

Chemicals Explosives
Microbiological Hazards Division

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(by email only)
Gravesham Borough Council
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HSE Ref: L2326
Your Ref: 20240661

Date: 7 August 2024

For the attention of Mrs Lisa Fisher

Dear Mrs Fisher

**Land Use Planning Consultation with Health and Safety Executive
Town and Country Planning (Development Management Procedure) (England)
Order 2015**

Planning Application: 20240661

Proposal: Change of use from grazing use to dog exercise and training area and alterations to fencing.

Location: Land On East Side Of Church Street Higham Rochester Kent.

1. Thank you for your email of 5 August 2024 asking HSE to consult us regarding n planning application DM/23/03098/FPA.
2. The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the consultation distance of major hazard sites and major accident hazard pipelines. HSE's role as a statutory consultee in the planning process is to provide local planning authorities with advice on the risks to people at a proposed development from a major accident at a site in the vicinity storing or using hazardous chemicals. This consultation, is for such a development as it lies

within the inner and middle consultation distances of a major accident hazard pipeline:-

- National Grid Gas PLC - 18 Feeder Isle of Grain/Gravesend – Ref: 4057584_2786

3. The above planning application is for Use of land for secure dog for dog exercise and training areas. The proposal is to use the land for dog exercise and training and have in place a booking system so that only one person's dog or dogs are using the site at any one time. A 15 minute buffer time between the one hour sessions allows for solo bookings to use area at any one time., in very low numbers. HSE's Land Use Planning methodology allocates outdoor use by the public for up to 100 people, as a Sensitivity Level (SL) 2 development. HSE normally advises against a Sensitivity Level 2 development in the inner consultation zone of a major hazard site or major accident hazard pipeline.
4. However, the methodology also recognises there can be exceptional circumstances where HSE's methodology can be supplemented with more detailed consideration – see paragraph 10 of 'HSE's Land Use Planning Methodology' (www.hse.gov.uk/landuseplanning/methodology.pdf).
5. The very low occupancy of the proposed dog exercise and training facility (The field will be used as one area by one owner or dog carer at one time. A booking system so that the field is used for a maximum of 1 hour per user with 15 minutes buffer time between users which ensures that the previous user has left the field before the next user arrives and prevents meeting between dogs), leads HSE to conclude the risk to the public would be low in this situation.
6. Therefore, in conclusion, **HSE does not advise, on safety grounds, against the granting of planning permission in this case.**
7. If new or future proposals lead to an intensification of the use of this area by the public, for example: provision of facilities, greater numbers of public, events, etc. then HSE would wish to be consulted on any future planning applications.

8. As the proposed development is within the consultation distance of a major accident hazard pipeline, we consider 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 the 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

Sue Howe
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