

Gasoline Pipelines Land Use Planning Zones - Update

- 1 The last meeting of UKOPA's Gasoline Pipeline Operators Group was on 12 February 2007 at OPA's offices in London. At this meeting we agreed a proposed methodology for assessing risks to obtain Land Use Planning zones for gasoline pipelines.
- 2 The methodology was presented in detail to HSE on 2 November 2007 and this was followed up with a UKOPA briefing note to HSE in June 2008.
- 3 HSE appeared to have decided how they will set the Land Use Planning zones by raising it at the Emergency Planning Work Group meeting on 13 August.
- 4 The results of their assessment gives 50 metres Inner and Middle zone, and 80 metres Outer Zone. They continue to base the Inner zone on an arbitrary 50 metre radius pool of gasoline.
- 5 This appears to be contrary to the proposed UKOPA method which uses the equilibrium pool fire based on release rate to give the Inner zone, resulting in Inner zone distances of between 15 and 30 metres for UK pipelines. HSE Middle and Outer zones do not appear to be risk-based.
- 6 We have a choice of either accepting these zones or holding a meeting with HSE to dispute their methodology. In the light of the 8th Buncefield report (summary of main points below) which recommends that the operator should set Land Use Planning zones based on risk assessment, it may be useful to hold a meeting with HSE to discuss the issue.
- 7 Please could you let me know your views and how we should progress this.

R A McConnell

**Key Points arising from the Buncefield Major Incident
Investigation Board's 8th and final report
"Recommendations on Land Use Planning and the Control
of Societal Risk around Major Hazard Sites"**

1 This document makes important proposals which could make significant changes in the way Land Use Planning recommendations are made.

2 Two senior members of HSE were on the board of six members; Taf Powell, Director of HSE's Offshore Division, and David Ashton, Director of HSE's Field Operations North West and Headquarters Division, so the report must have HSE backing.

3 It identifies a serious disconnect between COMAH-type risk assessments carried out by the operator and the Land Use Planning controls applied by HSE and others.

4 They propose a system where the operator plays a much greater part in informing the planning authorities of the major hazard risks and their control measures; where stakeholders such as emergency responders have an input; and where the planning authority takes a clear and expert lead in the decision-making process.

5 A key change on the way the size of Land Use Planning zones are defined – they see the role of HSE as agreeing the methods by which planning consultation zones are derived, including the practical information that needs to be considered, but no longer being responsible for the actual technical assessment. HSE should adopt the role of regulatory overseer to the new regime, aligning with the Competent Authority's functions under COMAH (and PSR).

6 One the benefits they list is that account can be taken of the impact of risk reduction measures as the improved controls are applied – something we have argued for a long time.

7 In para 48 they state that in previous reports they have called for operators to improve their risk control measures, so it is therefore entirely consistent for operators to also conduct the main risk assessment process for land use planning and thereby contribute more effectively to the information on which the planning authority will make its planning decision. In return they will be informed and consulted about relevant developments on a more formal basis than at present.

8 In para 49 they state that currently HSE designates the consultation distance based on the information it receives from the planning authority arising from the operator's application for a hazardous substances consent. Following what they now say, the call should be made on site operators to undertake the necessary technical assessment from which the risk zone contours would be derived. It would be more consistent and effective for HSE to set the standards for technical contributions by COMAH operators to the planning system

around major hazard sites, and to check that the operators do so adequately.

9 The report calls for an urgent wide-ranging review of the planning system around major hazard sites. The review should be commenced without undue delay in order to implement its conclusions within a reasonable timeframe

10 Recommendation 8 Para 99 recommends that HSE universally adopts individual risk of fatality as the criterion for expressing the consequences of events, in preference to the risk of receiving a dangerous dose of worse.

11 Recommendation 13 Para 111 states – in moving to a fully risk-based system, and as part of the review process, there should be a wider perspective given to the management of new planning applications where off-site development already exists.

12 In Para 45 they state – we call for societal risk, whatever the current deficiencies in its estimation and application, to be integrated into the land use planning system around major hazard sites. Recommendation 14 recommends that HSE should bring together key stakeholders and experts in the planning system (planning authorities, developers, operators, regulators, risk assessment specialists) with a view to reaching agreement as early as possible on:-

- The way societal risk is measured
- The data sources required for assessment purposes
- The acceptability criteria for societal risk around particular sites
- A suitable weighting system for more serious less frequent events

13 Recommendation 15 Para 117 HSE should take necessary steps to amend PSR to extend Land Use and emergency planning controls (and other suitable regulatory protections if necessary) to major pipelines carrying gasoline (petrol).

14 In conclusion, the document supports many of UKOPA's long term objectives in this area, and require following up during our ongoing discussions with HSE.

R A McConnell