

20250161 Britannia Refined Metals Ltd

HSE 27 February 2025

Thank you for your EIA scoping opinion request for any comments regarding 20250161 dated 26/02/2025 - Request for a scoping opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of an EIA Scoping Opinion in respect of the proposed construction of 3x wind turbines at Britannia Refined Metals Ltd, Botany Road, Gravesend, Kent, DA11 9BG.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 4(4) -

the vulnerability of the proposed development to major accidents relevant to the development

HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.

HSE is not responding in our regulatory role in the health and safety system

1. The proposed development, being wind turbines, is not a development type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Planning (Hazardous Substances) Regulations 2015.

2. The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.

3. The development is not located within HSE's land-use-planning consultation zones for major-accident-hazard pipelines and hazardous substances consented sites (licensed explosives sites are covered in the previous paragraph).

Due to the above 3 points, there appears to be no need to consult HSE.

4. If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please directly consult the operator of the establishment, as appropriate.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.