

Fire prevention plan guidance review

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Consultation Point	Review of the fire prevention plan guidance (View)
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Your details

When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group.

Please select from the following options: Responding on behalf of an organisation or group

Please tell us how you found out about the Fire preventions plan review consultation: From the Environment Agency

Section 2.3. What is our approach?

Q1. Do you agree with our approach for a maximum acceptable duration for sheltering to be 3-4 hours? Don't know

Q2. Do you agree with the presumption that active fire fighting should be the preferred option and that all sites should be operated in a manner that allows for active fire fighting? Don't know

Section 3.1. The requirement to have a plan

Q3. Do you agree that the Fire Prevention Plan must be a standalone document, so that it is very clear what has been approved and also exactly what risk control measures will be followed on site? Don't know

Section 3.2 Sensitive receptors

Q4. Do you agree that these are appropriate sensitive receptors and that those with 1km should be identified in the Fire Prevention Plan? Don't know

Section 3.3. Quarantine

Q5. Do you agree a quarantine area of the size specified in the Fire Prevention Plan guidance is required? Don't know

Q6. If a quarantine area was not a requirement of a Fire Prevention Plan, then do you consider site specific separation distances derived using bespoke heat flux calculations are appropriate? Don't know

Section 3.4. Storage duration and seasonality

Q7. Do you agree with the limit on the storage duration of combustible waste to reduce the risk of self-combustion? Don't know

Section 3.5. Water supply and containment

Q8. Do you agree that a suitable water supply needs to be available for fire fighting? Yes

Please explain your answer.

Yes, we agree the sites need to consider how to assure a suitable water supply. In this consideration we recommend discussion with the local water utility (if the site has a municipal mains connection) to determine any limitations (flow and pressure, infrastructure size etc) that could impact on the solution. Mains water will usually be available but site operators should consider other options, including storage or non-potable water capture, to augment and enhance mains fed systems.

Q9. Do you believe that wherever possible fire fighting water should also be prevented from entering surface or groundwater? Yes

If not, please explain your answer and provide evidence to support your view.

Attention is drawn to the following cross industry protocol: "*Protocol for the disposal of contaminated water and associated wastes at incidents*" <http://www.water.org.uk/publications/water-industry-guidance/disposal-contaminated-water-october-2012>

We make reference to the 2012 document jointly issued by the Environment Agency, Northern Ireland Environment Agency, Water UK and Chief Fire Officers Association. That provides a protocol to provide guidance for dealing with contaminated water and associated solid wastes arising from washwaters, firewater run-off, spillages and contaminated potable water, which could cause harm to human health, pollute the environment and/or damage the sewage treatment process. The protocol forms the basis of guidance to the emergency services and Local Authorities in developing their own plans and procedures.

The document is currently under review and is due to be reissued in early 2016.

Section 3.6. Preventing self-combustion

Q10. Do you agree that these measures should be required? Don't know

Section 4.1. Site plan(s)

Q11. Do you agree with the proposed content of a site plan? Don't know

Q12. Do you agree with the maximum prescribed pile sizes? Don't know

Section 4.3. Separation distances

Q13. Do you agree with the measures proposed for waste separation? Don't know

Section 4.4. The use of fire walls

Q14. Do you agree that a suitably designed and constructed fire wall can provide adequate separation between piles while enabling fires to be actively fought within 3-4 hours? Don't know

Section 4.4. The use of fire walls

Q15a. Do you think that we should specify minimum standards for fire walls in the fire prevention plan guidance? Don't know

Q15b

Q15b. If you do not think that we should include specific minimum standards for fire walls, do you think that the design should be left to an appropriately qualified person from the 'Red Book' and the Loss Prevention Certification Board? No

Section 4.5. Storage in a building

Q16. Do you agree that storage within a building presents additional challenges and that we must require all buildings to have an appropriately designed and installed detection/suppression system? Don't know

Section 4.6. General actions to minimise fire risk

Q18. Do you agree with all these risks and measures? Don't know

Section 4.7. Clarifying what are acceptable deviations from the minimum standards

Q19. Do you agree with the approach indicated above about the acceptable areas for deviation from the minimum standards? Don't know

General question

Q20. Please tell us if you have any other views or comments on the guidance that have not been covered by previous questions.

Broader concerns in relation to the wider consultation:

In addition to the answers to the questions above, which reflect issues of concern across our membership, Anglian Water have raised with us a number of serious concerns about the guidance, reflecting the potential impact on their operational activities, to which we would draw your attention.

These issues include the significant funding implications of the guidance, which could be so serious as to make the operation of waste compost sites financially unviable. An assessment of the costs of the guidance should be completed to inform any decision about its introduction.

We would also draw your attention to Anglian Water's concerns about the implications of the guidance in instructing water companies to train their staff to fight fires, which runs counter to existing advice.

Beyond this, we would also want to draw your attention to the points they raise in relation to:

- 1 The consultation process
- 2 The treatment of waste and non-waste material
- 3 The existing management of fire risk
- 4 The potential for setting guidance in areas where it duplicates what already exists and has been provided by other authorities.