

Gravesham Borough Council
Planning Service
Civic Centre
Windmill Street
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By email only

Your ref:20241069

FAO Lisa Fisher

Chemical Explosives and
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Stuart Reston – Team Leader

Date: 11 April 2025

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (ENGLAND) ORDER 2015 -
PLANNING APPLICATION 20241069 - ERECTION OF TWO STOREY SIDE EXTENSION
PITCHED ROOF AND FACADES TO MATCH THE EXISTING BUILDING EXTERNAL
FINISHES AND DIMENSIONS, CREATING 16 NO. ADDITIONAL BEDROOMS,
REPOSITIONING OF THE ESCAPE STAIR, REMODELLING OF THE
RECEPTION/OFFICE, LINEN STORE, STORE AND 1NO. EXISTING BEDROOM TO
PROVIDE A COMMUNAL LAUNDRY, A COMMUNAL KITCHEN AND TWO COMMUNAL
LOUNGES, AND A CHANGE OF USE FROM C1-HOTEL TO SUI GENERIS - HMO FOR
46 PERSONS RESIDING IN A SINGLE BUILDING - PREMIER INN , HEVER COURT
ROAD, GRAVESEND, KENT DA12 5UQ**

Dear Mrs Fisher,

Thank you for your letter of 8 April to the Land Use Planning (LUP) advice team of the Health and Safety Executive (HSE) requesting advice for the planning application for a change of use and additional bedrooms for the premier Inn at Hever Court Road.

1. HSE is a statutory consultee for this planning application by virtue of the Town and Country Planning (Development Management Procedure) (England) Order 2015 as it lies in the outer consultation zones of a major accident hazard pipeline – the 7094_1366 gas pipeline operated by National Gas Transmission. The role of HSE's LUP advice team is to provide local planning authorities with safety advice on new developments in the proximity of major hazard sites or major accident hazard pipelines.

2. HSE provides its advice by applying its LUP methodology

(<https://www.hse.gov.uk/landuseplanning/methodology.htm>). This uses a decision matrix with a combination of the consultation zone of the major hazard and the sensitivity level of the development to determine whether HSE either “Advises Against” (AA) or “Does Not Advise Against” (DAA) the granting of planning permission for the development.

3. The proposed extension to the building will result in 16 additional bedrooms – this is classed as a sensitivity level 2 development in HSE’s LUP methodology. HSE does not advise against a sensitivity level 2 development in the outer consultation zone of a major accident hazard pipeline.

4. In summary, HSE’s Land Use Planning advice team **does not advise**, on safety grounds, against the granting of planning permission for application 20241069.

5. As the proposed development is within the consultation distance of a major accident hazard pipeline, we consider that the pipeline operator should also be consulted before the case is decided. There are two particular reasons for this:

- The operator may have a legal interest (easement, wayleave, etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline.
- The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds.

Yours sincerely



Richard Lomax

Statutory and Commercial Land Use Planning Advice