

## APPENDIX 2 – COMMENTS BY THE HSE ON SITE AT STANFIELD ROAD

Mr Barker

Thank you for your enquiry and I have the following comments:-

In their response they mention the "safeguarding zone of the adjacent oil terminal...". It is not a safeguarding zone, it is a consultation zone (CD). I have absolutely no idea where the proposed gypsy site is proposed to be sited in relation to the CD but I can say with certainty that the CD, which has not changed, and is attached again for ease of reference, will be used for assessing the proposal should HSE be consulted for our formal advice. HSE sets land-use planning CD's and formulates advice on developments based upon them.

The references to Atkins are misleading. That related to an increase in consultation distances to 400 metres **at some but not all large scale petrol storage sites (petrol is classified as highly flammable)**. The Wymondham depot does not store petrol or any substances classified as highly flammable.

In essence, nothing has changed from our point of view.

Hope this helps

Paul

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**From:** Tim Barker [mailto:TBarker@S-NORFOLK.GOV.UK]

**Sent:** 17 June 2009 12:33

**To:** Paul Elliott

**Subject:** Proposed Gypsy & Traveller allocation near Wymondham storage depot (HSE Infoline ref HPHS-7KGE2K)

Dear Mr Elliot

I write with regard to a proposed allocation for a Gypsy and Traveller site that South Norfolk Council are considering adjacent to an oil depot near Wymondham, Norfolk that you had correspondence with my former colleague Tony Fielder (your ref: HSE Infoline enquiry reference HPHS-7KGE2K) regarding the consultation zones. We have now received correspondence on behalf of the site operator in which they suggest a 250m zone rather than 150m - I was wondering if you could confirm that the 150m is the appropriate requirement. A copy of the relevant part of their response is copied below for your information.

Regards

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Response from Stutt & Parker on behalf of GOFF Petroleum:  
The appraisal of site TG130008, west of the oil-storage terminal on Stanfield Road, included in appendix 6c of the withdrawn submission version of the document, excludes the site from consideration due to its remoteness from facilities which include public transport, and the risk to potential occupiers of the site due to its location within the safeguarding zone of the adjacent oil depot. This refers to saved policy UTL12 of the adopted local plan and proposal map 2003, which states that planning permission will not be granted for development on, or in the vicinity of hazardous installations including high pressure gas and oil pipelines and similar pipeline installations, as shown on the proposals map, unless the development would not give rise to additional public risk.

Within the short listing schedule of Appendix 5 of the current Regulation 25 consultation version of the Gypsy and Traveller DPD (shown below), the same site has the highest possible ranking on all 5 of the essential site selection criteria. These factors include; avoiding environmentally sensitive sites and avoiding flood zone and contaminated land. Our client's site includes significant levels of petroleum storage, and we understand from discussing the matter with officers at the exhibition that the HSE are content.

However, whilst we understand that the HSE have advised the Council that a distance of 150m is used from the site boundary as an acceptable distance. However, in formulating this policy, Atkins in a report advising the HSE on Land Use Planning and oil storage depots from 2007 pointed to the following:

Actual levels of harm at the Buncefield oil depot (explosion in December 2005, some 2000 people evacuated and significant damage occurring to both commercial and residential properties) led to proposed increases in Land Use Planning zones to up to 400m (HSE Research Report 511, 2006)

The maximum distance to the flammable cloud edge was approximately 250m

The vast majority (over 95%) of the societal risk would arise from the population within the 250m inner zone

Part of the concern of such a distance would be planning blight, and Atkins were asked

to consider a distance of 150m

Whilst accepting the reduction based on a range of factors, Atkins advised the HSE that

they would need to consider the risks of challenge, and of some authorities choosing not

to accept the distance.

We consider that a precautionary distance of 250m from site boundary should be used for

residential property, and that such a distance as highlighted on the attached plan, would not

permit the site identified. Indeed, notwithstanding the merits or risks of the distances involved, it does not represent good planning to site any residential use within such proximity to such a facility.

We would also stress that the site generates lorry movements close to the proposed site, using Stanfield Road which is a main HGV route to the A11. As such, the impact on residential

amenities of residents would be poor due to noise, fumes etc. To gain the highest score on

avoiding adverse impacts on the wellbeing of occupiers is therefore entirely unrealistic, clearly

does not take into account the appraisal of site TG130008 and policy UTL12 of the local plan,

and brings into question other assumptions on other categories.