

Consultee response for application **WP/20/00692/DCC** from **Emergency Management & Resillience**
25/08/2021

Dear Adrian,

Re: application number WP/20/00692/DCC

Emergency Planning (EP) Dorset Council have been consulted in the past on the application above, as well as submitted comments to both the MoD and ONR (Office for Nuclear Regulation) in respect of this development. The reason for this is because Portland Port provides an operational berth for Royal Navy nuclear powered warships (NPW's), hence this application also falls under the impact of REPPIR Regulations (2019).

The proposed development is located within the DEPZ (detailed emergency planning zone) in what the Portland Port off site reactor emergency plan is concerned, and very close to the ACMZ (automatic counter measures zone).

Having assessed application WP/20/00692/DCC , Dorset Council's Emergency Planning see however no major reason for not accommodating this application into the Portland Port off site reactor emergency Plan arrangements, similarly to all other businesses located and operating within this location (including PBUK – another COMAH site that EP also write an off-site plan for). We are prepared to work with the business to ensure that they are fully integrated into all our emergency plans, including some issues/considerations as below:

As per the current Portland Port off-site Reactor Emergency Plan, all businesses will have to be evacuated at declaration of OSNE (off site nuclear emergency) in a highly unlikely emergency stemming from the nuclear reactor of a MoD submarine. Does the business have, during its operation, processes that require constant supervision i.e. it is an 24/7 essentially manned building?

One consideration would look at the site possibly not being used during an NPW visit (These are very infrequent, and normally last between 1 week to 10 days). If this is not a viable economic option we can work around it, and include the proposed facility into our countermeasures plan (stable iodine pre-distribution). I note however that amongst the extensive feedback, the response received from the MoD (on May 11) does not show any particular concern about this application.

Another consideration refers to significantly increased traffic within the Port and via the main gate, as 'fuel/waste' is being transported to the incinerator by road. This increased traffic, and potential vehicle queues at the main gate, could delay or hinder the response of Emergency Services. To mitigate this however there is an option to use a secondary entrance from the top of the port, but its appropriateness needs fully investigated.

Similarly, the operation of any vessels in connection with the proposed facility will have to be controlled (possibly even stopped altogether) during an NPW visit to Portland Port. This applies to all other vessel movements within the Port, and the applicant must be aware of this.

The business should demonstrate that its operation does not pose any specific/increased risk to a visiting NPW (berthed at the 'Deep Water Berth'), or the wider port environment, including explosive risks, or more conventional ones, including an increased fire risk due to the specifics of the operation. This includes hazards such as the containerised gas solutions mentioned at section 6.184 of the ERF Planning Supporting Statement September 2020.

While Dorset Council's Emergency Planning is confident that the off-site planning arrangements for the operational berth at Portland Port, and PBUK COMAH site are robust enough to secure the protection of all the Port's employees, we would like the applicants to be aware of, and to consider some of the points above, which will need to be included into our emergency plans.

We acknowledge that comments above are mostly not EIA related – however in what the EIA is concerned, EP considers that the EA, Flood risk leads, Natural England, and other similar organisations are in a position to make more pertinent comments – including professional feedback re: impact on air quality and general pollution concerns.

Ovi Rominger
Emergency Mgt & Resilience Officer