working' document that is reviewed and updated annually or as required should any of the following occur:

- A fire on site;
- A change or review of legislation; or
- If the site is instructed to do so by the EA.

It is the responsibility of the Site Manager or nominated person to maintain this FPP and to ensure it is adhered to in the event of a fire on site.