

## Cox, Ralph

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**From:** Cox, Ralph  
**Sent:** 13 March 2017 11:35  
**To:** Cox, Ralph  
**Subject:** Application reference C/5/2015/5007: SPC Atlas Works, Lenwade - Norfolk Fire and Rescue Service Comments

**From:** Herrell, Richard [mailto:Richard.Herrell@fire.norfolk.gov.uk]  
**Sent:** 03 March 2017 16:19  
**To:** Cox, Ralph <ralph.cox@norfolk.gov.uk>  
**Cc:** joseph.warns@fire.norfolk.gov.uk; Collins, Garry <Garry.Collins@fire.norfolk.gov.uk>; rob.brodie@environment-agency.gov.uk; Machin, Lorraine <lorraine.machin@environment-agency.gov.uk>  
**Subject:** Application reference C/5/2015/5007: SPC Atlas Works, Lenwade - Norfolk Fire and Rescue Service Comments

Good Afternoon Mr Cox,  
 Further to our recent meeting(s) both with Wiser representatives / EA and yourself; we provide the following feedback as requested relating to the above proposal.

In providing this information, you will recall that we ( Norfolk Fire and Rescue Service – NF&RS) have advised you that we are not a statutory consultee in this planning matter; therefore our comments are at your request.

Furthermore, we would advise that whilst any eventual use of such a site would most likely come under the auspices of the Regulatory Reform Fire Safety Order for enforcement; the agency with Primacy for such a site ( and in particular the processing of Waste) would be the Environment Agency; therefore the conditions of any 'Environmental Permit' issued by the EA would be integral to ongoing efficient and safe working of such a site.

In providing our feedback to you we have been advised that at this time the site does not have an Environmental Permit as no Operator has been declared; therefore our response should be considered inextricably linked with any of the EA's requirements in the future regarding any Permit conditions they would wish to apply in addition to the EA's acceptance of the applicants Fire Prevention Plan ( FPP). In making our response we would highlight that the FPP is a formalised process administrated and controlled by the EA, on which they may consult with NF&RS as they deem necessary i.e. the FPP process is administrated by the EA and not NF&RS.

Our Advice is based on :

- ? The information provided by the applicant's consultant ( Wiser)
- ? Photographic information from Norfolk County Council – in particular the proposed buildings; and
- ? Our experience of dealing with Waste Fires in the County.

Our Advice seeks to :

- ? Reduce the likelihood and frequency of fire; and
- ? Where fire does occur, to reduce the potential health and environmental impacts.

1. Structure of buildings – we note that the site appears to be constructed in part from Asbestos sheeting. Subject to this being confirmed, NF&RS would commend that the operator considers the impact of any fire on the structure of the building and how this may present operational challenges for fire fighters called to deal with any fire fighting operation.
2. Internal storage and waste Process – we acknowledge that the applicant is unable to confirm at this stage the type of waste process to be employed in specific detail;

consequently we would advocate that the following guidance document be used as current best practise for the overall design rational for the proposal – WISH ( Waste Industry Safety and Health Forum) – Reducing Fire Risk At Waste Management Sites.

3. In adopting the WISH guidance we would ask that following points in particular ( not exhaustive) are considered by the planning authority as essentially we would expect to see these points to be applied by way of Environmental Permit ‘conditions’ set by the Environment Agency in due course :
  - a. A full fire risk assessment that demonstrates how human life and the environment will be protected
  - b. Full detail of how the waste will be received, processed and stored – with specific emphasis on the type and specification of fire suppression systems required at each stage of the waste management process i.e. ground monitors, drencher systems and sprinklers etc ( not exhaustive)
  - c. How accidents and emergencies relating to fire and environmental pollution will be prevented; and managed should such an event occur. i.e. site containment for fire fighting water runoff.
4. The layout, amount and size of any material(s) subject to waste management process – and how these items will be managed i.e. Waste pile size, spacing and where applicable ,any specific hazards may exist ( not exhaustive) Note - WISH guidance – we would highlight that the WISH guidance is currently being revised, therefore the designers should take cognizance of specific fire performance data associated with varying fuel loads and the means by which they be stored and in particular how this would impact on the design of any fire suppression system.
5. Water for Fire Fighting – we would expect to see ‘ on site’ ( emphasis added) water supplies for fire fighting to a standard commensurate with our guidance ( attached) . We would highlight that any fire on the proposed site would require a substantial and robust water supply; at this time the current hydrant provision for the site appears to be on the opposite side of the A1067 therefore any fire fighting operation would require significant road management to enable water supply; and it is foreseeable that NF&RS would need to close the A1067 to ensure the efficiency of any fire fighting water requirements. Consequently we would seek fire hydrants to be provided on site at the specification associated with ‘High risk commercial’ see attachment for flow rate and spacing.
6. We have been advised that RDF may be processed on site; we would commend that a quenching pool be provided to support any fire fighting operations. An improvised approach to dealing with waste using a quenching process has been recently employed at a fire in Norfolk; leading to an efficient method of extinguishing waste base fires in conjunction with heavy plant i.e. JCB / earth movers. This approach enables fire fighting water to be contained and lowering the risk to the surrounding environment.
7. Access for fire fighting appliances – we would request that Access be provided to the equivalent standard as stated within Part B 5 of the Building regulations – and that fire appliance access be provided where supplementary fire fighting systems are required – i.e. drenching systems.

Should you need any further assistance please do not hesitate to contact myself or my colleague Joseph Warns.

Forwarded for your information as requested

Richard Herrell