

## HSE comments on responses to ExA's SWQ

HSE wishes to comment on the TfL response to SWQ HSS2.1 included in their 'Health, Safety and Security HSS Report' REP4-059 published 08/03/17, to clarify our position.

Using TFL's paragraph numbers:

HS2.1.2 – HSE would like to clarify that we saw no value in further discussion on the proposed two-limbed approach to a Grampian style requirement in advance of deadline 4. The respective positions of HSE and TfL were clear at this stage. However, HSE remains willing to continue with the discussion of the statement of common ground between HSE and TfL, particularly if the situation changes with respect to the hazardous substances consent for either Brenntag or the gasholder.

HS2.1.4 – HSE would like to explain that our safety advice in respect of the East Greenwich Gasholder Site is provided in accordance with government stated policy as contained in Planning Practice Guidance on hazardous substances paragraph 068 (...“advice to local planning authorities will take account of the maximum quantity of a substance permitted by a hazardous substances consent” ) This approach is justified by the information provided by SGN in their letter to HSE dated 18 January 2017 in which they clearly regard the gasholder site as an operational asset with hazardous substances consent. Under these circumstances HSE is providing advice in the context of the land uses permitted by the planning system rather than the current operational status of the gasholder site. [Paragraph 3.7 of our written representation \(REP1-080\)](#) refers.