

For the attention of: Hannah Terry
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Chemicals, Explosives and
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Date: 2nd October 2025

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References: CM9 Ref: 4.2.1.7385.
NSIP Ref:

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

Dear Hannah

**PROPOSED HEATHROW EXPANSION - EIA
PROPOSAL BY HEATHROW LTD
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017
(as amended) REGULATIONS 10 and 11**

Thank you for your letter of 3rd September 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

CEMHD5 Contribution to Consultation

HSE'S LAND-USE PLANNING ADVICE

HSE's role in NSIPs on land-use planning (for the planning system) is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" 'Annex G' on the Planning Inspectorate's website: [Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex G: The Health and Safety Executive - GOV.UK](#).

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed Development Consent Order ['DCO'] application boundary for this Nationally Significant Infrastructure Project is within the HSE consultation zones of eight (8no) major accident hazard sites ['MAHS'] and six (6no) major accident hazard pipelines ['MAHP']. This is based on the DCO limits shape files (*Heathrow_FS03_DraftOrderLimits2020.zip*) sent to HSE by the Applicant on 08/09/2025, which shows the EIA Scoping Addendum Draft Order Limits shown in Figure 2.1 of [EIA Scoping Report Figures 10000-XX-SY-XXX-100021](#).

The major accident hazard sites identified are:

- Calor Gas Ltd, Land at West London Industrial Park, Iver Lane, Uxbridge, UB8 2XS, HSE References: H0305 and H4639, HSA: London Borough of Hillingdon
- Aarque Systems Ltd, Blackthorne Road, Colmbrook, Slough, Berkshire, HSE Reference: H0364

- Esso Petroleum Co Ltd, West London Terminal, Bedfont Road, Stanwell, Staines, Middlesex, TW19 7LZ, HSE Reference: H0893, HSA: Slough Borough Council
- Transco Plc, Southhall Holder Station, White Street, Southhall, Middlesex, UB1 1QZ, HSE Reference: H1461, HSA: London Borough of Ealing and cross boundary with Hillingdon London Borough Council
- Every Ready Equipment Hire (Ever Ready Gas), Gallymead Road, Colnbrook, Slough, SL3 0NW, HSE Reference: H3093, HSA: Slough Borough Council
- Heathrow Hydrant Operating Co Ltd, B1204 Sandringham Road, Heathrow Airport, Hounslow, Middlesex, TW6 3SH, HSE Reference: H3791, HSA: London Borough of Hillingdon
- BAA Plc & Heathrow Airport Ltd, The former Perry Oaks Fuel Farm, Heathrow Airport, Hounslow, Middlesex, TW6 2PZ, HSE Reference: H4367, HSA: Hillingdon London Borough Council
- Thames Water Utilities Ltd, Maple Lodge Sewage Treatment Works, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ, HSE Reference: H4602, HSA: Three Rivers District Council

The Applicant should make contact with the above site operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. The Applicant should note that HSE consultation zones are associated with Hazardous Substances Consent ['HSC']. HSC is associated with the land and not the operator. The operators listed above are those who applied for the relevant HSC when HSE was consulted by the Hazardous Substances Authority ['HSA']. In cases where making contact with the holder of a HSC proves difficult, it is advised that the Applicant contacts the relevant HSA for the HSC. The HSA keep the authoritative records of HSC in their jurisdiction.

The major accident hazard pipelines are operated by Cadent Gas Ltd and are:

- Staines Bypass To Staines Moor; HSE ref. number 8003, Transco ref.: 2261.
- Fulmer To Southall; HSE ref. number 8005, Transco ref.: 2263.
- Fulmer To Staines Bypass; HSE ref. number 8014, Transco ref.: 2272.
- Staines Bypass To Laleham; HSE ref. number 8015, Transco ref.: 2273.
- Southall To Richmond; HSE ref. number 8021, Transco ref.: 2279.
- Harefield/Southall; HSE ref. number 4038916, Transco ref.: 2782.

The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii. The standards to which the pipeline is designed and operated may restrict 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.
- iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present and the development's type. HSE's methodology is given in [HSE: Land use planning - HSE's land use planning methodology](#). Paragraph 3.1.2 of the [EIA Scoping Report Addendum](#) document states: '*For the purposes of this EIA Scoping Addendum, no preferred masterplan has yet been fixed for the purposes of the DCO Application, and multiple design options remain under active consideration.*'. As it is currently unclear where people may be present and what the development types are planned across the application, HSE is not able to comment on its likely Land Use Planning based advice on the proposal. This will be important given that consultation zones for MAHSs and MAHPs were found intersecting the draft order limit shape files provided. With reference to the decision matrix in the methodology linked above, it is possible that for some combinations of proposed development type and HSE's consultation zone, that HSE may advise against. The developer may wish to make an enquiry themselves by using

the HSE planning advice web app, which can be found here: [HSE's Planning Advice Web App - Land Use Planning - HSE](#).

Would Hazardous Substance Consent be needed?

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an “addition rule” in Part 4 of Schedule 1 for below-threshold substances.

From the information provided in Section 15. Major Accidents and Disasters of the [EIA Scoping Report Addendum](#) document and the associated section of the 2018 EIA scoping document, numerous references have been made to the Control of Major Accident Hazards Regulations 2015 (commonly referred to as ‘COMAH’). A site to be operated within the scope of COMAH would most likely require HSC. Non-exhaustive examples of developments described within the NSIP application documents which could require HSC are:

- New aviation fuel storage facilities,
- New storage facilities for hydrogen, which may be planned as part of the ‘Jet Zero’ ambitions described,
- A new water treatment works, and
- A new energy from waste plant.

It is possible that these facilities may have hazardous substances present and it is possible that these facilities would require HSC. If HSC is required, the Applicant is advised to contact the Planning Inspectorate and relevant HSAs to discuss and agree on who will act as the authority and timings to obtain the required HSC(s). HSE will be required to be consulted by the acting authority to give its public safety advice and generate the consultation zones (only HSE can generate consultation zones, it cannot be delegated). HSE is advising applicants to allow up to 12 months to get HSE’s advice on the HSC applications: [Hazardous substances consent - HSE](#). If HSC is required, this may influence HSE’s advice on the proposal when considering HSE’s LUP methodology (described in the previous section) as new consultation zones may be introduced. HSE recommend that the NSIP applicant should expedite its applications for HSC, if needed. This is so that the application benefits from knowing the locations of all consultation zones early on, when citing populations.

Consideration of Risk Assessments

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development’s vulnerability to major accidents. HSE’s role in NSIPs is summarised in Advice Note 11 “working with public bodies in the infrastructure planning process” Annex G on the Planning Inspectorate’s website: [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). Annex G document includes consideration of risk assessments under the heading “Risk assessments”.

We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: *“it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.”*. Note that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority, to also be considered by HSE.

Explosives sites

CEMHD 7's response is:

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

**CEMHD4
NSIP Consultation Team**