

PART B

EAF, Port Talbot (Scrap Handling Facility)

Planning Application - Fire Strategy Compliance Statement

Document Control

Project Name	EAF, Port Talbot (Scrap Handling Facility)
Document Title	Compliance Statement
Site Address	Port Talbot, SA13 2NG
Client Name	Turley
Document Reference	EAF-PTB-XX-ZZ-CS-FE-3001
Internal Reference	801892
Revision	02 – Final Version
Date	23/07/2026

Rev.	Date	Document Type or Description of Change	Author Name & Qualifications	Reviewed Name & Qualifications	Authorised Name & Qualifications
00	07/07/2026	00-Draft	Max Mejzner Beng (Hons)	Poppy Bluck BSc (Hons)	Andrew Gordon BEng, MSc, MIFireE
01	21/07/2026	01-Draft	Max Mejzner Beng (Hons)	Poppy Bluck BSc (Hons)	Andrew Gordon BEng, MSc, MIFireE
02	23/07/2026	02-Final Version	Max Mejzner Beng (Hons)	Poppy Bluck BSc (Hons)	Andrew Gordon BEng, MSc, MIFireE

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1 Introduction

The EAF is a proposed electric arc furnace situated at the Tata Steel site at Port Talbot, the area referenced within this report is the scrap handling facility shown in Figure 1 below. This area contains scrap storage areas, container storage, a railway line, workshop, office, existing storage buildings and car park.

EAF is an approved development that benefits from Hybrid Planning Permission 2024/0711. This development is for the detailed design of the infrastructure associated with the outline element of the approved development.

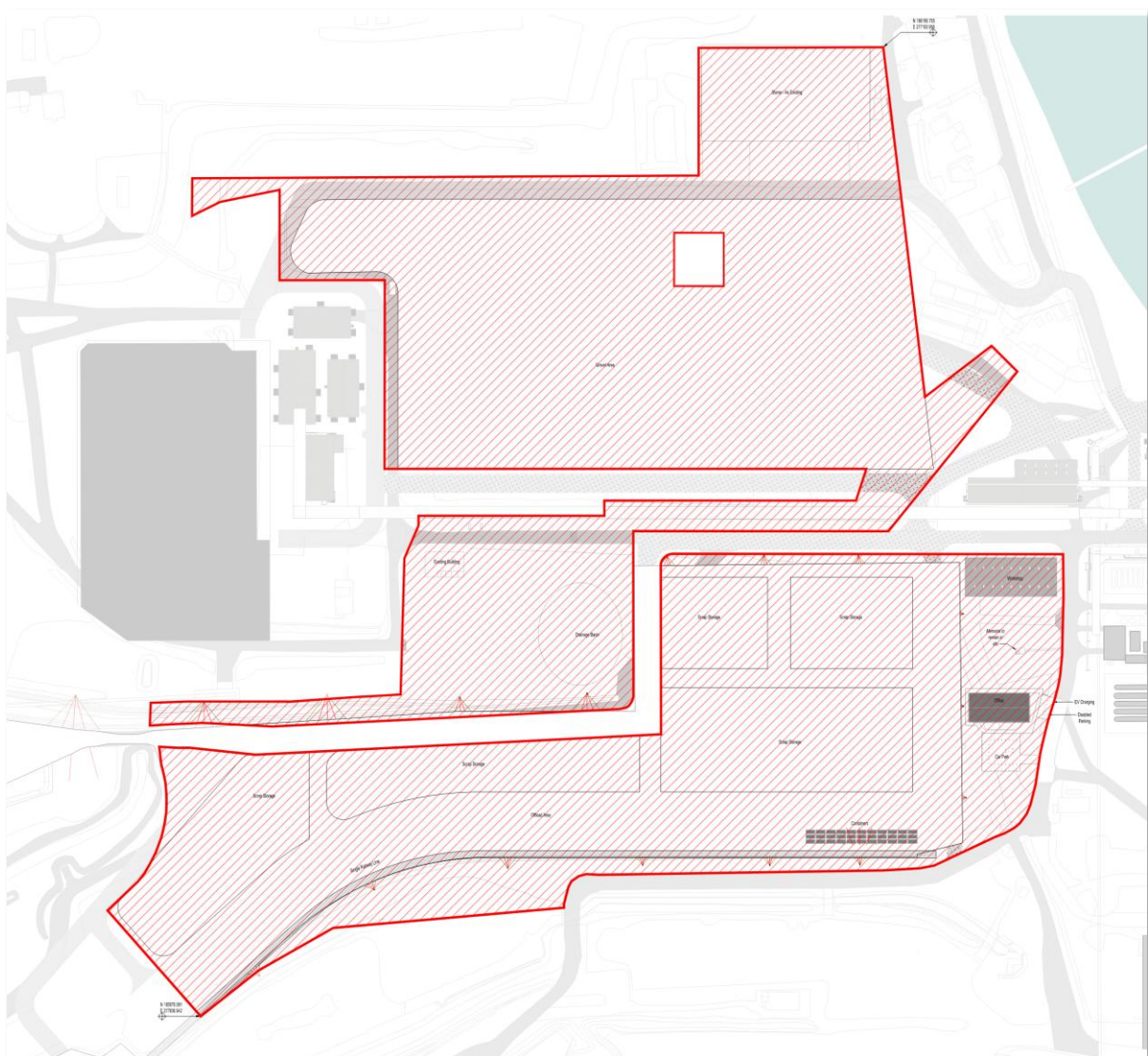


Figure 1: Scrap Layout Plan (Source: Lawray Architects)

PartB Group Ltd. has been appointed to provide a compliance statement for the proposed development forming the subject of the reserved matters application.

This statement consists of the following areas:

- NRW – Fire Prevention and Mitigation Plans
- B1 - Means of Warning & Escape
- B2 - Internal Fire Spread (Linings)
- B3 - Internal Fire Spread (Structure)
- B4 - External Fire Spread
- B5 - Access & Facilities for the Fire Service

1.1 Executive Summary

This Compliance Statement reviews the proposed scrapyard area development at Port Talbot, including the scrapyard, workshop and office/amenity building, against Approved Document B (Wales) and Natural Resources Wales¹ (NRW) Fire Prevention and Mitigation Plan (FPMP) guidance.

The assessment concludes that the office and workshop buildings are capable of achieving compliance with Part B of the Building Regulations in principle; however, several fire safety matters require further development. The primary concern relates to the fire hydrant provision for the workshop, which requires further review. Hydrant locations have been shown in the required positions within the Appendix - Fire Strategy Mark-Up to demonstrate compliance.

For the wider scrapyard site, it has been confirmed that the metal scrap yard will contain only ferrous metal. The ferrous metal scrap is generally considered to present a low fire load and therefore does not fall within the prescriptive NRW guidance. The scrapyard has therefore been designed and reviewed based off the Natural Resources Wales guidance but as a low-risk facility.

1.1.1 Hold Points

Table 1: Hold Points

Hold Point	Report Section	Status	Date
Confirmation of workshop fire hazard classification and associated means of escape requirements. <i>Workshop will be classed as a normal hazard facility.</i>	2.4	Closed	20/07/26
Confirmation of scrap composition and whether combustible or reactive materials will be accepted on site. <i>Scrap will be furnace ready and processed before being stored on site.</i>	1.6	Closed	03/07/26

¹ Natural Resources Wales. *Fire Prevention and Mitigation Plans*. Available at: [Natural Resources Wales](#) (Accessed: 6 July 2026).

Hold Point	Report Section	Status	Date
Verification of firefighting water supplies and hydrant locations for both the buildings and scrapyard.	6.2	Open	
Material/equipment stored within containers. <i>Material stored within containers will create no further fire risk.</i>	4.3	Closed	20/07/26

Subject to resolution of these matters during environmental permitting, the proposed development is considered capable of meeting the relevant fire safety and fire prevention objectives for both the buildings and the scrapyard operation.

1.2 Limitations of Statement

The compliance statement is based on the following information provided. Under no circumstances is liability accepted by PartB for the accuracy of such information.

Table 2: Information Provided

Description	Number	Revision	Produced by	Date
Proposed Site Plan – Indicative Outline Plan – Phase 1	EAF-LAW-X-X-DR-A-900010A	P06	Lawray Architects	15/10/2024
Area 25 – Office Floorplans	EAF-LAW-25-X-DR-A-060102	P01	Lawray Architects	23/06/2026
Area 25 Proposed GA	EAF-LAW-25-X-DR-A-060001	P02	Lawray Architects	23/06/2026
Area 25 Proposed GA - Workshop	EAF-LAW-25-X-DR-A-060003	P01	Lawray Architects	23/06/2026
Scrap Layout Plan	EAF-LAW-X-X-DR-A-900005	P05	Lawray Architects	23/06/2026
Area 25 Proposed GA - Office	EAF-LAW-25-X-DR-A-060002	P01	Lawray Architects	23/06/2026
Area 25 Proposed GA – Car Park	EAF-LAW-25-X-DR-A-060004	P01	Lawray Architects	23/06/2026

1.3 Design Approach - Natural Resources Wales

This statement has based the design of the scrapyard on guidance provided by Natural Resource Wales (NRW) – Waste Permitting, Fire prevention and mitigation plans. NRW's *Fire Prevention*

and Mitigation Plan guidance should be followed where required by an environmental permit, with specific requirements depending on the type and quantity of combustible waste stored and the nature of the operation.

1.4 Design Approach - ADB Volume 2

This statement has based the design of the buildings upon Approved Document B (ADB) Wales Volume 2: Buildings other than dwellings, 2019 edition, including 2025 amendments.

This statement is based in accordance with ADB Volume 2. It does not include for compliance with any other criteria (i.e. additional client requirements, insurance, etc.) unless specifically described in this report.

1.4.1 Purpose Group

In ADB, buildings are classified into purpose groups to determine appropriate fire safety measures based on their use. The workshop and office building are classified as follows:

- The scrapyards are classified under purpose group 7: Storage and other non-residential
- The amenity buildings are classified under purpose group 3: Office and group 5: Industrial

1.5 Document Review/References

Table 3: Document Review

Document	Publication	Owner	Description
Fire Prevention Plans and Mitigation Plans	2026	Natural Resources Wales	Primary guidance for operators of waste facilities storing combustible materials. Sets out requirements for fire prevention plans, including stockpile management, separation distances, firefighting water supplies, firewater containment and emergency response arrangements.
Appropriate Measures for Permitted Facilities – Treating Metal Waste in Shredders	2023	Environment Agency	Sector-specific environmental guidance for metal shredding and recycling facilities. Covers fire hazards associated with ELVs, WEEE, lithium-ion batteries, ignition sources, waste storage, firewater management and operational controls.
Scrap and Metal Recycling – Health and Safety Guidance	2026	Health and Safety Executive (HSE)	Guidance on health and safety risks at scrap and metal recycling facilities, including fire and explosion hazards, batteries, gas cylinders, plant safety, workplace transport and safe systems of work.

Document	Publication	Owner	Description
Sector-Specific Fire Prevention Plan Guidance for Metals Recycling Facilities	2023	British Metals Recycling Association (BMRA)	Industry best practice guidance to support the preparation of fire prevention plans for metal recycling facilities. Includes recommendations for ELVs, WEEE, battery storage, stockpile management and emergency planning.
Regulatory Reform (Fire Safety) Order 2005	2005 (as amended)	UK Government	Primary fire safety legislation for non-domestic premises. Places duties on 'responsible persons' to undertake fire risk assessments, implement suitable fire precautions and maintain fire safety measures.
WISH WASTE 03 - Orphaned Compressed Gas Cylinders in the Waste and Recycling Industries	2015	Waste Industry Safety and Health Forum (WISH)	Provides guidance on the safe identification, handling, storage, retrieval and management of orphaned compressed gas cylinders found in waste and recycling streams. It covers risk assessment, storage, handling procedures, staff training, reporting and emergency arrangements
WISH WASTE 28 - Reducing Fire Risk at Waste Management Sites	March 2020	WISH	Provides comprehensive guidance for preventing and managing fires at waste management sites, covering fire risk assessment, site layout, waste reception, processing, storage, fire detection and suppression systems, emergency planning, housekeeping, and operational controls for combustible waste.

1.6 Planning and Scrap Metal Fire Prevention Context

Following confirmation that the scrap accepted at the site will comprise ferrous metal only, the facility is considered to present a low fire risk due to the non-combustible nature of the material. As a result, the more prescriptive requirements of the Natural Resources Wales (NRW) Fire Prevention and Mitigation Plan (FPMP) Guidance, which are principally intended for facilities storing, processing or handling combustible waste, are not considered directly applicable to the proposed development.

The NRW FPMP Guidance provides the primary regulatory framework for managing fire risks at waste management facilities where combustible materials are present. It sets out the minimum standards expected to prevent the occurrence of fire, limit fire spread, and minimise impacts on human health, the environment and emergency responders in the event of an incident.

As the proposed facility will only accept clean ferrous metal scrap, combustible materials are not expected to be present within the waste stream, and the associated fire load is therefore

considered to be low. Consequently, measures such as prescribed stockpile separation distances, stockpile size limitations and other fire prevention controls contained within the FPMP are not anticipated to be required.

Nevertheless, the principles of the NRW FPMP Guidance remain relevant as good practice and consideration should be given to the applicable FPMP requirements. This would include appropriate controls relating to stockpile management, fire service access, firewater containment, drainage isolation, pollution prevention and emergency response procedures to ensure that fire risks remain appropriately managed throughout the operational life of the facility.

1.7 NRW Requirements

The principal planning and fire safety requirements are summarised in the table below and illustrated on the accompanying mark-ups.

Table 4: Requirements (Source: Natural Resources Wales)

Requirement	NRW Requirement	Section
Maximum Stack Height	7 metres. Height is measured from the lowest point at the base of the stack to the highest point, accounting for uneven ground. The proposed stockpiles under the T9 exemption will exceed the NRW prescriptive guidance, with the acceptability of these stockpiles to be demonstrated through a site-specific risk assessment submitted as part of the environmental permit application and Building Regulations application.	-
Maximum Stack Width	50 metres where firefighting access is available from both sides of the stack. If access is only available from one side, the maximum width should be 10 metres. The proposed stockpiles under the T9 exemption will exceed the NRW prescriptive guidance, with the acceptability of these stockpiles to be demonstrated through a site-specific risk assessment submitted as part of the environmental permit application and Building Regulations application.	-
Stack Length	No prescribed maximum length. The length is governed by the required fire separation distance and site layout. Longer stacks require proportionally greater separation distances because the radiant heat exposure increases with the fire frontage.	-
Separation Distances	Separation distances will be determined according to stack dimensions using NRW's separation distance methodology. Distances must be sufficient to prevent fire spread, provide safe firefighting access and protect buildings, boundaries and sensitive receptors.	0
Emergency Access	The layout will allow unrestricted access for Fire and Rescue Service appliances around the site and to all waste stacks.	6.1.1
Clear Perimeter	A clear zone will be maintained around the site perimeter, with its width dependent upon the calculated separation distances and stack layout.	5.2
Water Supply	Adequate firefighting water supplies (or alternative approved firefighting methods) will be available at all times.	6.2
Thermal Monitoring	Temperature monitoring equipment will be capable of reaching the full depth of the stack. For a 7 m stack, monitoring equipment must be capable of measuring temperatures throughout the entire stack.	-

2 B1 - Mean of Warning & Escape

This section deals with the following Functional Requirement from Part B1 of Schedule 1 of the Building Regulations 2010 with amendments from 2019.

Functional Requirement

B1. Means of Warning and Escape

The building shall be designed and constructed so that there are appropriate provisions for the early warning of fire, and appropriate means of escape in case of fire from the building to a place of safety outside the building capable of being safely and effectively used at all material times.

2.1 Means of Warning

2.1.1 Fire Detection & Alarm System

The office and workshops are classified under a common place of work and should therefore be provided with a minimum Category M system fire detection and alarm system designed and installed to BS 5839-1:2025.

However, PartB recommends that the system is reviewed after the internal layout of the workshop is confirmed as the large storeroom may require an enhanced system with automatic detectors. This is because situations may evolve in which a fire could readily spread from an unoccupied area and prejudice means of escape from occupied areas.

2.2 Mean of Escape

2.2.1 Travel Distance

Travel distances should meet guidance in Table 2 of ADB, as follows:

Table 5: Maximum Permitted Travel Distances

Area	Maximum Permitted Travel Distance (metres)	
	One Direction (metres)	More than One Direction (metres)
Office	25	45
Industrial (Workshop)	25 (Normal Hazard) 12 (High Hazard)	45 (Normal Hazard) 25 (High Hazard)

Note: The dimensions in the table are travel distances. If the internal layout of partitions, fittings, etc. is not known when plans are deposited, direct distances may be used for assessment. The direct distance is taken as 2/3^d of the travel distance.

Travel distances queries within both buildings have been highlighted in the Appendix - Fire Strategy . The workshop is considered to present a Normal Hazard based on the nature and quantity of the materials, processes, and activities undertaken within the space. Accordingly, the applicable travel distance limits for a Normal Hazard have been applied, and the proposed means of escape are considered compliant.

2.2.2 Number of Escape Routes

The minimum number of escape routes should be in accordance with the following recommendations from Table 3 in ADB:

Table 6: Number of Exits

Maximum Expected Occupancy	Minimum Number of Routes/Exits
Up To 60	1
61-600	2
More Than 600	3

Note: The above numbers are considering occupancy numbers only and not where additional exits may be required due to travel distances.

The number of escape routes has been reviewed, and it is considered to satisfy the expected occupancy numbers.

2.2.3 Minimum Required Clear Exit Widths

The widths of escape routes and exits should comply with the following recommendations from Table 4 in ADB:

Table 7: Exit Widths

Maximum Expected Occupancy	Minimum Exit Width (mm) [1]
60	750
110	850
220	1050
More than 220	50mm for each additional 10 persons

[1] In order to follow guidance from approved document M, the widths in the table may need to be increased to 850mm

All escape exits in the office and workshop building achieve a clear width of 850mm or more. Therefore, the exit widths meet the guidance. Also, it is worth noting that the exit widths need to comply with Part K² and M³ of the building regulations.

2.2.4 Fire Doors

The fire doors and their system should meet the appropriate fire resistance rating as shown above in accordance with BS EN 1634-1⁴.

Magnetic hold-open devices should be utilised by doors in common areas where such doors are expected to be rendered ineffective by occupants (e.g. chocked open or the high frequency of door opening and closing would wear out the smoke seals). The hold-open devices should be linked to the fire alarm system / local automatic smoke detection, so the doors are released to the closed position on the activation of the fire alarm/detection.

The equipment used to control the release of the doors should meet the requirements of Category B actuation in accordance with BS 7273-4:2015+A1:2021⁵.

2.3 Office

2.3.1 Occupancy

Table 8: Table C1 Floor Space Factors (ADB Wales: Volume 2)

Type of Accommodation	Floor Space Factors m ² /person
Office	6

The office floor space was measured off plans provided by Lawray Architects and each floor plate is measured to approximately 600m².

This gives an occupancy of:

$$\frac{600m^2}{6m^2} = 100 \text{ persons per floor}$$

Therefore, the total allowable occupancy based on floor space factors for the office building is approximately 200 persons.

² Protection from falling, collision and impact (Approved Document K). Owner: Ministry of Housing, Communities and Local Government (UK Government). Date produced: 3 January 2013.

³ Access to and use of buildings (Approved Document M), published by the Ministry of Housing, Communities and Local Government on 1 March 2015.

⁴ Fire resistance performance determined in accordance with BS EN 1634-1:2014+A1:2018 (European Standard for fire resistance testing of door and shutter assemblies, developed by CEN and adopted by BSI).

⁵ Door release mechanisms and associated control systems designed in accordance with BS 7273-4:2015+A1:2021 (Code of practice published by the British Standards Institution for actuation of release mechanisms for doors)

2.3.2 Required Exit Widths

In the case of an exit being compromised by a fire, there must be an alternative exit 850mm or more in width provided. For the ground floor, there would be three exits that achieve this after discounting one exit. For the first floor, the exit width is unknown, but it needs to be at least 850mm for expected occupancy on both doors entering the stairwell.

2.3.3 Vertical Means of Escape

The width of escape stair should:

- Be not less than the width(s) required for any exit(s) affording access to them
- Conform with the minimum widths give in table 6 or ADB, which states a minimum stair width of 1000mm
- Not reduce in width at any point on the way to a final exit

The stairs are required to be enclosed in 30 minutes' fire-resisting construction as they are classed as protected stairways within Table A1 of ADB.

2.3.4 Disabled Access/Refuge Provision

Refuges shall be provided in accordance with Approved Document B (Volume 2, Wales) to support the evacuation of disabled occupants. A refuge shall be located on every storey served by a protected stairway (excluding plant-only storeys), with at least one refuge provided per stair. Refuges shall enable direct access to a protected stair, although they need not be located within the stair enclosure itself.

Each refuge shall be formed within a protected space (such as a protected stair, lobby, corridor, or compartment) or an external area sufficiently remote from fire risk and provided with its own means of escape.

Refuges shall accommodate a wheelchair space of not less than 900mm x 1400mm and shall be arranged so that they do not reduce the effective width of escape routes or obstruct the flow of occupants evacuating. Where located within a stair, access to the refuge shall not impede egress.

Refuges are intended for temporary waiting only and shall be incorporated into the building's management and evacuation strategy, recognising that multiple occupants may use a refuge sequentially rather than simultaneously.

2.4 Workshop

2.4.1 Occupancy

Table 9: Table C1 Floor Space Factors (ADB Wales: Volume 2)

Type of Accommodation	Floor Space Factors m ² /person
Workshop	5

The office floor space was measured off plans provided by Lawray Architects plans and each floor came to approximately 1250m². This gives an occupancy of:

$$\frac{1250m^2}{5m^2} = 250 \text{ persons}$$

Therefore, the total allowable occupancy based on floor space factors for the workshop building is approximately 250 persons.

2.4.2 Required Exit Widths

In the case of an exit being compromised by a fire, there must be three exits 850mm or more in width. For the workshop, there would be three exits that achieve this after discounting one exit.

2.4.3 Inner Rooms

In accordance with Clause 4.10 of ADB, inner rooms are acceptable if the following conditions are satisfied:

- The occupant capacity of the inner room does not exceed 60
- The inner room should be accessed directly from the access room
- The escape route from the inner room should not pass through more than one access room
- The travel distance from within the inner room to the exit of the access room should be within the travel distance limits
- The access room should not be a place of special fire hazard

One of the following arrangements must be made:

- Enclosures of inner room should be stopped at a minimum of 500mm below the ceiling, or
- A vision panel of minimum size 0.1m² located in the door or wall of the inner room, or
- Access room fitted with suitable automatic fire detection and alarm system to warn occupants of the inner room of a fire in the access room

The travel distances from the inner rooms in the workshop exceed the distances referenced in Section 2.2.1, if the workshop is classed as a high hazard area. It is not possible to confirm the workshop as a normal hazard until the contents have been specified. The inner room travel distance concern can be rectified by including an additional door from the selected areas direct to outside.

3 B2 - Internal Fire Spread (Lining)

This section deals with the following Functional Requirement from Part B2 of Schedule 1 of the Building Regulations 2010.

Functional Requirement

B2. Internal Fire Spread (Linings)

(1) To inhibit the spread of fire within the building, the internal linings shall—

- (a) Adequately resist the spread of flame over their surfaces; and
- (b) Have, if ignited, either a rate of heat release or a rate of fire growth, which is reasonable in the circumstances.

(2) In this paragraph 'internal linings' means the materials or products used in lining any partition, wall, ceiling or other internal structure.

All walls and ceiling linings should conform to Table 10 of ADB and listed in Table 10 below. These specifications will be further refined in the fire strategy report submitted for building regulations approval.

Table 10: Classification of Linings

Location	European Class ^{A)}
Small rooms area of not more than 30m ² in non-residential accommodation	'D-s3,d2'
Rooms, other	'D-s3,d2'
Other circulation spaces including the common areas of blocks of flats	'B-s3,d2'

Note:

A) When a classification includes 's3, d2' this means there is no limit set for smoke production and/or flaming droplets of particles.

4 B3 - Internal Fire Spread (Structure)

This section deals with the following Functional Requirement from Part B3 of Schedule 1 of the Building Regulations 2010.

Functional Requirement

B3. Internal Fire Spread (Structure)

(1) The building shall be designed and constructed so that, in the event of fire, its stability will be maintained for a reasonable period.

(2) A wall common to two or more buildings shall be designed and constructed so that it adequately resists the spread of fire between those buildings.

For the purposes of this sub-paragraph a house in a terrace and a semi-detached house are each to be treated as a separate building.

(3) Where reasonably necessary to inhibit the spread of fire within the building, measures shall be taken, to an extent appropriate to the size and intended use of the building, comprising either or both of the following—

- a) Sub-division of the building with fire-resisting construction;
- b) Installation of suitable automatic fire suppression systems.

(4) The building shall be designed and constructed so that the unseen spread of fire and smoke within concealed spaces in its structure and fabric is inhibited.

4.1 Structural Fire Resistance

This section deals with the following Functional Requirement from Part B3 of Schedule 1 of the Building Regulations 2010:

- In accordance with Table B4 in ADB, structural fire resistance for the workshop building should provide fire resistance of 60 minutes, as the height of the top floor above ground level is not more than 5 metres. If it is sprinklered, this can be reduced to 30 minutes.
- Structural fire resistance for the amenity building should provide fire resistance of 30 minutes, as the height of the top floor above ground level is not more than 5 metres.

4.2 Compartmentation

PartB has annotated floor plans provided to reflect the following:

- Travel distance
- Fire resistance requirement
- Compartment lines
- Fire door and grades
- Fire service access

Compartmentation ratings in accordance with ADB are shown in the Appendix - Fire Strategy . Please note that the fire strategy mark-up shows the fire safety requirement and does not reflect any additional requirements.

4.2.1 Compartmentation Sizes

Table 11: Maximum dimensions of building or compartment (non-residential buildings) (Source: Table 12 ADB)

Purpose Group of building or part	Height of floor of top storey above ground level (m)	Floor area of any one storey in the building or any one storey in a compartment (m ²)	
		In multi-storey buildings	In single-storey buildings
Office	No limit	No limit	No limit
Industrial			
Not sprinklered	Not more than 18	7000	No limit
	More than 18	2000	N/A
Sprinklered	Not more than 18	14000	No limit
	More than 18	4000	N/A

The office floor area is approximately 750m² per storey and satisfies the maximum compartment sizes within Table 12 of ADB.

The workshop floor area has a floor area of approximately 1500m² and this satisfies the maximum compartment sizes stated within Table 12 of ADB. It is important to note that if Liquefied petroleum gas (LPG) or similar flammable substances are stored within the workshop then alternative guidance will need to be consulted. The area would be subject to the Dangerous Substances and Explosive Atmospheres Regulations, and a further risk assessment will be required.

4.3 Storage Area Separation and Permitted Areas

The Natural Resources Wales (NRW) Fire Prevention and Mitigation Plan (FPMP) guidance sets out requirements for the management and separation of waste stockpiles to reduce the risk of fire spread, facilitate effective firefighting operations, and limit heat transfer between stored materials. Separation distances are determined by the geometry of the stockpiles, including their height, width and fire frontage, with larger stockpiles requiring greater separation distances. The guidance also requires suitable access for Fire and Rescue Service appliances, adequate firebreaks, and appropriate separation from site boundaries, buildings and other sensitive receptors.

At the proposed facility, only ferrous scrap metal will be accepted and stored. Ferrous scrap is inherently non-combustible and therefore presents a significantly lower fire risk than the

combustible waste streams typically addressed within the NRW FPMP guidance. Consequently, the overall fire risk associated with the storage of the material is considered to be low. The site layout will continue to provide appropriate access for Fire and Rescue Service operations and maintain the relevant boundary clearances and operational controls required by the guidance.

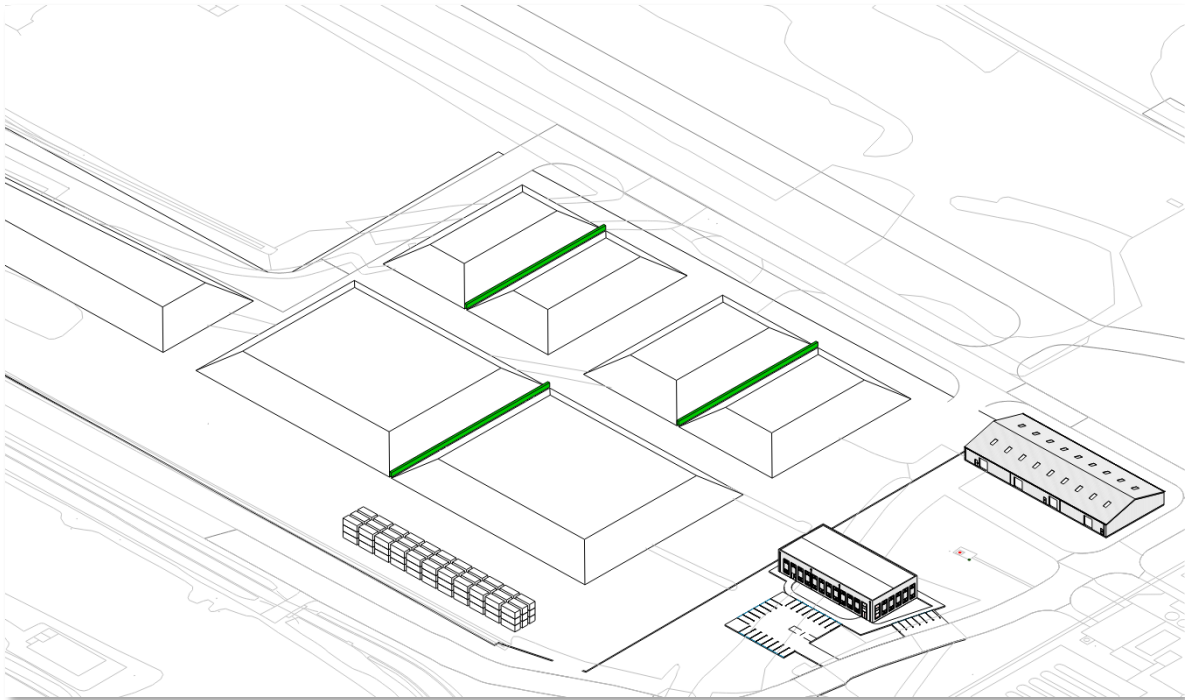


Figure 2: Concrete Separation Highlighted in Green (Source: Lawray Architects)

Where storage is provided within containers, the fire risk will vary depending on the material being stored. In the case of ferrous scrap metal, the inherent fire risk is considered to be low due to the non-combustible nature of the material. However, it is important to be aware that containers may still present fire-related considerations, including the potential for contamination from mixed wastes, external fire exposure, and access for firefighting operations, and these factors should be accounted for in the overall fire strategy.

4.4 Protection of Opening & Firestopping

Where services pass through the compartment floors and walls, the penetrations will be firestopped by suitable means to ensure the fire resistance of the compartment is not degraded.

PartB recommends using an accredited and tested proprietary fire barrier system. These will be confirmed within the RIBA Stage 4 fire strategy report submitted for building regulations approval.

5 B4 - External Fire Spread

This section deals with the following Functional Requirement from Part B4 of Schedule 1 of the Building Regulations 2010

Functional Requirement

B4. External Fire Spread

(1) The external walls of the building shall adequately resist the spread of fire over the walls and from one building to another, having regard to the height, use and position of the building.

(2) The roof of the building shall adequately resist the spread of fire over the roof and from one building to another, having regard to the use and position of the building.

5.1 Regulation 7

Requirement B4 of the Building Regulations regards the external wall construction. The building design will need to conform with both Requirements of B4 and Regulation 7. Regulation 7 is a prescriptive requirement and therefore engineering judgements (alternative solutions, e.g. risk assessment, or 'boxing in' of non-compliant materials) are not permitted under Regulation 7.

5.2 Unprotected Areas

During a fire event, heat will radiate through non-fire-resisting openings in the external walls of the building. This heat can be so significant that heat radiation through the unprotected openings is sufficient to set adjacent buildings on fire. To reduce the possibility of this transpiring, the Building Regulations place restrictions on the area of unprotected areas on external elevations.

Walls within 1000mm (1 metre) of the site boundary, which have no openings, will provide 60 minutes' fire resistance (integrity and insulation) from both sides. If the external walls are less than 1 metre from boundary, small openings (up to 1m²) in the external wall can be permissible, depending on size and separation.

For external walls more than 1 metre from boundary, BRE Report BR187⁶ has been applied as a suitable method for calculating minimum boundary distances or maximum unprotected areas, as recommended in ADB. This approach will take place at RIBA Stage 3 and it assumes:

- There is full flashover fire throughout the compartment
- Any fire resistance (EI) less than 60 minutes has failed
- Heat is emitted from all unprotected openings

⁶ BRE Report BR187:2014 External fire spread – Building separation and boundary distances

Upon initial review there are no buildings in close proximity and there is an adequate boundary distance to the workshop or office building. This allows the proposed openings to be 100% unprotected. An in-detail enclosing rectangle assessment will be undertaken during RIBA Stage 3 to confirm this. PartB requests elevation drawings showing the unprotected doors on the external walls.

5.3 External Walls

The external surfaces of the building should conform to the guidance of Table 12.1 of ADB Volume 2.

This does not restrict the combustibility of materials on walls more than 1 metre from the relevant boundary on buildings under 18 metres in height. External surfaces less than 1 metre from boundary should be of European Class 'B-s3, d2' or better for surface spread of flame.

5.4 Roof Covering

Table 12: Roof Coverings

Designation of Covering of Roof or Part of Roof ⁽¹⁾	Distance from Any Point on the Relevant Boundary			
	Less than 6 metres	At Least 6 metres	At Least 12 metres	At Least 20 metres
B _{ROOF} (t4)	■	■	■	■
C _{ROOF} (t4)	□	■	■	■
D _{ROOF} (t4)	□	■ ⁽²⁾⁽³⁾	■ ⁽²⁾	■
E _{ROOF} (t4)	□	■ ⁽²⁾⁽³⁾	■ ⁽²⁾	■ ⁽²⁾
F _{ROOF} (t4)	□	□	□	■ ⁽²⁾⁽³⁾

■ Acceptable. □ Not Acceptable.

1. The designation of external roof surfaces is explained in Appendix B.
2. Not acceptable on any of the following buildings.
 - a. Dwellinghouses in terraces of three or more dwellinghouses.
 - b. Any other buildings with a cubic capacity of more than 1500m³.
3. Acceptable on buildings not listed in (1) if both of the following apply.
 - a. Part of the roof has a maximum area of 3m² and is a minimum of 1500mm from any similar part.
 - b. The roof between the parts is covered with a material rated class A2-s3, d2 or better.

The roof covering should comply with the recommendation of Section 14 of ADB volume 2. Based on the distance to the relevant boundary more than 20 metres, the roof covering should be at least D_{Roof} (t4).

5.5 Boundary Distances

The separation distances based on the requirements contained within Natural Resources Wales (NRW) Fire Prevention and Mitigation Plan (FPMP) guidance for the storage of combustible waste.

In accordance with the NRW FPMP guidance:

- Combustible waste stockpiles shall be separated by a minimum distance of 6 metres to minimise the risk of fire spreading between stockpiles and to provide sufficient space for firefighting operations.
- A minimum separation distance of 6 metres shall be maintained between all waste (whether stored in stockpiles, skips, or containers) and the site boundary, buildings, plant, structures, or other combustible or flammable materials.
- These separation distances are maintained to reduce the potential for fire spread, protect neighbouring receptors and site infrastructure, and ensure adequate access for emergency service vehicles and firefighting personnel.
- Routine site inspections and operational controls will ensure that the required separation distances are maintained throughout the site's operation.

6 B5 - Access & Facility for The Fire Service

This section deals with the following Functional Requirement from Part B5 of Schedule 1 of the Building Regulations 2010:

Functional Requirement

B5. Access and Facilities for the Fire Service

(1) The building shall be designed and constructed so as to provide reasonable facilities to assist fire fighters in the protection of life.

(2) Reasonable provision shall be made within the site of the building to enable fire appliances to gain access to the building.

6.1 Firefighting Access

6.1.1 Road Access

The vehicle access roadway should be in accordance with the following Table 20 in ADB.

Table 13: Vehicle Access Requirements

Appliance Type	Width of Road Between Kerbs (metres)	Width of Gateways (metres)	Turning Circle Between Kerbs (metres)	Turning Circle Between Walls (metres)	Clearance Height (metres)	Carry Capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	12.5
High Reach	3.7	3.1	26	29	4	17

It is also important to note that the road width should be a minimum of 3.7 metres between kerbs.

6.1.2 Scrapyard Access

Adequate access shall be provided to all scrap metal storage areas to enable safe and effective firefighting operations. In accordance with the Natural Resources Wales (NRW) Fire Prevention and Mitigation Plan (FPMP) Guidance, access routes should remain unobstructed and provide suitable access around stockpiles to facilitate firefighting operations.

Fire appliance access should also accord with the principles of Approved Document B (ADB), including suitable access roads, turning facilities and hardstanding capable of supporting Fire and Rescue Service vehicles, ensuring all areas of the site can be reached safely during an emergency.

6.1.3 Building Access

In accordance with Section 15.1 in ADB, for all small buildings up to 2000m² with a top storey up to 11 metres above ground level, vehicle access for the pump appliance should be provided to whichever is less onerous of the following:

- 15% of the perimeter, or
- Within 45 metres of every point of the footprint of the building

From the site plan, both the office and workshop building provide access to more than 15% of each building's perimeter, 24% and 41% respectively.

In Figure 3 and Figure 4 below the number in blue indicates the accessible perimeter and the number in orange indicates the inaccessible number.

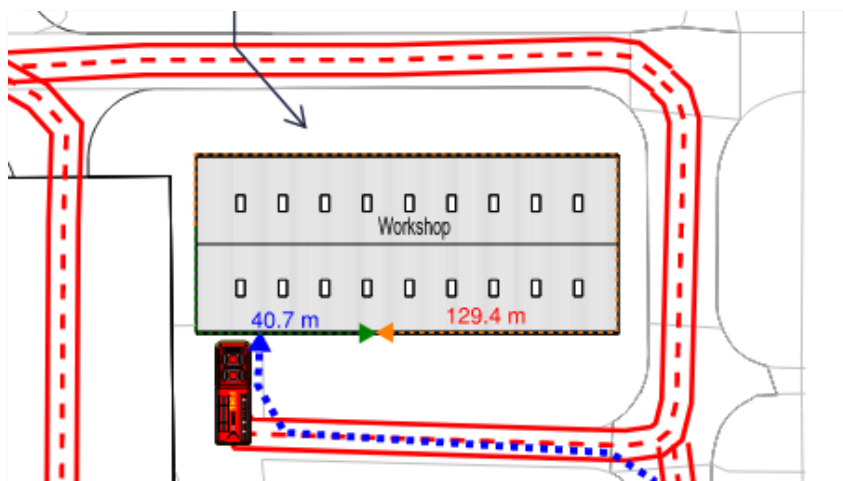


Figure 3: Workshop Fire Service Access (Source: Lawray Architects)

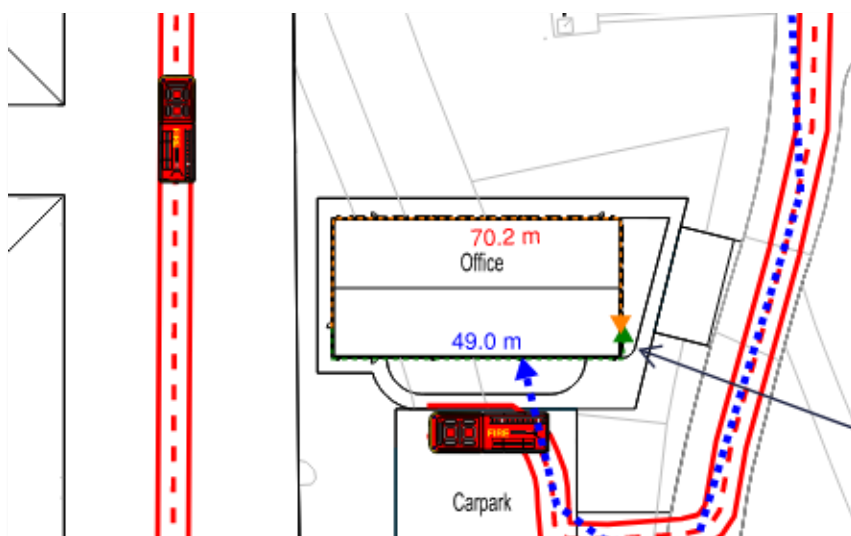


Figure 4: Office Fire Service Access (Source: Lawray Architects)

6.2 Water Supply/Fire Hydrant

6.2.1 Scrapyard

Firefighting water supply shall be provided in accordance with the Natural Resources Wales Fire Prevention and Mitigation Plan Guidance. The required volume shall be sufficient to address the credible worst-case fire scenario for the site and shall be determined through fire risk assessment and consultation with the Fire and Rescue Service. Reliance on the minimum 45,000-litre provision referenced in Approved Document B shall not be considered sufficient in isolation for environmental protection purposes. For high-risk waste storage areas approximately 3 hours firefighting capacity is required, however as this storage is ferrous material with a relatively low fire load, the site wide hydrant system is expected to be sufficient.

6.2.2 Office/Workshop

The building should have an existing fire hydrant located within 100 metres of the building entrance. A building requires an additional fire hydrant if both of the following apply. PartB requests a confirmation of the hydrant location, if it is available.

- It has a compartment within an area of more than 280m²
- It is being erected more than 100 metres from an existing fire hydrant

PartB identifies that, based on the information currently available, there is no existing fire hydrant within the recommended distance of the workshop building. To demonstrate compliance, the required fire hydrant locations have been indicated within Appendix - Fire Strategy Mark-Up. These locations are indicative of the hydrant provision required to satisfy the guidance. The client has agreed in principle to the installation of the additional fire hydrants identified, with the final locations and detailed design to be developed as part of the site infrastructure design.

Where the provision of a fire hydrant within the recommended distance cannot be achieved, the following alternative firefighting water supplies should be considered in consultation with the Fire and Rescue Service:

- A charged static water tank of at least 45,000 litre capacity, or
- Any other means of providing a water supply for firefighting operations considered appropriate by the fire and rescue authority
- Additional tanks are to be located within 90 metres of the building entrance point

6.3 Fire Run off Water / Separators

A key environmental concern associated with fire risk at the scrap metal storage site is the potential for firewater contamination arising from firefighting activities. In the event of a fire, contaminated runoff may contain hydrocarbons, heavy metals, suspended solids and combustion by-products, which could pose a significant risk to surface water, groundwater and surrounding drainage infrastructure.

To mitigate this risk, the site should incorporate appropriate pollution control measures such as interceptor tanks, attenuation systems, and/or engineered swales, designed to capture, treat and contain contaminated firewater prior to discharge. These measures should be integrated into the site drainage strategy by drainage consultants to ensure that any contaminated runoff is retained on site during an incident and prevented from entering surface water drains, foul systems or the wider environment.

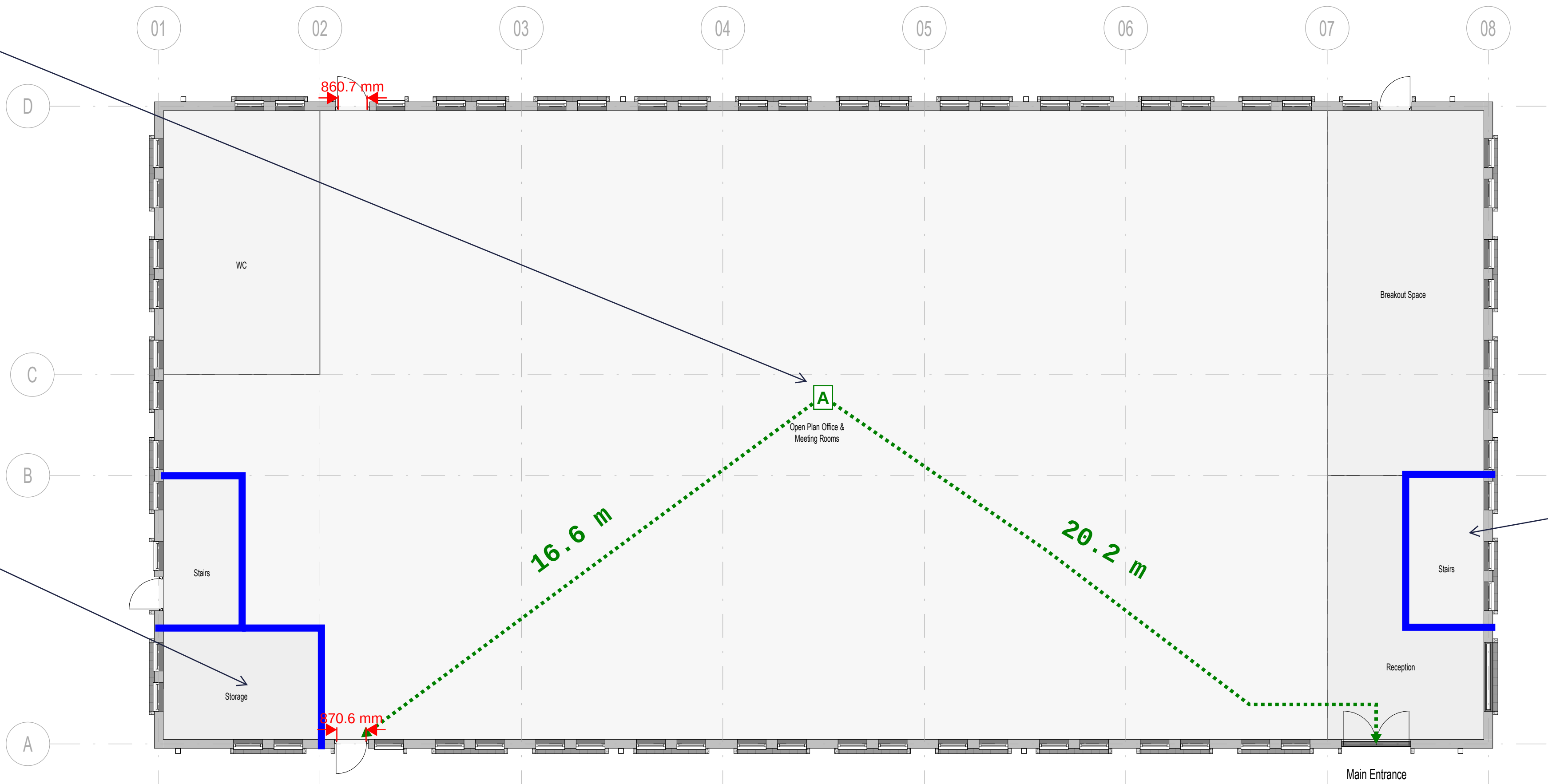
7 Appendix - Fire Strategy Mark-Up

PartB Travel distance comment
Office
The direct distance is taken as 2/3rd of the travel distance as the internal layout is unknown.
Travel distance A-B = 16.6m
(direct 2/3rds) -> **24.9m**
Permitted travel distance in more than one direction = 45m
COMPLIANT
Multiple directions of travel are available and are within the 45m maximum travel distance given in Table 2 of ADB Wales. The internal layout is unconfirmed, in order to make the most accurate travel distance compliance statements this should be provided.

PartB Fire Safety Design Comment
Storage area requires 30-minute fire resisting enclosure. Storage room door not included in plans it should be a FD30S door.

- Legend**
- FD30 Doorset
 - FD30S Doorset
 - FD60 Doorset
 - FD60S Doorset
 - FD90 Doorset
 - FD90S Doorset
 - FD120 Doorset
 - FD120S Doorset
 - 30 Minutes Fire Resisting Construction
 - 60 Minutes Fire Resisting Construction
 - 90 Minutes Fire Resisting Construction
 - 120 Minutes Fire Resisting Construction
 - 180 Minutes Fire Resisting Construction
 - 240 Minutes Fire Resisting Construction
 - Travel Distance (Compliant)
 - Travel Distance (Non-compliant)
 - Final Exit
 - Re-entrant Corner
 - Disabled Refuge
 - Occupancy Number
 - Door to be added
 - Door to be removed

PART B



Area 25_Office_Ground Floorplan
1 : 100

PartB Fire Safety Design Comment
The stair well enclosure should ideally discharge direct to the outside which is unconfirmed from these plans. If the stair discharges into a shared escape route then the merging flow will need to verified with expected occupancy numbers.

Project Title		EAF Project Port Talbot
Drawing Title		Compliance Statement - Scrap Handling Facility - Ground Floor Office Building
Drawing Number		EAF-PTB-XX-ZZ-DR-FE-3001
Revision 01	Date	22.07.26
Drawn by	Max Mejzner	PartB Group Pera Business Park Nottingham Road Melton Mowbray LE13 0PB
Reviewed by	Poppy Bluck	

PART B

Legend

●

FD30 Doorset

●

FD30S Doorset

●

FD60 Doorset

●

FD60S Doorset

●

FD90 Doorset

●

FD90S Doorset

●

FD120 Doorset

●

FD120S Doorset

—

30 Minutes Fire Resisting Construction

—

60 Minutes Fire Resisting Construction

—

90 Minutes Fire Resisting Construction

—

120 Minutes Fire Resisting Construction

—

180 Minutes Fire Resisting Construction

—

240 Minutes Fire Resisting Construction

—

Travel Distance (Compliant)

—

Travel Distance (Non-compliant)

FE

Final Exit

●

Re-entrant Corner

⚠

Disabled Refuge

ⓧ

Occupancy Number

ⓧ

Door to be added

ⓧ

Door to be removed

■

Inner Room

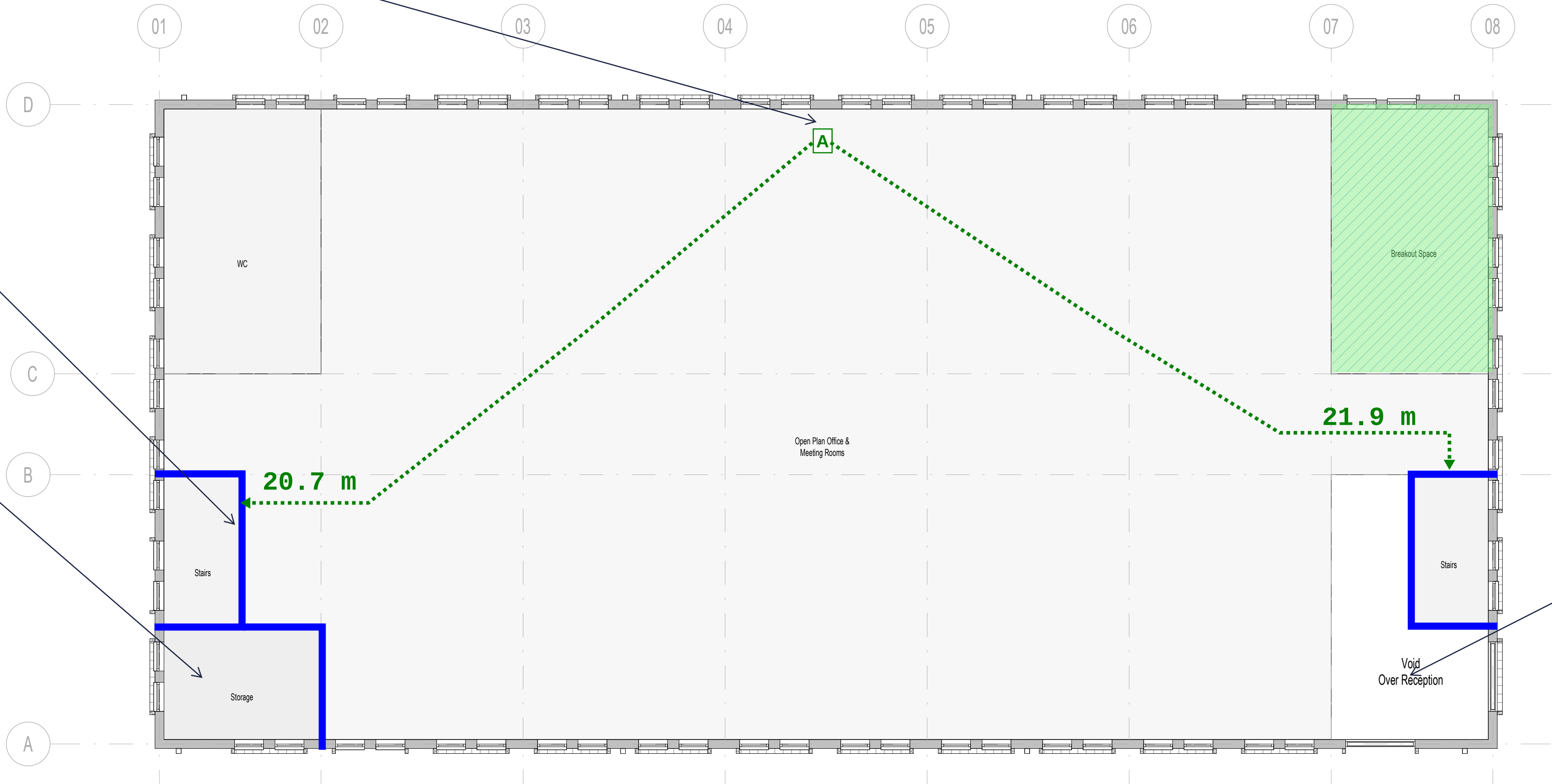
PART

B

PartB Travel distance comment
Office
The direct distance is taken as 2/3rd of the travel distance as the internal layout is unknown.
Travel distance A-B = 20.7m (direct 2/3rds) -> **31.1m**
Permitted travel distance in more than one direction = 45m
COMPLIANT
Multiple directions of travel are available and are within the 45m maximum travel distance given in Table 2 of ADB Wales. The internal layout is unconfirmed, in order to make the most accurate travel distance compliance statements this should be provided.

PartB Fire Safety Design Comment
Stair door not included in plans it should be a FD30S door.

PartB Fire Safety Design Comment
Storage room door not included in plans it should be a FD30S door.



Area 25_Office_First Floorplan
1:100

PartB Fire Safety Design Comment
The void does not need fire resisting construction in between the office as there are alternative escape routes from this floor. If the fire load in the reception below is high then potentially a 30-minute fire resisting separation should be added.

Project Title

EAF Project Port Talbot

Drawing Title

Compliance Statement - Scrap Handling Facility - First Floor Office Building

Drawing Number

EAF-PTB-XX-ZZ-DR-FE-3001

Revision 01

Date 22.07.26

PartB Group
Pera Business Park
Nottingham Road
Melton Mowbray
LE13 0PB

Drawn by

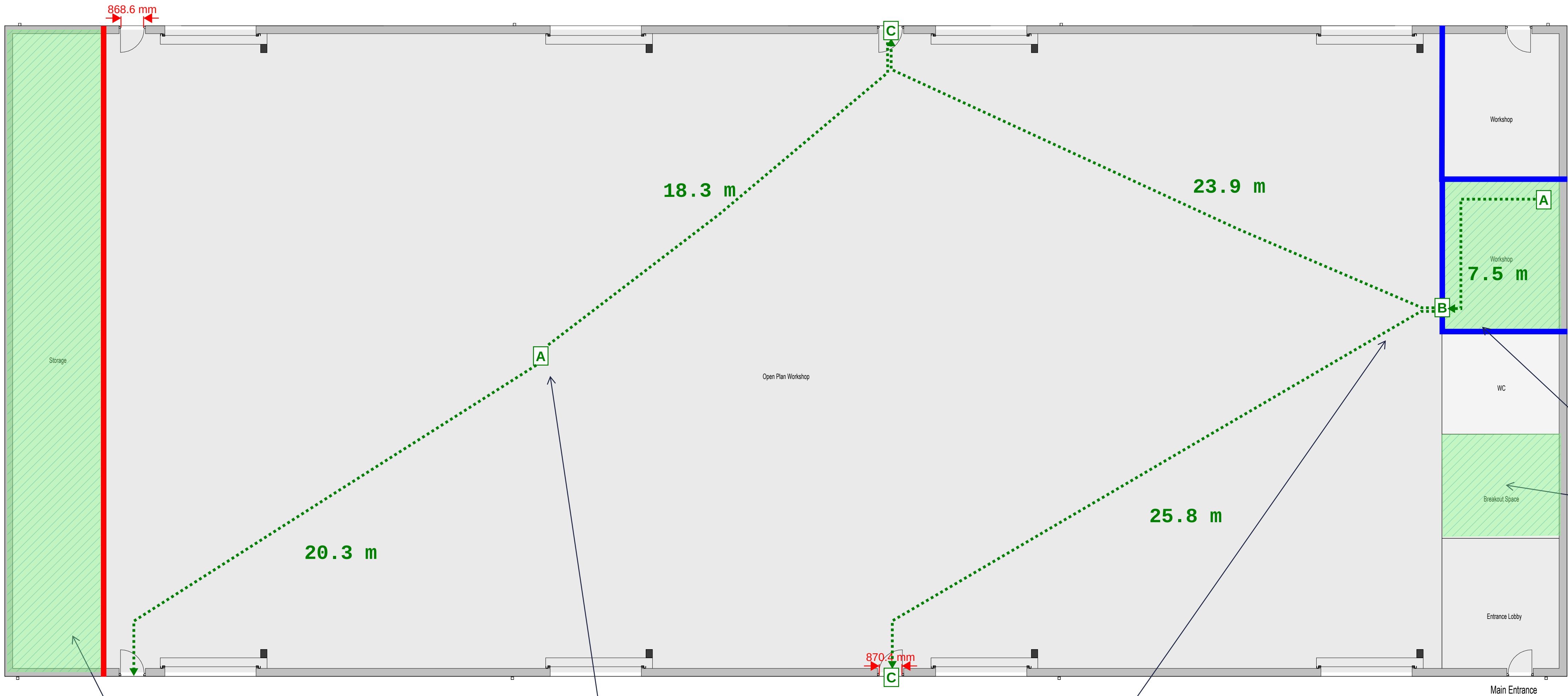
Max Mejzner

Reviewed by

Poppy Bluck

PART

B



Legend

FD30 Doorset

FD30S Doorset

FD60 Doorset

FD60S Doorset

FD90 Doorset

FD90S Doorset

FD120 Doorset

FD120S Doorset

30 Minutes Fire Resisting Construction

60 Minutes Fire Resisting Construction

90 Minutes Fire Resisting Construction

120 Minutes Fire Resisting Construction

180 Minutes Fire Resisting Construction

240 Minutes Fire Resisting Construction

Travel Distance (Compliant)

Travel Distance (Non-compliant)

FE

Final Exit

Re-entrant Corner

Disabled Refuge

Occupancy Number

Door to be added

Door to be removed

Inner Room

PART

B

PartB Fire Safety Design Comment
Inner rooms along this elevation should be provided with doors directly to the external environment to mitigate the risk of excessive travel distances. This is particularly important as the workshop's hazard classification is currently unknown; if deemed high hazard, the existing travel distances will be non-compliant.

PartB Fire Safety Design Comment
Storage room door not included in plans it should be a FD30S door. Store room should be enclosed in 60-minute fire resisting construction due to the floorspace size. The substances within the store are unknown and it is assumed as high hazard and therefore PartB recommends there be at least two exits from the store, preferably one direct to outside. To satisfy below travel distance requirements.

Travel distance from within the store room.
Normal Hazard
One direction = 25m
More than one direction = 45m

High Hazard
One direction = 12m
More than one direction = 25m

PartB Travel distance comment
Industrial
The direct distance is taken as 2/3rd of the travel distance as the internal layout is unknown.
Travel distance A-B = 18.3m (direct 2/3rds) -> **27.5m**
Permitted travel distance in more than one direction for **normal hazard** = 45m
Permitted travel distance in more than one direction for **high hazard** = 25m
COMPLIANT
Multiple directions of travel are available and are within the 45m maximum travel distance given in Table 2 of ADB Wales. However if the workshop is deemed as a high hazard area then the travel distances will be non compliant due to the reduction in allowable distances.

PartB Fire Safety Design Comment
Internal layouts have not been marked up, door locations have not been included.
Doors to the workshop areas should be FD30S.
Fire Load over the general workshop floor is unknown.

Project TitleEAF Project Port Talbot

Drawing TitleCompliance Statement - Scrap Handling Facility - Workshop Building

Drawing NumberEAF-PTB-XX-ZZ-DR-FE-3001

Revision 01Date22.07.26

PartB Group
Pera Business Park
Nottingham Road
Melton Mowbray
LE13 0PB

Drawn byMax Mejzner

Reviewed byPoppy Bluck

PARTB

PartB Fire Safety Design Comment
Environment agency gives guidance on fire prevention plans for storing waste. It states for separation distances you must:
> store your combustible waste piles with a separation distance of at least 6 metres
> have a separation distance of at least 6 metres between waste (whether in piles or containers) and the site perimeter, any buildings, or other combustible or flammable materials.

PartB Fire Safety Design Comment
The exact materials stored are not specified and therefore the combustibility of the waste can't be accurately verified.
Also the storage type has not been specified as risk levels will alter depending on whether the waste piles are open-air, within containers or enclosed in a structure with a roof.

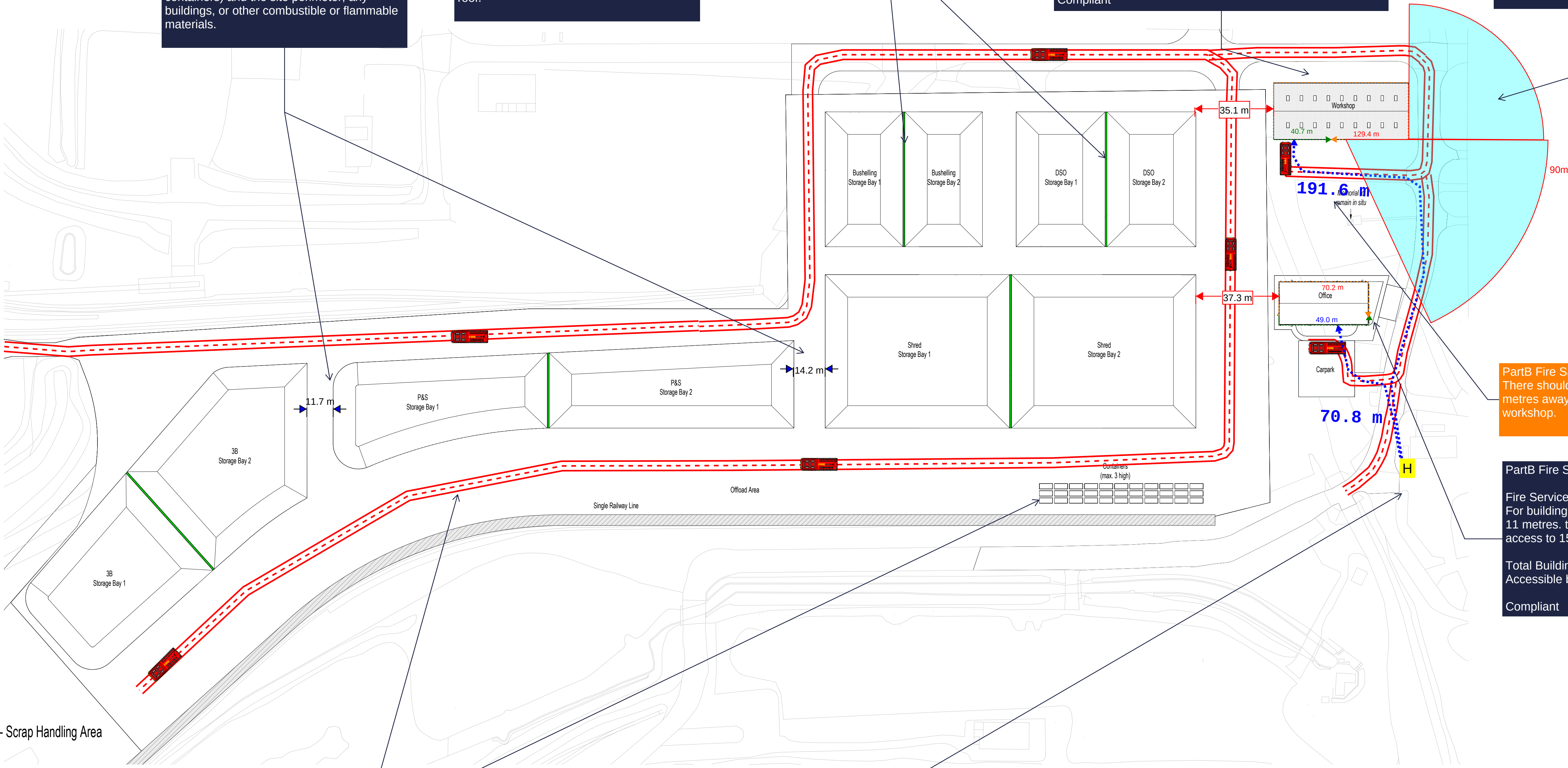
PartB Fire Safety Design Comment
Green lines indicate 1.6 metre high concrete blockwork wall separating waste heaps.

PartB Fire Safety Design Comment

Fire Service Access.
For buildings less than 2000m^2 and below 11 metres, the fire service should have access to 15% of the Building perimeter

Total Building perimeter = 170.1m
Accessible building perimeter = 40.7m (24%)
Compliant

PartB Fire Safety Design Comment
Indicative area of where new hydrants can be installed to be within the tenable limits and comply with Approved Document B. New hydrants are expected to be within 90 metres of the building entry point, a conservative area has been taken as the topography of the land is unknown.



PartB Fire Safety Design Comment
There should be a fire hydrant provision 90 metres away from the entry point of the workshop.

PartB Fire Safety Design Comment

Fire Service Access.
For buildings less than 2000m^2 and below 11 metres, the fire service should have access to 15% of the Building perimeter

Total Building perimeter = 119.2m
Accessible building perimeter = 49m (41%)
Compliant

PartB Fire Safety Design Comment
Confirmation on the contents of the containers and whether there will be a marked road around the scrap yard for the fire service access. This access road for the fire service should be a minimum of 3.7 metres.

PartB Fire Safety Design Comment
One Hydrant location identified on the plans as a pumping appliance connected to water supply.

The buildings located outside of the scrap yard are not expected to be fitted with fire mains and therefore - hydrants should be provided within 90 metres of an entry point to the building and not more than 90 metres apart.

The office is within the 90 metre threshold to an existing hydrant however the workshop building has no existing hydrant within 90 metres.

PartB Fire Safety Design Comment
Clause 16.8 ADB Volume 2 Wales
Where no piped water supply is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative source of supply should be provided in accordance with the following recommendations:

a) a charged static water tank of at least 45,000 litre capacity; or

b) a spring, river, canal or pond capable of providing or storing at least 45,000 litres of water at all times of the year, to which access, space and a hard standing are available for a pumping appliance; or

c) any other means of providing a water supply for firefighting operations considered appropriate by the fire and rescue authority.

Legend - Fire Service Access

DRI

DRO

Fire Appliance Route

Fire Appliance Parking Location

Fire Service Access Point

Fire Hydrant Location/s

Travel Distance (Non-compliant)

Accessible Building Perimeter

Project Title		EAF Project Port Talbot	
Drawing Title		Compliance Statement - Scrap Handling Facility - Site Plan	
Drawing Number		EAF-PTB-XX-ZZ-DR-FE-3001	
Revision 01	Date	22.07.26	PartB Group Pera Business Park Nottingham Road Melton Mowbray LE13 0PB
Drawn by	Max Mejzner		
Reviewed by	Poppy Bluck		
			PART B