

UPPER-TIER COMAH SITES EXTERNAL EMERGENCY PLAN PUBLICATION – Civil

Protection Service



1. EXECUTIVE SUMMARY

The Control of Major Accident Hazards Regulations 2015 (COMAH) places a statutory duty on all 'upper-tier' site operators to prepare, review and test internal emergency plans. A statutory duty is also placed on the Local Authority to prepare an external emergency plan and furthermore, the requirement to review and test external emergency plans. Regulation 14 of COMAH 2015 outlines the review and testing of emergency plans and states that the external emergency plan must be both reviewed and tested at least once every three years.

2. BACKGROUND

In December 2022 the Civil Protection Service coordinated Exercise Firecatte 4, which set out to provide sufficient scope for multi-agency partners, Plymouth City Council, the site operators (Valero and Greenergy), the Health and Safety Executive and the Environment Agency to test and validate relevant elements of the Plymouth Upper Tier COMAH Sites External Emergency Plan.

3. PROPOSED CHANGES AND REASONS

A significant level of operational and tactical learning points were identified during Firecatte 4. The below table highlights the overarching strategic recommendations emanating from the debrief and these have been used to inform the revised edition of the Plymouth Upper-Tier COMAH Sites External Emergency Plan, to be published in late 2023.

A copy of the plan is attached to the decision. In addition, a public version of the emergency plan will be available to view on the Plymouth City Council website at the end of the call-in period for the decision, providing that the decision is not called in: [Cattedown fuel distribution depot | PLYMOUTH.GOV.UK](https://www.plymouth.gov.uk/cattedown-fuel-distribution-depot)

STRATEGIC RECOMMENDATIONS FROM EXERCISE FIRECATTE 2022				
SERIAL NUMBER	RECOMMENDATION SUMMARY	RECOMMENDATION	LEAD/OWNER	COMPLETION DATE BY
1	Revision of Plymouth Upper-Tier COMAH Sites External Emergency Plan	Revision of the external plan taking into account comments made in the debrief process and any learning from other exercises/incidents	PCC	March 2024
2	Development of a Site Specific Activation Cascade	Creation of a bespoke agency notification/cascade plan to relevant agencies required to respond, as opposed to using Operation Link. This bespoke cascade could be included in the Police Op Ealing plan	PCC with DSFRS and Police	March 2024
		Wider conversation with the LRF about whether bespoke activation alerts for regulated sites (e.g. COMAH locations) would be more efficient than using the generic notification alert contained within Op Link	PCC and DCIOS LRF	March 2024

3	Possible expansion of the Domino Site grouping	PCC and the Competent Authorities to discuss how the Cattedown Wharves site could be included within the external plan, possibly as a further identified Domino site	PCC, HSE and EA	March 2024
4	Review of the Public Information Zone	A review of the PIZ should be undertaken in discussion with the Competent Authorities, to take into account changes at the site, building developments locally and the possible inclusion of Cattedown Wharves as a Domino site	PCC, HSE and EA	March 2024

4. ALTERNATIVE OPTIONS

There are no alternative options as this is a statutory external emergency plan and has agreed consensus from multi agency partners and our regulators, the Environment Agency and the Health and Safety Executive.

5. FINANCIAL IMPLICATIONS AND RISK

There are no financial implications for approving this plan. Work undertaken on behalf of the Operators (Greenenergy and Valero) is 100% cost recoverable. Any incident leading to a major accident hazard as defined in the regulations shall be dealt with as with any major emergency effecting a Plymouth community.

6. TIMESCALES

Although no publication date is set out in statute, it is widely seen as good practice to ensure a revised version of a multi agency plan is published within twelve months of an exercise.

Debs Brooker-Evans
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