

**DCC/4472/2026 - Hazardous Substances Consent**  
**Devon Green Power Anaerobic Digestion Facility, Lloyd Maunder Road, Willand**

**WILLAND PARISH COUNCIL COMMENTS**

**1. Groundwater and Environmental Protection**

The Council notes that the site is located above groundwater resources and requests confirmation that appropriate measures are in place to prevent pollution of land and nearby watercourses. This should include suitable containment for fuels and chemicals, arrangements for managing spills and leaks, drainage controls and systems to contain contaminated firefighting water in the event of an incident.

The Council also requests confirmation that these measures have been reviewed by the Environment Agency and are considered adequate to protect the local environment.

**2. Emergency Planning and Community Protection**

The Council seeks assurance that suitable emergency arrangements will be in place before the facility becomes operational. These arrangements should clearly explain how incidents would be managed, how emergency services would be contacted and, where necessary, how neighbouring businesses and residents would be informed.

The Council also requests confirmation that emergency response procedures will be regularly reviewed and tested and that relevant organisations will be involved to ensure an effective response to any foreseeable emergency.

As the proposed development will operate as a Lower Tier COMAH site, the Council understands that a Major Accident Prevention Policy (MAPP) will be required. The Council requests confirmation that this policy will be in place before operation and will provide a clear framework for preventing major accidents and managing risks associated with hazardous substances on an ongoing basis.

**3. Traffic and Transport Impacts**

The Council requests confirmation that the impact of vehicle movements associated with the facility has been fully assessed, including LPG deliveries and carbon dioxide collections. This assessment should demonstrate that local roads can safely accommodate the expected traffic levels and that appropriate traffic management measures will be implemented to minimise risks to other road users, nearby businesses and residents.

Consideration should also be given to delivery routes, vehicle frequency and arrangements for managing traffic during abnormal events or emergencies.

**4. Fire and Explosion Risk**

The application identifies that hazardous substances will be present on site, including approximately 24 tonnes of LPG and 8.5 tonnes of flammable biogas. However, the information currently available

does not provide sufficient detail to demonstrate how fire and explosion risks will be managed and controlled

While the application refers to HAZOP (Hazard and Operability Study) and LOPA (Layers of Protection Analysis) process safety assessments and states that a Major Accident Prevention Policy (MAPP) will be developed as part of the site's Lower Tier COMAH obligations, the submitted information does not appear to show details of the above.

The documents provided do not include sufficient information regarding compliance with the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR). Specifically, no details have been provided on hazardous area classifications, the use of equipment suitable for operation within potentially explosive atmospheres (Ex-rated equipment), gas detection systems, emergency isolation and shutdown arrangements, or firewater containment measures.

The Council notes that neighbouring commercial premises are located approximately 10 metres from the site boundary and that residential properties are located approximately 90 metres away. Whilst the applicant states that risks will be reduced to a level that is As Low As Reasonably Practicable (ALARP), no information has been provided to demonstrate the potential effects of a major fire or explosion, including heat radiation, blast effects or the extent of any emergency planning zone. It is not currently possible to determine whether neighbouring businesses and residents would be adequately protected in the event of a major accident.

The Council therefore requests confirmation that appropriate fire and explosion risk assessments have been completed and that suitable mitigation measures will be implemented and maintained throughout the operational life of the site. These should include, where required, compliance with DSEAR, equipment suitable for hazardous areas, gas detection and alarm systems, emergency isolation arrangements, protection of LPG storage facilities from vehicle impact, effective firewater containment measures and a robust emergency response plan that is regularly tested and reviewed.

The Council also requests confirmation that potential impacts on neighbouring residents, businesses and the surrounding environment have been fully assessed and that the residual risks are considered acceptable by the relevant regulatory authorities.

## **5. Conclusion**

Willand Parish Council recognises the potential benefits of renewable energy generation and supports sustainable development in principle. However, given the quantities of hazardous substances proposed to be stored and processed on site, the Council considers it essential that robust environmental protection measures, effective emergency arrangements, appropriate traffic management controls and suitable fire and explosion risk mitigation measures are clearly demonstrated before any consent is granted.

The Council therefore requests that the Environment Agency, the Health and Safety Executive and other relevant statutory consultees confirm that these matters have been satisfactorily addressed before the site becomes operational.