

FIRE PREVENTION PLAN

C O'Donovan & Sons Ltd

30 Pheasant Drive

Birstall

Batley

West Yorkshire

WF17 9LT

Version 1.0 October 2025



SJW Enviro Consulting Ltd

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Appendices:

Appendix A – Drawings

Drawing No. – COD/PD/FPP/01	Site layout plan
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1.0 Purpose

The purpose of this document is to identify potential fire hazards, detail the controls implemented to prevent fires and the actions taken to reduce the impacts should there be a fire on site.

This plan has been prepared in conjunction with the format prescribed by the Environment Agency and detailed in the Environment Agency Guidance Document – *Fire Prevention plans: environmental permits* published 29 July 2016 and last updated 11 January 2021.

2.0 Scope and Objectives

This Fire Prevention Plan is applicable for C O'Donovan & Sons Ltd, 30 Pheasant Drive, Birstall, Batley, West Yorkshire, WF17 9LT.

The fire prevention measures in this plan have been designed to meet the following objectives:

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

3.0 Management responsibilities

3.1 Site management

- Ensure the effective implementation of the Fire Prevention Plan;
- Allocate sufficient resources to ensure that the Fire Prevention Plan can be implemented;
- Monitor the overall effectiveness of the Fire Prevention Plan through regular site inspection and site operative liaisons;
- Regularly update the Fire Prevention Plan as required and carry out an annual review.

3.2 Site operatives

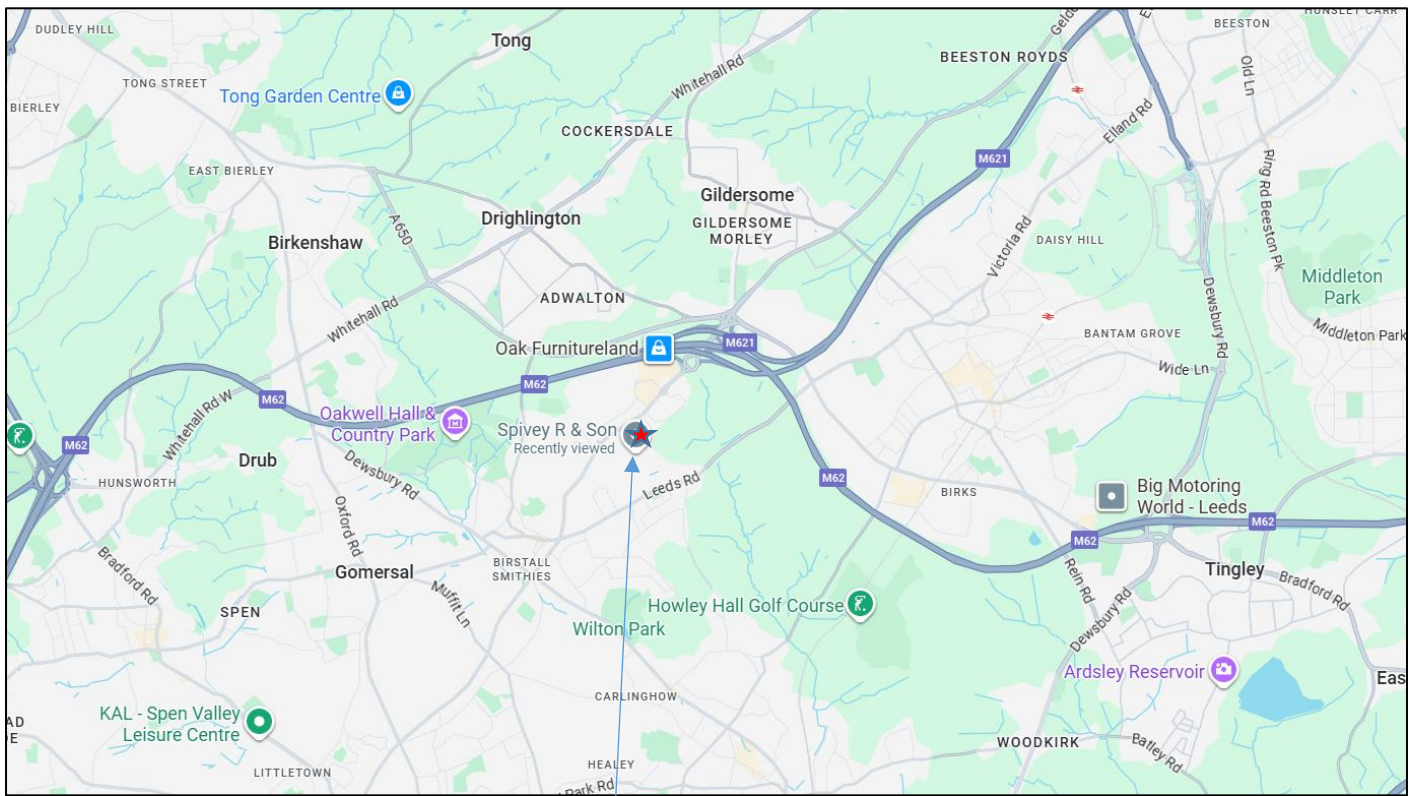
- Follow operating instructions and report discrepancies between these instructions and the work;
- Maintain the fire prevention controls implemented by C O'Donovan & Sons Ltd (as detailed in this plan);
- Report any activities or events that could jeopardise the fire safety strategy.

4.0 The Site

4.1 The Site Location

The site is located off Pheasant Drive, Birstall approximately 1.1 kilometres to the east northeast of Birstall village centre and 8.9 kilometres to the southwest of Leeds city centre. The site entrance is directly off Pheasant Drive, served at OS map reference SE 23373 26991. The immediate surrounding areas are comprised almost entirely of other industrial units with a small area of scrubland across Pheasant Drive to the north. The location of the site is shown by the red star on the map below

Figure 1: Location of the site



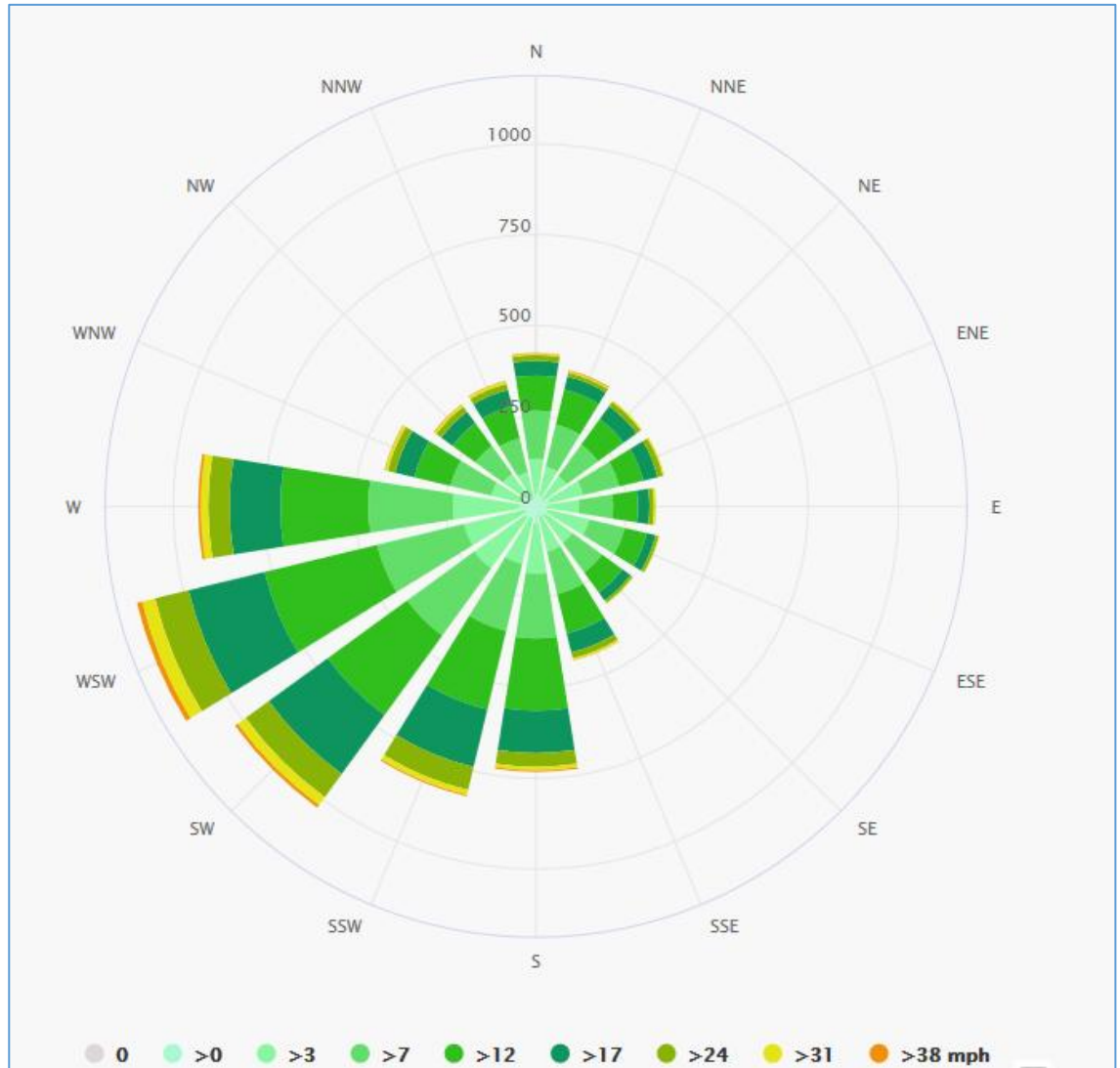
C O'Donovan & Sons Ltd, 30 Pheasant Drive, Birstall, Batley, West Yorkshire

4.2 Local receptors

Within 1 km of the site the following key receptors are located:

- Residential property located approximately 275 metres to the south of the site and extending to the one kilometre radius;
- Residential property located approximately 275 metres to the west of the site and extending to the one kilometre radius;
- Howley Beck running approximately 770 metres to the southeast of the site;
- A small unnamed stream running approximately 440 metres to the east of the site;
- The M62 motorway running approximately 820 metres to the north of the site;
- The M621 motorway running approximately 880 metres to the north of the site;
- A number of A roads including the A62 Gelderd Road running 260 metres to the north, northwest and west of the site and the A643 Leeds Road running 400 metres to the south of the site;
- Batley Girls High School located approximately 700 metres to the south of the site;
- Windmill Junior and Primary Schools located approximately 840 metres to the south of the site;
- The Showcase Cinema complex located approximately 690 metres to the northeast of the site;
- Birstall retail park located approximately 600 metres to the north and north northeast of the site;
- The site is surrounded by other industrial units on all sides.

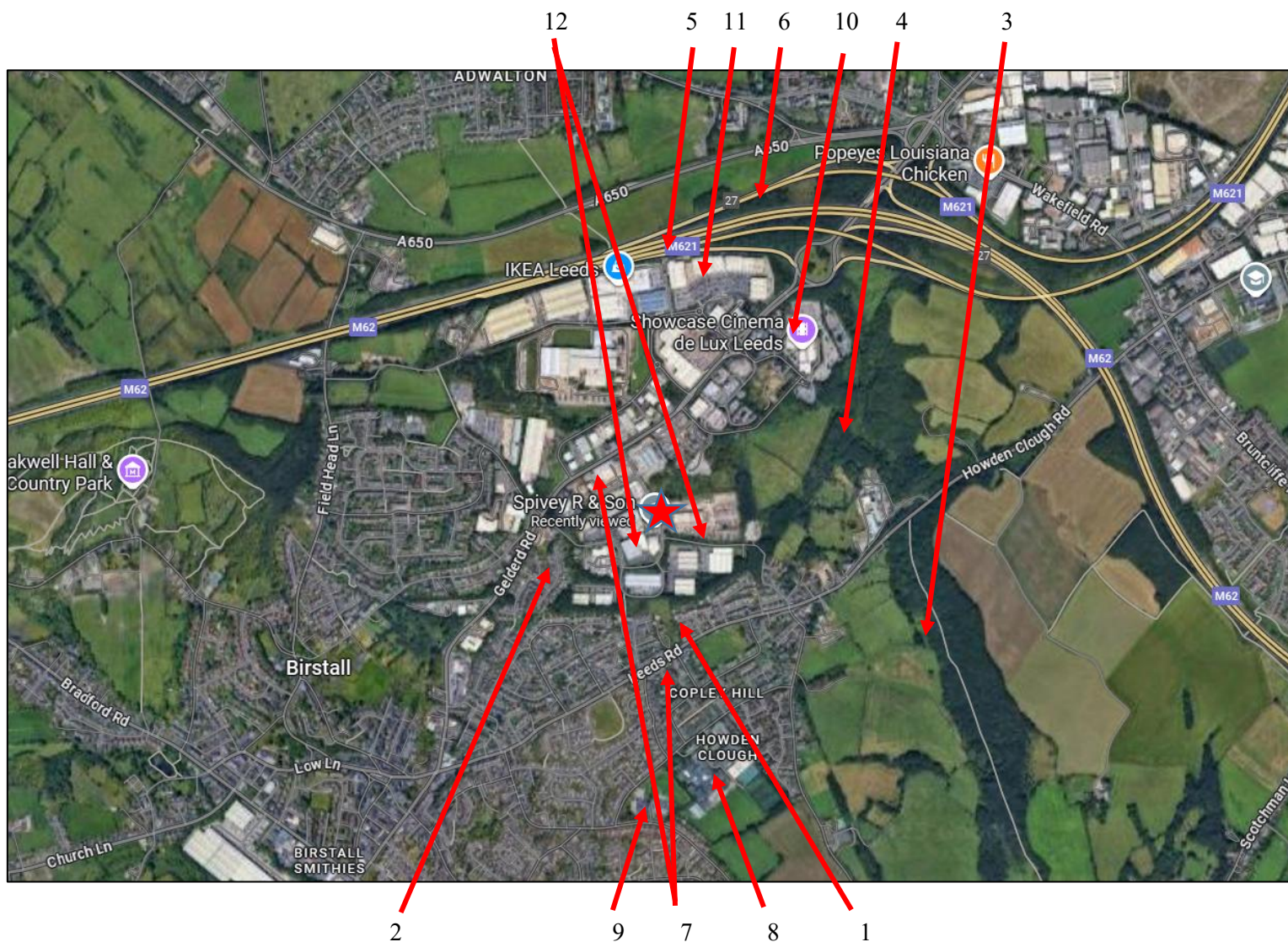
These local receptors would be impacted by a fire on site, however, the prevailing wind direction is south westerly, as shown by the wind rose for Leeds below, thus reducing the likelihood of impact of air emissions on those receptors located to the south and west of the site.



The plan below shows the location of these sensitive receptors in relation to the site, the location of which is indicated by the red star. The numbers on the plan correspond to the following receptors:

1. Residential property located approximately 275 metres to the south of the site and extending to the one kilometre radius;
2. Residential property located approximately 275 metres to the west of the site and extending to the one kilometre radius;
3. Howley Beck running approximately 770 metres to the southeast of the site;
4. A small unnamed stream running approximately 440 metres to the east of the site;
5. The M62 motorway running approximately 820 metres to the north of the site;
6. The M621 motorway running approximately 880 metres to the north of the site;

7. A number of A roads including the A62 Gelderd Road running 260 metres to the north, northwest and west of the site and the A643 Leeds Road running 400 metres to the south of the site;
8. Batley Girls High School located approximately 700 metres to the south of the site;
9. Windmill Junior and Primary Schools located approximately 840 metres to the south of the site;
10. The Showcase Cinema complex located approximately 690 metres to the northeast of the site;
11. Birstall retail park located approximately 600 metres to the north and north northeast of the site;
12. The site is surrounded by other industrial units on all sides.



5.0 Site activities

5.1 Permitted activities

This Fire Prevention Plan accompanies an application to vary the existing environmental permit which allows the washing, reconditioning and scrapping of metal and plastic containers and the storage and bulking up of a wide range of material. This storage and bulking up activity currently does not take place at this site and is therefore not included in this plan. Should this situation change in the future then this fire prevention plan would be updated accordingly.

The applicant already runs similar permitted operations at their facilities on Ingram Road, Holbeck, Leeds and Ashfield Way, Whitehall industrial Estate, Leeds.

5.2 Other non-permitted activities

As well as the permitted activities above the site also stores potentially flammable liquids that could pose a fire risk. The location of the storage areas for these non-permitted substances are shown on the attached plan Ref. COD/PD/FPP/01, site layout plan. These liquids are stored in bunded containers at least six metres away from any other potential fire risk. The containers are well labelled to identify their contents and staff are vigilant when handling these containers. There are no gas cylinder stored on site and the only fuel is that required for the plant and equipment on site.

6.0 Managing common causes of fire

6.1 Arson

The permitted area is surrounded by fencing or walling to a minimum height of two metres and in many areas topped with razor wire or metal spikes. The entrance gates to the rear yard are made up of 2 metre high metal paling fencing topped with spikes. The gates are padlocked closed at all times when the site is not operational.

Site boundary checks are completed weekly to ensure the site security is maintained and the risk of arson reduced.

The site has 24 hour CCTV coverage with cameras covering the yard and building areas. The cameras are monitored from the site office during working hours and can be monitored 24 hours a day by members of staff from mobile phones.

6.2 Plant and equipment

The only mobile plant used on site as part of the daily operations are forklift trucks. Static plant and equipment, for example cleaning and drying machinery, is located entirely within the buildings on site and are marked on the attached drawing COD/PD/FPP/01.

Site maintenance activities are performed in accordance with operating procedures. The operators understands the importance of routine preventative maintenance. In summary, the following provisions are implemented:

- Plant maintenance schedules using the manufacturer's recommendations where vehicles are serviced after 500 hours of operation;
- Pre-use checks are completed prior to using plant and equipment daily;
- Defects are reported and actions taken based on priorities;
- All plant and equipment is visually inspected by the operator at the end of the working day for the purposes of identifying fire risks;
- Throughout the day operators are vigilant in checking vulnerable areas like exhausts and engine bays;
- Specialists contractors are used to perform maintenance outside the scope and expertise of the site management and operatives;
- All plant and equipment undergoes a thorough examination by independent insurers every 6 months as a minimum.
- All documentation relating to plant and equipment maintenance is retained in the site office for inspection.

All forklift trucks have fire extinguishers in them and extinguishers are available on site should a small fire require fighting by site staff. Out of hours the forklift trucks are stored in the rear yard well away from any potentially flammable substances.

6.3 Electrical faults

All electrics on site, are installed by a fully qualified electrician. All portable electric appliances are PAT tested annually and certified by a fully qualified electrician. All installation and testing documentation is retained in the site office for inspection.

6.4 Discarded smoking materials

No smoking is permitted on any part of the site.

6.5 Hot works

No Oxy acetylene cutting currently takes place on site nor is there any other form of hot works cutting. This cannot therefore be a cause, or a contributory factor, to a fire on site.

6.6 Industrial heaters

This site does not use industrial heaters and these therefore cannot be a cause of fire.

6.7 Hot exhausts

While plant and equipment is in use throughout the working day and exhausts and engine bays inevitably heat up regular housekeeping takes place daily and operators continually and vigilantly monitor for potential fire risk situations.

At the end of the day mobile plant is parked away from the waste piles in the rear yard. Checks are made by site management on all items of plant and equipment to ensure that they do not pose any fire risk prior to closing the site for the day.

6.8 Ignition sources

Sources of ignition have been assessed and reduced as far as reasonably practicable. Remaining ignition sources have been identified and controlled as follows:

Smoking is not allowed on any part of the site.

Hot works in the form of cutting of metal are not carried out on site

All portable electrical appliances are PAT tested annually and certified by a fully qualified electrician. Electric lights are insulated.

There is a potential for sparks as plant regularly comes in contact with metal and concrete surfaces. The general housekeeping however makes fires from this source unlikely.

6.9 Batteries in end-of-life vehicles

The site does not accept end of life vehicles, nor is it permitted to do so.

6.10 Leaks and spillages of oils and fuel

Every attempt is made to prevent fuels and combustible liquids leaking or trailing from vehicles on site. Spill kits in the form of absorbent granules are located within the site buildings.

Should a spill occur staff are instructed to use the absorbent granules to cover the liquid and then clear up and place the contaminated material in a container awaiting removal from site to a suitably permitted facility for disposal. Spill kits are located in the site office and the washing shed.

6.11 Build-up of loose combustible waste

The site is visually inspected and cleaned daily to prevent the build-up of fragments that could cause slipping and tripping hazards. This also serves to prevent damage or punctures to vehicles using the site. As part of this process loose combustible waste is collected and stored awaiting removal from site.

The nature of the site is such that very limited amounts of loose combustible material are ever found within the permitted area.

6.12 Reactions between wastes

It is difficult to imagine any reaction between the types of waste accepted at the site, however, every load is inspected both as it arrives on site and when it is unloaded. If an adverse reaction has occurred in transit, then this would become apparent and necessary steps could be taken to deal with the situation. The site has a designated quarantine area where material can be isolated and dealt with accordingly.

6.13 Deposited hot loads

The waste acceptance procedure at the site ensures that every load is checked before it is unloaded and further checks are made when the material is cleared to be off-loaded (see waste acceptance in section 8.1). Under these circumstances, it is highly unlikely that a 'hot load' would be accepted on site.

Should such an eventuality occur and a hot load is deposited on site the material would be immediately moved to the quarantine area where site staff would monitor or deal with the situation as necessary under the guidance of site management.

7.0 Preventing self-combustion

7.1 Managing storage time

On a daily basis all storage piles are visually inspected by the site manager for any anomalies, such as visual signs of heat, steam and vapour. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the material or damping down as deemed necessary.

Due to the nature of the business, site operators are located within the yard and building areas for the majority of the working day, they continually and vigilantly monitor the condition of all the processes for potential fire risk situations.

Storage time for waste materials is kept to a minimum where possible and it is not anticipated that waste will remain on site for more than three weeks before it is processed or removed from site.

7.2 Monitoring and controlling temperatures

There is no active physical monitoring of the temperature of the waste piles, but site staff are continually monitoring the piles for any obvious signs of raised temperatures.

During hot weather, when outside temperatures are expected to exceed 25 degrees centigrade then additional inspections of the stockpiles in the external yard are undertaken. Site management will inspect the stockpiles every 30 minutes to check for anomalies and action will be taken should this be deemed necessary. Stockpiles will be broken down into smaller sizes with separation distances maintained or moved into shaded areas if possible.

Out of hours, CCTV covers the whole site and this can be remotely monitored so signs of a fire on site would be identified quickly, site management would be notified and the emergency services contacted. The CCTV has flame detection capability and an alarm system which would mean that a fire on site would be quickly detected.

7.3 Waste bale storage

No bales are stored on site.

8.0 Managing waste piles

8.1 Waste acceptance

All waste arriving on site, irrespective of the carrier, undergoes an initial inspection of the load by site personnel.

When the material has been accepted, the driver is directed to off load the vehicle in the appropriate area of the site. As the vehicle is unloaded site staff re-assess the material to ensure that there is nothing in the load that does not comply with the site permit. At this stage, they also check to ensure that the load is not hot or present any fire hazard. Non-permitted items are either loaded back onto the vehicle to be taken away or placed in the quarantine area awaiting further assessment.

8.2 Waste pile size

The height of stockpiles of material at the site is kept to a minimum wherever possible and there is a rapid turn-around of material on site. When the waste arriving on site has been sorted it is stored in discrete piles area and there is significant separation between each waste type.

Waste is stored in its largest form and waste pile sizes are kept to a minimum where possible.

The largest waste pile size is the IBC's awaiting washing. At its maximum extent this stockpile will be 12 metres long, 3 metres wide and 3 metres high. A total of 108 cubic metres.

Other maximum waste pile sizes for flammable material:

- Oil – 8 cubic metres (4m x 2m x 1m) in 45 gallon drums
- Fuel – 8 cubic metres (4m x 2m x 1m) in 45 gallon drums
- Plastic waste – 40 cubic metres (5m x 4m x 2m) in sealed bags
- Scrap metal – 20 cubic metres (5m x 4m x 1m) in a skip

8.3 End of life vehicles

The site does not accept, nor is it permitted to accept end-of-life vehicles in any form.

8.4 Waste stored in containers

All ancillary waste materials are stored in containers (either cut up IBC's or 45 gallon drums). There is significant separation between the various waste types. While the building itself is bunded all containers which hold liquid waste are also stored inside their own bunds designed to contain 110% of the volume of the containers.

9.0 Preventing fires spreading

9.1 Separation distances

Significant separation distances are maintained on site between individual piles of material.

There is at least a 6 metre separation between potentially combustible material and any piles of waste or other hazards. Individual waste piles are separated by at least a six metre buffer zone. Material stored in the external yard is kept at least six metres from the area used to park forklift trucks out of hours, the site perimeter and the quarantine area.

9.2 Fire walls and bays

There are no fire walls or bays on this site however the main building is divided into three sections, two of which are used for drum reconditioning purposes and the third for the site offices and welfare facilities. These internal walls will play a significant part in reducing the spread of any fire within the building but these are not specifically designed as fire walls.

10.0 Quarantine area

The quarantine area for this site is in the yard area to the northwest corner. There is sufficient space to store all of the combustible waste material on site in this area while still allowing access to all areas of the yard for site staff and the emergency services.

There is a separation of at least six metres between the quarantine area and the site perimeter as well as any other individual waste piles.

The quarantine area is approximately 56.25 square meters. As the largest waste pile has a base of 36 square metres the quarantine area is more than adequate to hold 50% of this largest pile.

There is a minimum 6 metre separation between the edge of the quarantine area and other waste piles as well as the site perimeter.

11.0 Detecting and suppressing fires

11.1 Detecting fires

The site has 24 hour CCTV coverage with cameras monitoring both the inside of the buildings and the yard areas. Out of hours the cameras can be remotely monitored using mobile phones. All waste piles within the yard and buildings are covered by these cameras and a fire would be quickly detected.

All the CCTV cameras on site are fitted with fire detection systems which can detect smoke and naked flame up to 100 metres away within 4 to 20 seconds of a fire occurring. Should a fire be detected at any time an alarm is sounded on the mobile phone of the directors, site manager and technically competent manager. Outside operational hours the site has a duty officer rota and the duty officer would contact the emergency services immediately an alarm sounds. They would then attend the site to afford access and assist if required. The duty officer would be on site within 10 minutes of an alarm sounding.

During operational hours the site has a staffing level such that any fires would be quickly detected and remedial action could be taken if necessary. Staff are trained to continually be alert to potential sources of fire and to proactively deal with any problems that might arise. At the end of the working day the site manager or technically competent manager will undertake a fire watch around the whole site prior to locking up and leaving for the day. They will also ensure that the forklift trucks are parked in their overnight position in the rear yard. There are a minimum of six staff on site during operational hours.

Any fire on site would be considered an emergency and the fire service would be contacted as a matter of course.

11.2 Suppressing fires

The designated duty officer, when appraised of a fire on site shall ensure:

- The emergency services are notified of the incident;
- Site senior management and technically competent managers are notified of the incident and requested to attend site if out of hours;

Fire extinguishers are available within the buildings in the unlikely event that a fire occurs. Small fires can also be dealt with using the sites own mains water.

The nearest fire station operated by West Yorkshire Fire and Rescue Service is located at Corporation Street, Morley which is 4 kilometres from the site. The emergency services could be on site in less than 10 minutes following the raising of the alarm.

12.0 Dealing with a fire on site and the aftermath

12.1 Firefighting techniques

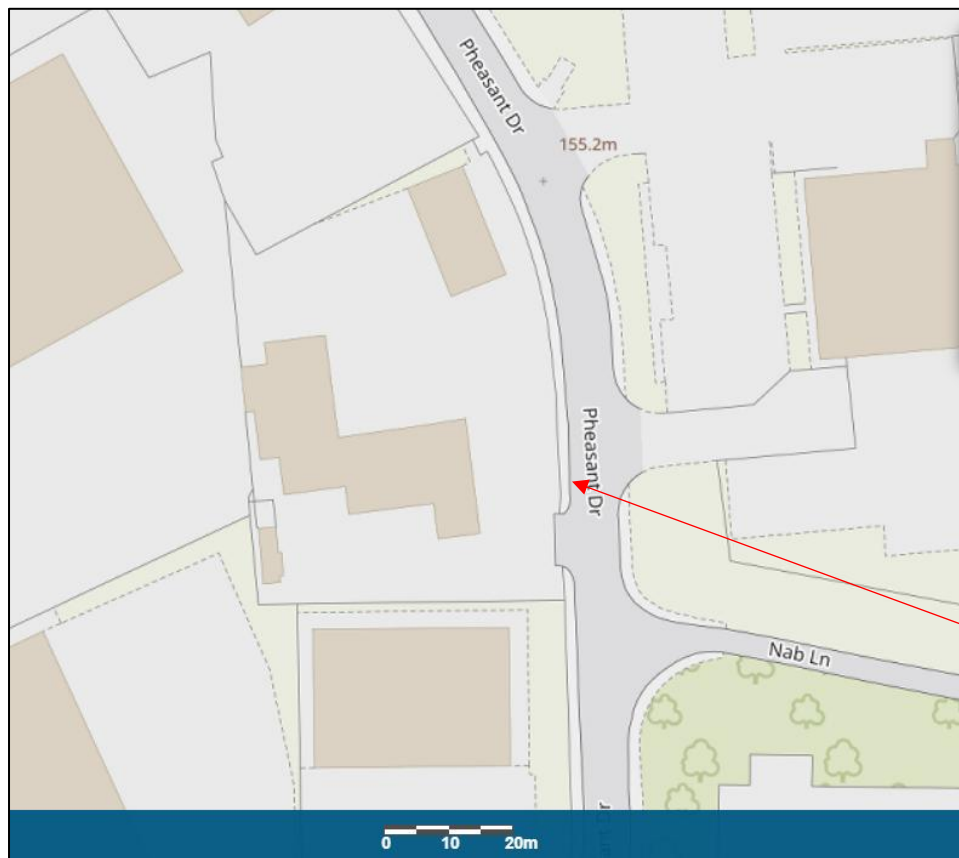
In the event of a fire the most senior member of staff on site would act as incident controller to deal with the situation.

To prevent an incident escalating and to reduce the spread of fire, there is a possibility to move unburnt material with the machines to an alternative area of the site, preferably the quarantine area. The initiation of this action would be taken by the incident controller and would always consider the safety of the employees. The assessment as to the feasibility of moving unburnt material would consider

- The safety of the operator inside the machine;
- The direction of the smoke;
- The heat of the fire;
- The means of escape for the operator;
- The likelihood of the machine catching fire due to radiated heat.

In the case of a small fire there is the option of using one of many fire extinguishers placed around the site to attempt to bring it under control. Again, the factors relating to the health and safety of the operatives must be taken into account and at no point should a site operative compromise his health and safety.

12.2 Water supplies



There is a fire hydrant located within 5 metres of the site entrance on Pheasant Drive as show by the red arrow on the plan above.

West Yorkshire Fire and Rescue Service have confirmed that the hydrant can deliver water at 1800 litres per minute This equates to a total of 324,000 litres over a three hour period which is comfortably enough to extinguish the largest waste pile on site.

The largest waste pile on site, IBC's awaiting processing, has a maximum volume of 108 cubic metres. Fire prevention guidance states that a water supply of 853.3 litres per minute for 3 hours is sufficient to deal with a waste pile of 108 cubic metres in volume. Therefore, a maximum of 129,600 litres of water would be required to deal with a fire in the largest pile.

12.3 Managing fire water

The whole of this site is flat and surfaced with an impermeable pavement and bunded to a height of 15cm throughout. Bunds are maintained at access points with the use of 'sleeping policemen'. The whole site drains towards a sump which collects liquid and send it to the treatment plant to the rear of the building.

The site covers an area of approximately 3,000 square metres. With a 15cm bund around it the area could retain 450,000 litres of water. This is more than enough capacity to retain all the fire water required to put out a fire in the largest waste pile.

Following a fire on site the water would be pumped from the sump, the site and the building and removed from the site to a suitably permitted facility.

12.4 During and after a fire

In the event of a fire at this site incoming vehicles would be diverted to the operators other sites at Ingram Road, Holbeck, Leeds and Whitehall Industrial Estate, Leeds or other facilities outside the control of the permit holder in the Leeds area and continue until such time as it is deemed acceptable to recommence waste acceptance at the site.

In the event of a fire, site staff will be made available to contact local residents and businesses to make them aware of the situation. Deployment of staff will be at the site management and emergency services discretion. Should evacuation of the surrounding area be necessary then site staff would be in place to assist this process as well as to provide site specific information to the emergency services.

The Environment Agency will be informed of any fire on site within 4 hours of the incident.

Following any incident any fire damaged waste will be removed from site for handling and processing at another site. Any fire damaged property will be repaired or removed from site as necessary. Any clearance of debris from the site, including clearance of access routes will be undertaken before the site is declared fit for operation again. The sump will be emptied, and the contents removed for treatment at a suitably permitted facility. The site will not re-open without the agreement of the Environment Agency and the fire service.

13.0 Staff training

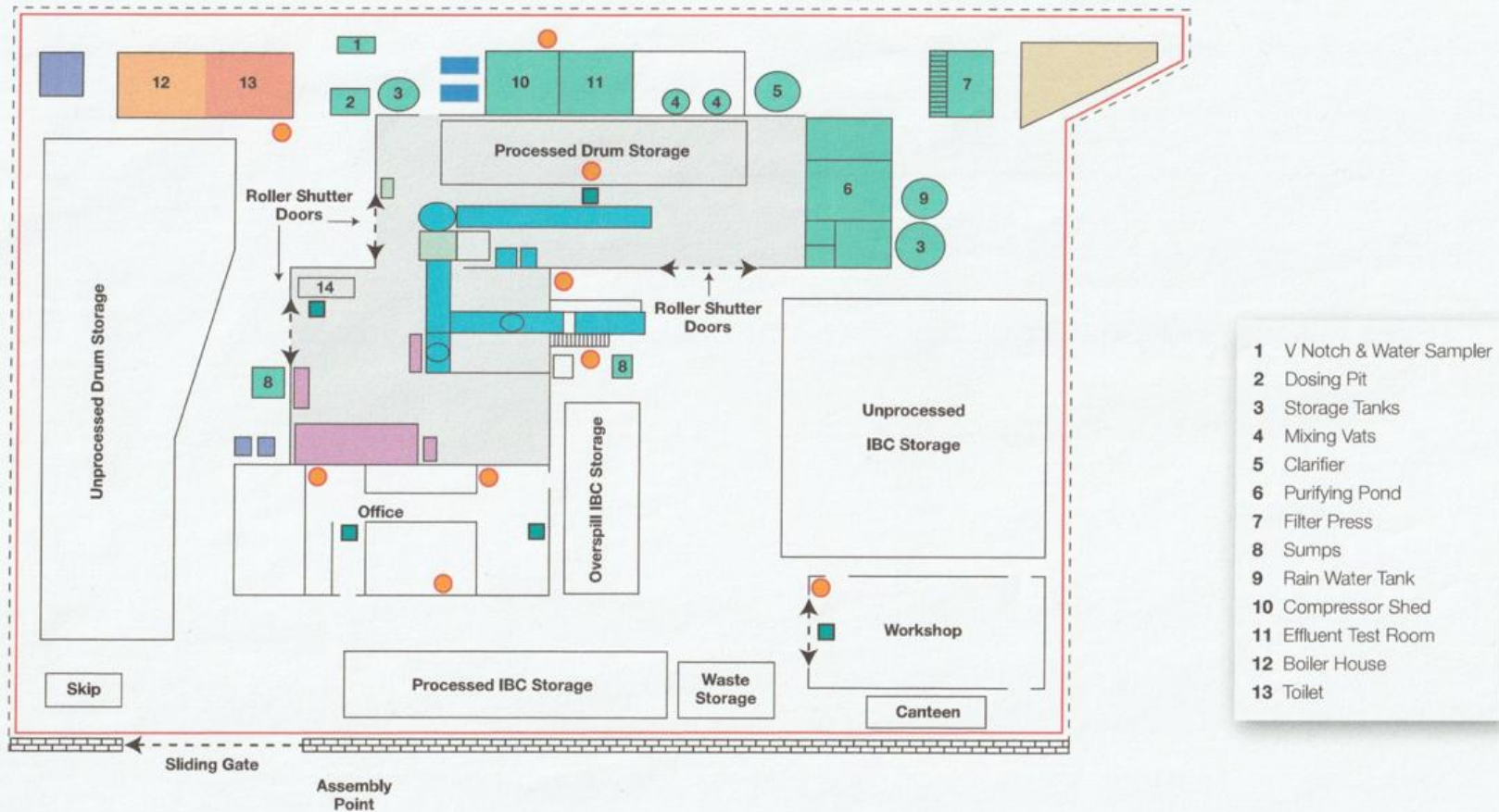
All site staff are trained in the site operating procedures, maintenance procedures, the use of fire-fighting equipment and emergency plans, including this fire prevention plan.

Refresher training and updates are given to site staff as and when required and the effectiveness of the training is tested through six monthly fire drills.

All training is documented, and the records are available for scrutiny on site. Each member of staff has their own training record where specific training sessions are documented.

14.0 Continual Improvement

C O'Donovan & Sons Ltd are dedicated to continually improving site operations through investment and modification in staff and infrastructure. This Fire Prevention Plan is due for review before the end of October each year. The next review is to be carried out prior to 31st October 2026. Any amendments made to this plan will be sent to the Environment Agency for their consideration and incorporation.



KEY

- | | | |
|--|---|---|
| Effluent Treatment | Drum Processing | Fire Call Point |
| Quarantine Area | Leak Tester | Bunded Area |
| Fuel Tanks | Compressors | Palisade Fence |
| IBC Processing | Fire Extinguishers | Brick Wall |