

Trafford Council
Strategic Planning and Development
Waterside House
Sale Waterside
Sale
Greater Manchester
M33 7ZF

Your Ref: Land Allocations Plan

Our Ref: 4.2.1.4085.

Hazardous Installations
Directorate

John Moran

CEM HD5C
2.2 Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

Tel: 0151 951 4551
Fax: 0151 951 4980
john.moran@hse.gsi.gov.uk

<http://www.hse.gov.uk/>

HM Principal Specialist Inspector
of Health and Safety
Dr Peter Harper

For the attention of Amarjit Doow-Powell (Senior Planner)

Date 9th June 2014

Dear Madam

CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY THE HSE

Land Allocations Plan

Thank you for your request to provide a representation on the Land Allocations Plan consultation document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved.

The HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with the HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents.
2. Regulation 10(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC (Seveso II)¹. Regulation 10(c)(i) requires that regard also be had to the need in the long

¹ Article 12 provides that the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in land-use policies, and these objectives should be pursued through controls on the siting of new establishments, modifications to existing establishments, and new developments in the vicinity of existing establishments such as transport links, locations frequented by the public and residential areas where the siting or development is such as to increase the risk or consequences of a major accident.

term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas.

At this early stage the HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to modify, relinquish or revoke hazardous substances consents². Planning authorities are advised to use HSE's *Planning Advice for Developments near Hazardous Installations Information Package (PADHI+)* to verify any advice given. Further information on PADHI+ is available on the HSE website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>.

PADHI+ cannot be used for developments around nuclear sites, explosives sites or quarries. In these cases you must consult the appropriate HSE directorate for advice. Guidance on consulting the HSE about developments that could encroach on specialised major hazard sites is also available on the website: <http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent>

Encroachment of Local Plan Allocations on Consultations Zones

We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. This conclusion has been reached by analysing the GIS data for proposed allocations sent to HSE on 13th May 2014. The allocations are listed in the appendices to this letter. Appendix A lists encroachment of the allocations upon hazardous installation consultation zones. Appendix B lists encroachment of the allocations upon MAHP consultation zones.

Compatibility of Development with Consultation Zones

The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.

Housing Allocations

Inner Zone – Housing is not compatible with development in the inner zone. PADHI+ would normally give an Advise Against decision for such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.

Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units *and* at a density of no more than 40 per hectare.

Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.

Workplace Allocations

Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building *and* less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m² total floor space are compatible with the inner zone.

² Hazardous substances consents are granted by the Hazardous Substances Authority (HSA), which is the planning authority. The consent process is regulated by the HSA under the Planning (Hazardous Substances) Regulations 1992 (as amended). The HSA must consult the HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent, this map defines the consultation distance within which HSE must be consulted over any relevant future planning applications.

Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.

Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with the middle zone.

Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are *only* compatible with the outer zone. Retail developments with more than 5000m² total floor space are compatible with the outer zone.

This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on *Development Type Tables* (pg.9) of *PADHI - HSE's Land Use Planning Methodology*, which is available at:
<http://www.hse.gov.uk/landuseplanning/padhi.pdf>

Mixed-Use Allocations

Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to PADHI+ to determine HSE's advice regarding mixed-use developments.

Verification of Advice using PADHI+

The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard installations and MAHPs can be found on the HSE extranet system along with advice on HSE's land-use planning policy. Lists of all major hazard installations and MAHPs, consultation zone maps for installations, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access the HSE's *Planning Advice for Developments near Hazardous Installations Information Package* (PADHI+) on the extranet; further information is available on the HSE website:
<http://www.hse.gov.uk/landuseplanning/padhi.htm>. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of PADHI+ could assist you in making informed planning decisions about development compatibility. We recommend that for speculative testing of advice that the PADHI+ training database is used. This is accessed on the land-use planning extranet services screen.

Identifying Consultation Zones in Local Plans

The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence³.

³ The HSE does not possess detailed up-to-date versions of pipeline maps. Therefore you are advised not to rely solely on the information contained in this representation as reflecting the current status of MAHPs that could effect your plan. Please refer to other sources of information, e.g. to local authority pipeline records, as pipeline operators have a duty to supply information on

Identifying Compatible Development in Local Plans

The guidance in *PADHI - HSE's Land Use Planning Methodology*, available at <http://www.hse.gov.uk/landuseplanning/padhi.pdf>, will allow you to identify compatible development within any consultation zone in the area of your local plan. The HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on *Development Type Tables* (pg.9) and the *Decision Matrix* (pg.17) are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

There are a number of factors that can alter a PADHI+ decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of PADHI+.

Provision of Information to Interested Parties – Pipeline Operators

The pipeline operators referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter.

If you have any questions about the content of this letter, please contact me at the address given in the letterhead.

Yours faithfully

John Moran
HM Specialist Inspector of Health and Safety (Risk Assessment)

pipelines including location to local authorities for emergency planning purposes. To further assist planning authorities in identifying the location and ownership of MAHPs, the HSE has provided a source of pipeline information on the HSE extranet pages at: <https://extranet.hse.gov.uk/Land%20Use%20Planning/padhi/piplines.htm>.

Appendix A – Encroachment of Land Allocations upon Hazardous Installation Consultation Zones

SHLAA	LAP_Site_Ref	Proposed	Site_Location	Grid_Ref	Operator	Zone	Hidci5_no	Gridref
1610		C3	Land adjacent to Manchester Ship Canal, Partington	371204 391692	National Grid Gas PLC	Outer	H0622	SJ 729 913
1610		C3	Land adjacent to Manchester Ship Canal, Partington	371204 391692	National Grid Gas PLC	Middle	H0622	SJ 729 913
1610		C3	Land adjacent to Manchester Ship Canal, Partington	371204 391692	Univar Ltd	Outer	H3680	SJ 718 922
1561		C3	Former Ortonbrook School site, Oak Road, Partington	371278 390586	National Grid Gas PLC	Outer	H0622	SJ 729 913
	CFS07-1254-003	C3	Land at 4 Lock Lane, Partington	371589 391616	National Grid Gas PLC	Middle	H0622	SJ 729 913
1639		C3	Former Red Brook Public House, Partington	371088 390623	National Grid Gas PLC	Outer	H0622	SJ 729 913
1639		C3	Former Red Brook Public House, Partington	371179 390593	National Grid Gas PLC	Outer	H0622	SJ 729 913
1510		Mixed Use	Land East of Partington Shopping Centre	371895 391330	National Grid Gas PLC	Middle	H0622	SJ 729 913
1510		Mixed Use	Land East of Partington Shopping Centre	371895 391330	National Grid Gas PLC	Inner	H0622	SJ 729 913
	Wharfside SL	Mixed Use	Wharfside Strategic Location	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Outer	H0704	SJ 797 973
	Wharfside SL	Mixed Use	Wharfside Strategic Location	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Middle	H0704	SJ 797 973
	Wharfside SL	Mixed Use	Wharfside Strategic Location	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Inner	H0704	SJ 797 973
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Inner	H0198	SJ 727 917
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Air Products plc	Outer	H0106	SJ 729 927
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Air Products plc	Middle	H0106	SJ 729 927
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Air Products plc	Inner	H0106	SJ 729 927
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Outer	H0198	SJ 727 917
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Middle	H0198	SJ 727 917
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Basell Polyolefins UK Ltd	Outer	H0499	SJ 738 920
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Basell Polyolefins UK Ltd	Middle	H0499	SJ 738 920
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Basell Polyolefins UK Ltd	Inner	H0499	SJ 738 920
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Outer	H0622	SJ 729 913
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Middle	H0622	SJ 729 913
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	National Grid Gas PLC	Inner	H0622	SJ 729 913
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Univar Ltd	Outer	H3680	SJ 718 922
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Univar Ltd	Middle	H3680	SJ 718 922
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Univar Ltd	Inner	H3680	SJ 718 922
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Nova Chemicals Europe Ltd	Outer	H3752	SJ 735 920
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Nova Chemicals Europe Ltd	Middle	H3752	SJ 735 920
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Nova Chemicals Europe Ltd	Inner	H3752	SJ 735 920
	WHA2	Mixed Use	Wharfside Strategic Location - MediaCity UK Area	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Outer	H0704	SJ 797 973
	WHA2	Mixed Use	Wharfside Strategic Location - MediaCity UK Area	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Middle	H0704	SJ 797 973
	WHA2	Mixed Use	Wharfside Strategic Location - MediaCity UK Area	380514 396638	Valero Logistics UK Ltd (pka Valero Ltd)	Inner	H0704	SJ 797 973

Appendix B – Encroachment of Land Allocations upon MAHP Consultation Zones

SHLAA	LAP_Site_Ref	Proposed	Site_Location	Grid_Ref	OPERATOR	ZONE	HSE_REF	REF	NAME_LOC
1561		C3	Former Ortonbrook School site, Oak Road, Partington	371278 390586	NGG	Outer	6741	1026	Warburton Tunnel South / Partington
1639		C3	Former Red Brook Public House, Partington	371088 390623	NGG	Outer	6741	1026	Warburton Tunnel South / Partington
1639		C3	Former Red Brook Public House, Partington	371179 390593	NGG	Outer	6741	1026	Warburton Tunnel South / Partington
1988		Mixed Use	Land at Talbot Road, Stretford	380286 395085	NGG	Outer	6740	1025	Warburton/Holford-Warburton to Budworth Road
1988		Mixed Use	Land at Talbot Road, Stretford	380286 395085	NGG	Middle	6740	1025	Warburton/Holford-Warburton to Budworth Road
1988		Mixed Use	Land at Talbot Road, Stretford	380286 395085	NGG	Inner	6740	1025	Warburton/Holford-Warburton to Budworth Road
1988		Mixed Use	Land at Talbot Road, Stretford	380286 395085	NGG	Inner	6739	1024	Turnmoss Road / Longford Road (Stretford)
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6731	1016	Partington/Northwich(Partington to Flitogate Lane)
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Outer	6731	1016	Partington/Northwich(Partington to Flitogate Lane)
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Middle	6731	1016	Partington/Northwich(Partington to Flitogate Lane)
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Inner	6799		STANLOW/CARRINGTON PIPELINES100 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Inner	6800		STANLOW/CARRINGTON PIPELINES150 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Middle	6799		STANLOW/CARRINGTON PIPELINES100 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Outer	6799		STANLOW/CARRINGTON PIPELINES100 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Outer	6800		STANLOW/CARRINGTON PIPELINES150 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	Shell UK Ltd	Middle	6800		STANLOW/CARRINGTON PIPELINES150 NS
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6728	1013	Partington LNG Boil Off (Storage Facility)
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Outer	6732	1017	Partington / Stockport
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Middle	6732	1017	Partington / Stockport
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6732	1017	Partington / Stockport
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Outer	6733	1018	Partington / Turnmoss Road
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6733	1018	Partington / Turnmoss Road
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Outer	6741	1026	Warburton Tunnel South / Partington
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6741	1026	Warburton Tunnel South / Partington
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Outer	6748	1032	4 Feeder Warburton / Partington
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Middle	6748	1032	4 Feeder Warburton / Partington
	Carrington SL	Mixed Use	Carrington Strategic Location	373242 392438	NGG	Inner	6748	1032	4 Feeder Warburton / Partington