

(by email only)
Gravesham Borough Council

Your Ref: 20211383

Date: 11 November 2021

For the attention of Peter Price

Dear Mr Price

Proposal: Screening and Scoping Request in respect of a proposed planning application for the installation of two additional bitumen tanks, load out gantry, the installation of a bitumen emulsion plant and alternative car parking.

Location: Imperial Wharf, Clifton Marine Parade, Gravesend, Kent DA11 0DY

Thank you for your Screening and Scoping request dated 9 November 2021 for the above proposed development.

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 on the control of major industrial hazards involving dangerous substances.
- HSE is not responding in our regulatory role in the health and safety system

1. Consideration of whether the development will store or use hazardous substances in quantities relevant to industrial major accidents

The proposed development does not appear to be of a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to Directive 2012/18/EU [see The Planning (Hazardous Substances) Regulations 2015 and The Control of Major Accident Hazard (COMAH) regulations 2015].

Science Division

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2. Consideration of whether the development is in an HSE Explosives safeguarding zone.

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. Consideration of whether the development is in an HSE land-use-planning consultation zone and therefore vulnerable to major accidents

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 was no need to consult HSE.

4. 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.

Yours sincerely

Kathryn Deakin

Statutory and Commercial Land Use Planning Advice