



OUTLINE EMERGENCY PREPAREDNESS AND RESPONSE PLAN: 7.11

DECARBONISATION

Cory Decarbonisation Project

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1. INTRODUCTION

- 1.1.1. WSP has been instructed by Cory Environmental Holdings Limited (hereafter referred to as the Applicant) to prepare an **Outline Emergency Preparedness and Response Plan (Outline EPRP) (Document Reference 7.11)**, for the Cory Decarbonisation Project to be located at Norman Road, Belvedere in the London Borough of Bexley (LBB) (National Grid Reference/NGR 549572, 180512). The following figures are available in the Environmental Statement (ES):
- **Figure 1-1: Site Boundary Location Plan (Volume 2) of the Environmental Statement (ES) (Document Reference 6.2); and**
 - **Figure 1-2: Satellite Imagery of the Site Boundary Plan (Volume 2) of the ES (Document Reference 6.2).**
- 1.1.2. The Applicant intends to construct and operate the Proposed Scheme to be linked with the River Thames. It comprises of the following key components, which are described below, and further detail is provided within **Chapter 2: Site and Proposed Scheme Description (Volume 1)**:
- The Carbon Capture Facility (including its associated Supporting Plant and Ancillary Infrastructure): the construction of infrastructure to capture a minimum of 95% of carbon dioxide (CO₂) emissions from Riverside 1 and 95% of CO₂ emissions from Riverside 2 once operational, which is equivalent to approximately 1.3Mt CO₂ per year. The Carbon Capture Facility will be one of the largest carbon capture projects in the UK.
 - The Proposed Jetty: a new and dedicated export structure within the River Thames as required to export the CO₂ captured as part of the Carbon Capture Facility.
 - The Mitigation and Enhancement Area: land identified as part of the **Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy (Document Reference 7.9)** to provide improved access to open land, habitat mitigation, compensation and enhancement (including forming part of the drainage system and Biodiversity Net Gain delivery proposed for the Proposed Scheme) and planting. The Mitigation and Enhancement Area provides the opportunity to improve access to outdoor space and to extend the area managed as the Crossness Local Nature Reserve (LNR).
 - Temporary Construction Compounds: areas to be used during the construction phases for activities including, but not limited to office space, warehouses, workshops, open air storage and car parking, as shown on the **Works Plans (Document Reference 2.3)**. These include the core Temporary Construction Compound, the western Temporary Construction Compound and the Proposed Jetty Temporary Construction Compound.
 - Utilities Connections and Site Access Works: The undergrounding of utilities required for the Proposed Scheme in Norman Road and the creation of new, or the improvement of existing, access points to the Carbon Capture Facility from Norman Road.

- 1.1.3. Together, the Carbon Capture Facility (including its associated Supporting Plant and Ancillary Infrastructure), the Proposed Jetty, the Mitigation and Enhancement Area, the Temporary Construction Compounds and the Utilities Connections and Site Access Works are referred to as the 'Proposed Scheme'. The land upon which the Proposed Scheme is to be located is referred to as the 'Site' and the edge of this land referred to as the 'Site Boundary'. The Site Boundary represents the Order Limits for the Proposed Scheme as shown on the **Works Plans (Document Reference 2.3)**.

1.2. PURPOSE OF REPORT

- 1.2.1. This document provides the outline contingency plans in the event that an emergency event occurs onsite (including within the River Thames). This document also details a series of emergency procedures that will form part of a comprehensive training package for operational staff. Training is scheduled to begin around six months prior to operation commencing, ensuring thorough preparation in emergency preparedness and response.
- 1.2.2. This document is developed in line with the Riverside Campus's emergency management strategy. It is designed to complement the emergency plans and procedures of Riverside 1 and Riverside 2 (once operational).
- 1.2.3. The chapters in this document have been informed by key regulatory requirements and incorporate principles from essential guidance documents, including:
- Emergency Preparedness: Chapter 5 of Civil Contingencies Act Enhancement Programme¹;
 - Environmental Agency Guidance Note - Fire prevention plans: environmental permits²; and
 - Environment Agency Guidance Note – Prepare your business for flooding³.
- 1.2.4. A full EPRP will be prepared prior to the commencement of commissioning in substantial accordance with this document, to be secured through a requirement in the DCO.

1.3. SUPPORTING PLANS

- 1.3.1. The **Works Plans (Document Reference 2.3)** are relevant for this document, which shows where the elements of the Proposed Scheme are likely to be located.
- 1.3.2. Sensitive receptors located within the vicinity of the Site are shown on **Environmental Features Plans (Document Reference 2.7)**, in addition local facilities are shown on **Figure 18-5: Local Facilities (Volume 2)** of the **ES (Document Reference 6.1)**.
- 1.3.3. Additional plans will be prepared alongside the detailed design of the Proposed Scheme which will be included in the full EPRP as required.

1.4. OUTLINE EPRP STRUCTURE

- 1.4.1. This document serves as the initial framework for managing potential emergencies during the operation phase of the Proposed Scheme.
- 1.4.2. This document includes the procedures, actions and measures associated with the Proposed Scheme that would be undertaken to prepare for and respond to:
 - a flood event;
 - a fire/explosion/hazardous gas incident;
 - a contamination or pollution event; and
 - a terrorism or other substantial threat to security (TOSTS) incident.
- 1.4.3. This document is intended to be dynamic and responsive, designed to be updated and expanded as new information arises, throughout the design and construction phases. This document is structured with the foresight to accommodate evolving project needs and to ensure comprehensive emergency management strategies are in place.
- 1.4.4. Below is an overview of the Outline EPRP's structure:
 - **Chapter 1 Introduction:** Provides background information on the Proposed Scheme, defines the scope and objectives of this document, details supporting plans, and introduces the overall structure of the document.
 - **Chapter 2 Emergency Preparedness:** Describes the access protocols, staff training requirements, the process of engagement with emergency services, and the overarching emergency management system. This section also addresses specific procedures for managing harmful liquid release and spillages, emergency resources and delineates the roles and responsibilities of designated roles responsible for responding to emergencies.
 - **Chapter 3 Roles and Responsibilities:** Describes the personnel that are relevant to this document and their responsibilities.
 - **Chapter 4 Initial Emergency Actions:** Specifies the immediate steps to be taken by the Incident Controller and staff in the event of an emergency to safeguard personnel and minimise damage to the facility.
 - **Chapter 4 Fire/Explosion/Hazardous Gas Incident:** Assesses the risks associated with fire, explosions, and hazardous gas incidents, and details prevention, mitigation, containment, and emergency response strategies tailored to these specific threats.
 - **Chapter 5 Flood Emergency:** Describes the flood preparation, planning, and response measures to be activated in the event of a flood emergency.
 - **Chapter 6 Terrorism or Other Substantial Threat to Security:** Addresses protocols for responding to terrorist actions or threats, and procedures for managing the presence of intruders onsite to ensure the security of the facility.

- **Chapter 7: Emergency Recovery and Review:** Describes the transition from emergency response to recovery, regulatory reporting and media communication, incident reporting and emergency incident review and debrief.
- **Chapter 8 Consultation:** Defines the consultation process with relevant stakeholders, including local authorities and emergency services, to ensure coordinated response efforts.
- **Chapter 9 Plan Revision and Administration:** Concludes this document with a summary of responsibilities, outlines the process for ongoing plan ownership and updates.
- **Chapter 10 References.**

2. EMERGENCY PREPAREDNESS

2.1. ACCESS TO THE EMERGENCY PREPAREDNESS AND RESPONSE PLAN

2.1.1. As part of the full EPRP the following documentation and processes will be maintained and be made readily accessible to ensure swift and effective response in case of emergencies:

- Health and safety documentation related to chemicals.
- Manufacturer instructions and information for emergency and other equipment essential for implementing emergency preparedness and response.
- Emergency plans and procedures of the other Riverside Campus facilities, ensuring a consistent implementation framework and coherent communication across all facilities.
- Site layout plans indicating the location of hazardous areas.

2.1.2. It is proposed that the documentation and processes will be readily available to all operational staff in the Control Room and Gatehouse (as shown on the **Works Plans (Document Reference 2.3)**). The full EPRP will be an integral component of the Applicant's wider management system for the Proposed Scheme.

2.2. STAFF TRAINING AND SITE INDUCTION

2.2.1. Staff induction programmes will be tailored to specific job roles and locations, encompassing training on the Proposed Scheme's management system procedures, including emergency and response procedures.

2.2.2. All personnel, including operational staff, visitors, and any Contractor(s), will receive comprehensive information and training on emergency and response procedures as part of Site induction.

2.3. ENGAGEMENT WITH EMERGENCY SERVICES

2.3.1. Critical information, including the full EPRP, key contact numbers, and details on emergency control features (e.g. the location of shut-off valves, hydrants), will be shared with local emergency services.

2.4. EMERGENCY MANAGEMENT SYSTEM

2.4.1. A robust emergency management system will be developed, focusing on risks specific to the Proposed Scheme, such as CO₂ and LCO₂ handling and storage.

2.4.2. The system will feature detailed emergency procedures, risk assessments, and response strategies tailored to address potential scenarios applicable to the Proposed Scheme operations.

2.5. HAZARDOUS MATERIALS MANAGEMENT

RISK ASSESSMENT AND MITIGATION

- 2.5.1. The Proposed Scheme acknowledges the risk of hazardous waste release into the environment, with particular emphasis on preventing contamination of marine ecosystems.
- 2.5.2. Robust measures will be implemented to mitigate the risk of environmental contamination, including but not limited to marine environments.
- 2.5.3. The assessment of the water environment and risks is presented in **Chapter 11: Water Environment and Flood Risk (Volume 1)** of the **Environmental Statement (Document Reference 6.1)**.

WASTE MANAGEMENT MEASURES

- 2.5.4. A comprehensive waste management strategy will be developed for the Site, aiming to minimise waste generation, optimise onsite waste storage, and facilitate efficient transfer to offsite specialised treatment facilities.
- 2.5.5. Detailed descriptions of these measures are provided in **Chapter 4**, addressing fire, explosion, and hazardous gas scenarios. These measures are designed not only to mitigate incidents but also to significantly reduce the risk of hazardous waste release during emergencies, including flood events.

WATER QUALITY AND CONTAINMENT RELEASE PREVENTION STRATEGIES

Spill/Leak Management

- 2.5.6. Procedures will be established to promptly address spills and leaks of chemicals, including measures to prevent leakage from Site vehicles and vessels. This protocol will encompass immediate response actions and long term mitigation strategies. Specific consideration will be given to potential contamination events in the River Thames during the operation phase, building on the commitments already set out in the **Outline Drainage Strategy (Document Reference 7.2)**.
- 2.5.7. Refuelling and maintenance for vessels and Site machinery will be confined to designated areas with impermeable surfaces and advanced drainage systems, designed to prevent any chemical runoff into the River Thames.
- 2.5.8. Drip trays will be strategically placed under leak-prone equipment like generators and diesel pumps, with spill kits available across the Site and on vessels, ensuring rapid response capabilities for spill incidents.
- 2.5.9. Hydrocarbon interceptors are installed in high-risk areas, such as parking, unloading, and refuelling zones, to filter out oils from surface runoff out before it can enter the River Thames.

- 2.5.10. To further mitigate the risk of accidental fuel leaks, a stringent schedule of regular inspections and maintenance for vessels will be implemented. The focus will be on fuel systems and storage areas to ensure integrity and leak prevention.
- 2.5.11. All vessels will be required to have in place comprehensive fuel leak contingency plans. These plans must detail immediate response actions, such as the deployment of booms and absorbents, to contain and remediate any accidental fuel leaks, minimising the impact on the river's ecosystem. This shall be in addition to the requirements set forth by the Port of London Authority and the Maritime Coastguard Agency.

Chemical Risk Assessments

- 2.5.12. COSHH (Control of Substances Hazardous to Health) sheets will be systematically maintained and stored in locations where the materials or substances are stored, handled, or distributed, ensuring any person exposed to the hazardous substance can quickly and easy access the vital safety information. Additional measures such as training and work procedures will be developed prior to the operation phase, to ensure hazardous substances are adequately controlled in compliance with the COSHH Regulations 2002⁴.

Site Infrastructure, Drainage and Bunding

- 2.5.13. The **Outline Drainage Strategy (Document Reference 7.2)**, part of the DCO application, sets out the proposals for the construction of new drainage networks and essential services, aligning with environmental and regulatory requirements. This strategy is integral to the Proposed Scheme's commitment to preventing release of chemicals into the marine environment. Areas with the highest risk of pollution to the environment will be contained by means of bunding in accordance with the Guidance for Pollution Prevention (GPP)⁵ documents (where the surface water within these areas is only released to the environment once testing has proved it is not significantly polluted). An isolation system (with monitoring) would be applied to all attenuation tanks preventing any inappropriate discharge into the surface water drainage network.
- 2.5.14. As part of the detailed design a full Drainage Strategy, will be developed in accordance with the **Outline Drainage Strategy (Document Reference 7.2)** and the **Appendix 11-2: Flood Risk Assessment (Volume 3)** of the **ES (Document Reference 6.3)**, to ensure that the proposed surface water drainage system is not affected by fluvial flooding and that it is designed to work independently from the fluvial flood compensation storage areas that are developed.

2.6. SITE SECURITY

PREVENTING ARSON OR VANDALISM

- 2.6.1. An **Outline Lighting Strategy (Document Reference 7.3)** has been submitted as part of the DCO application. This Strategy aligns with relevant legislative and guidance requirements, aiming to balance minimisation of light intrusion, sky glow,

and glare, while enhancing security measures against potential arson attacks or vandalism.

- 2.6.2. In addition to the full Lighting Strategy, the Proposed Scheme will implement security measures such as closed-circuit television (CCTV) systems and secure fencing.

2.7. EMERGENCY RESPONSE TEAM

ERT STRUCTURE AND ALIGNMENT

- 2.7.1. The Emergency Response Team (ERT) structure outlined in this section is based on the Riverside 1 Emergency Preparedness and Response Procedure⁶, ensuring consistent emergency management across facilities.
- 2.7.2. The Proposed Scheme's ERT is anticipated to mirror Riverside 1's organisational framework, with the same roles and titles in the ERT.
- 2.7.3. The names and contact details of personnel appointed to designated roles within the ERT will be included in the full EPRP.
- 2.7.4. Comprehensive responsibilities and specific duties of the ERT will be thoroughly outlined in the full EPRP, tailored to the risks and emergency protocols of the Proposed Scheme.
- 2.7.5. Additional duties of the ERT, especially those pertinent to distinct emergency incidents such as fires, will be detailed in respective emergency documentation developed by the Applicant, including a Fire Evacuation Plan.

3. ROLES AND RESPONSIBILITIES

PLANT MANAGER

- 3.1.1. This role is central to the control and management of the entire Site, including the ultimate authority and oversight of the implementation of the final and approved full EPRP and related procedures when the Proposed Scheme is operational.

DEPUTY MANAGER

- 3.1.2. In the event the Plant Manager is unavailable, responsibility will pass to the Operations Manager. If the Operations Manager is also absent, the Engineering or Maintenance Manager will step in as Deputy Manager.
- 3.1.3. The Deputy Manager, when acting in place of the Plant Manager, will be responsible for the overall control and management of the site, including implementing emergency response procedures.
- 3.1.4. Additionally, the Deputy Manager will be tasked with organising, recording, and evaluating training drills and sessions to effectively prepare for and manage foreseeable emergency incidents.

INCIDENT CONTROLLER

- 3.1.5. Typically, an appointment and experienced Shift Team Leader, this person coordinates the actions of personnel during an incident. Their focus includes:
- ensuring the safety of operational staff;
 - minimising environmental pollution release; and
 - maintaining plant safety within the Site.

OTHER SHIFT TEAM LEADERS

- 3.1.6. Other Shift Team Leaders play a crucial role in maintaining effective communication, especially with staff engaged in lone working, and in supporting the Incident Controller during emergencies. Their responsibilities include:
- assisting in the implementation of emergency procedures; and
 - reporting and managing incident responses in the Control Room.

FIRE SAFETY MANAGER

- 3.1.7. The Fire Safety Manager is responsible specifically on fire risks and preventing fire occurrences and maintaining a fire-safe environment. This role involves regularly reviewing fire safety measures and fire response procedures, which will be set out in a Fire Strategy (or equivalent).

PROCESS ENGINEER

- 3.1.8. A designated individual knowledgeable in COSHH and other health, safety, and environmental matters. They assist in determining responses to hazardous material incidents, including fire, explosion, chemical, biological, or radiological events.

SHIFT OPERATIONS STAFF

- 3.1.9. Shift operations staff are responsible for immediate reporting of potential emergency situations to the Control Room. Operations staff shall play key role in initiating the emergency response.

ALL STAFF (EMPLOYEES AND CONTRACT STAFF)

- 3.1.10. It is the duty of every individual working at the Proposed Scheme to report incidents that could lead to an emergency to the Control Room.

4. INITIAL EMERGENCY ACTIONS

4.1. INITIAL RESPONSE COORDINATION

- 4.1.1. **Evacuation Strategy Determination:** In the event of an emergency, the Incident Controller will promptly establish the safest and most effective evacuation strategy, taking into account the specific nature of the emergency, the hazard's location, staff distribution, and the accessibility of escape routes and muster points. The strategy, including designated evacuation paths and assembly areas, will be rapidly communicated to all Site personnel through established communication channels.
- 4.1.2. **Guidance Documents:** The Incident Controller will use developed 'Incident Control Action Sheets' as primary guides for various emergency scenarios specific to the Proposed Scheme. These Action Sheets will offer step-by-step response procedures tailored to the unique risks associated with the facility. Their format and design will align with the existing documents employed at Riverside 1.
- 4.1.3. **Visibility and Accessibility:** To ensure easy identification, the Incident Controller will wear a marked high-visibility vest and stay accessible for emergency services.
- 4.1.4. **Emergency Services Communication:** Sole authority to contact emergency services is vested in the Incident Controller to prevent call duplication.
- 4.1.5. **Alarm Response:** Upon fire alarm activation, the Incident Controller ensures prompt opening of all vehicle gates.
- 4.1.6. **Inter-Facility Coordination:** Coordination with Riverside 1 and 2 regarding any evacuation or impact is managed by the Incident Controller.
- 4.1.7. **Handling False Alarms:** The Incident Controller is responsible for managing false alarm procedures and ensuring completion of evacuation protocols.
- 4.1.8. **Damage Containment:** Actions to minimise damage to infrastructure, equipment and then environment are undertaken, adhering to operational procedures and strict PPE usage.
- 4.1.9. **Decision-making Communication:** The Plant Manager or nominated deputy is informed for decision-making and crisis communication.
- 4.1.10. **Incident Recording:** Detailed recording of each incident is a responsibility of the Incident Controller.

4.2. ALL STAFF AND VISITOR ACTIONS

- 4.2.1. **Evacuation Procedure:** In the case of an emergency, all staff members, encompassing administrative, maintenance, and other personnel, must promptly evacuate using the nearest emergency exit and proceed directly to the assigned muster point. All staff must adhere to the directives issued by the Incident Controller through the designated communication channels.

- 4.2.2. **Visitor Safety:** Visitors will be escorted to the exit and muster point by their sponsors or guides.
- 4.2.3. **Alternative Safety Measures:** In specific emergencies (e.g. chemical spillage), alternative safety measures like sheltering in place may be implemented.

5. FIRE/EXPLOSION/HAZARDOUS GAS INCIDENT

5.1. FIRE/EXPLOSION/HAZARDOUS GAS INCIDENT RISK ASSESSMENT

- 5.1.1. The assessment of fire and explosion risks is presented in **Chapter 20: Major Accident and Disaster (Volume 1)** of the **Environmental Statement (Document Reference 6.1)**.
- 5.1.2. Key fire and explosion risks for the Proposed Scheme are associated with the CO₂ processes and infrastructure. These include:
- handling and storage of amine-based solvents and CO₂ processes;
 - risks of unconfined vapor explosions leading to structural damage and potential injuries;
 - potential for significant environmental damage from major fires, driven by airborne combustion products; and
 - large-scale releases of CO₂ from various sources, posing toxicity and fogging hazards in adjacent areas and public spaces.

5.2. PREVENTION AND MITIGATION FOR FIRE/EXPLOSION/HAZARDOUS GAS INCIDENTS

MANAGING COMMON CAUSES OF FIRES

Heat and Spark Prevention Design

- 5.2.1. A comprehensive review in line with the Dangerous Substances and Explosive Atmospheres Regulations⁷ would be completed during the detailed design phase of the Proposed Scheme and documented in a Major Accident Prevention Plan (or equivalent). This review will identify potential risk areas, which will be clearly marked on plans that will be included in the full EPRP.

Operational Procedures

- 5.2.2. The operational procedures, including maintenance, will be set out in an Operational Environmental Management Plan (Operational EMP), which will be prepared prior to the Proposed Scheme commencing operation in accordance with the measures set out in the **Mitigation Schedule (Document Reference 7.8)**, as required by the **Draft DCO (Document Reference 3.1)**.
- 5.2.3. The development of the Operational EMP will include a Fire Strategy (or equivalent) for the risk of fire, and appropriate measures to reduce the risk of fire throughout the Proposed Scheme.
- 5.2.4. Maintenance procedures will include defined responsibilities for maintaining records of all maintenance activities and any actions taken in response to issues encountered.

Site Inspections and Maintenance Checks

- 5.2.5. Regular inspections will be performed covering all operational areas as part of the standard operating procedures. Inspection records will be kept in the Control Room, with a minimum requirement of inspection main operational areas each operating shift and issuing maintenance work instructions for any concerns identified.

Ignition Sources

- 5.2.6. Regular safety inspections will be conducted on vehicles and electrical equipment to identify and rectify any electrical faults. Fire extinguishers and dust filters will be standard equipment on all mobile plant to enhance fire safety measures.

Hot Exhausts and Engine Parts

- 5.2.7. Staff will be trained to inspect plant and machinery for potential fire hazards, such as the accumulation of dust on hot engine parts, with a particular focus on exhausts.
- 5.2.8. Plant and equipment will be checked for cleanliness and proper functioning at the start and end of each shift to mitigate the risk of fire (as set out in a Fire Safety Management Plan (or equivalent)).

No Smoking Policy

- 5.2.9. A no smoking policy would be adopted and implemented throughout the Proposed Scheme.

Electrical Safety and Maintenance

Electrical Safety and Compliance

- 5.2.10. All electrical systems will be designed, installed, and maintained in accordance with the relevant British Standards to mitigate risks of electrical faults. Only certified electricians will be involved in these processes, incorporating additional safety measures such as supplementary bonding/earthing where necessary.

Certification and Oversight of Electrical Installations

- 5.2.11. Professional certification of all electrical installations will be ensured by qualified individuals or bodies, confirming compliance with safety and operational standards.

Preventative Maintenance and Equipment Checks

- 5.2.12. A comprehensive maintenance and testing program will be implemented for all electrical equipment, including routine inspections and Portable Appliance Testing, to prevent electrical faults and reduce fire risks.

Gas Bottles and Other Flammable Item Storage

- 5.2.13. Any gas cylinders will be stored in facilities specifically designed for the inventory, incorporating appropriate separation distances from other stored materials and process plant, traffic routes and occupied buildings, and adequate ventilation and impervious surfaces, as per regulatory requirements. All facilities for the storage of gas cylinders would be kept locked/secured. The location of gas cylinder storage and other flammable items would be subject to detailed design. A plan showing the location of gas storage facilities would be included in the full EPRP.

- 5.2.14. A system for the regular inspection of gas storage facilities would be developed as part of the operating and maintenance procedures and the Site inspection regime.

WASTE AND FACILITY MANAGEMENT

- 5.2.15. A key development of the Proposed Scheme will be robust and integrated waste disposal and housekeeping strategies to minimise fire risks. The strategies are designed to ensure efficient management of operational waste, aligning with environmental requirements, while proactively addressing fire hazards associated with waste accumulation and treatment at the Site.

Hot and Dry Weather Monitoring

- 5.2.16. In response to increased fire risks during hot weather, all loose waste will be securely stored within the main building to prevent overheating. Additional inspections and monitoring will be implemented during these periods to ensure safety.

Operational Waste Generation and Management

- 5.2.17. The Proposed Scheme will produce operational waste, including amine-based solvents, desiccants, recyclable materials, and general waste, with management practices designed to have minimal impact on local waste infrastructure.
- 5.2.18. The waste production is projected to minimally impact local waste systems, with ongoing monitoring and adaptive management as key operational practices.
- 5.2.19. Waste management strategies will adhere to the Waste Hierarchy where practicable and follow any protocol set out in the Operational EMP.

Sustainable Waste Practices

- 5.2.20. Sustainable practices will be adopted, including maximising recycled content in procurement and minimising surplus, to reduce waste-associated fire risks. Supplier takeback schemes will be promoted.

Waste Recovery and Disposal

- 5.2.21. Most waste, including dredged arisings, will be treated offsite for reuse, reducing on-site fire risk from waste accumulation.
- 5.2.22. Hazardous waste such as amine-loaded sludge will be handled with specialised procedures to ensure safe transport to designated treatment facilities, mitigating fire and environmental risks.

Wastewater Treatment and Carbon Capture Facility Management

- 5.2.23. Wastewater treatment processes will involve neutralisation and recycling methods, including the handling of amine wastewater effluent.
- 5.2.24. The Carbon Capture Facility will manage small volumes of amine-loaded sludge, with temporary onsite storage and subsequent environmentally compliant offsite disposal.
- 5.2.25. Infrastructure development will include new connections to existing sewage systems, ensuring environmentally compliant wastewater disposal.

Waste Monitoring

- 5.2.26. Regular monitoring of operational waste tonnages will inform strategies for waste reduction and fire risk minimisation.
- 5.2.27. A comprehensive waste management plan will address all aspects of waste handling, including reuse, recycling, disposal, and associated fire risks.

Preventing Build-Up of Loose Combustible Waste, Dust and Fluff

- 5.2.28. The design of the Proposed Scheme's Carbon Capture and CO₂ Processing Plants will incorporate systems to minimise dust accumulation, focusing on areas like the Flue Gas Pre-Treatment area, Absorber Column(s), Solvent Regeneration System, and CO₂ Vents.
- 5.2.29. Measures such as enclosed processing areas with air extraction and filtration systems, will be implemented to control dust and fluff, particularly in the Solvent Storage and LCO₂ Buffer Storage Area.
- 5.2.30. Regular maintenance checks, as outlined in the operating manuals, will ensure the efficiency of dust control systems.
- 5.2.31. Routine inspections will be conducted across the Carbon Capture Facility. Any identified build-up of combustible waste, dust, or fluff will be promptly addressed through cleaning, particularly around hot surfaces and in areas prone to dust accumulation.

DETECTION SYSTEMS

- 5.2.32. The specific fire detection systems, including smoke, heat, flame, and gas detectors (CO₂), will be selected during the detailed design phase of the Proposed Scheme and documented in a Major Accident Prevention Plan (or equivalent). These systems will align with the diverse requirements of different areas within the facility, ensuring comprehensive coverage and quick response capabilities.
- 5.2.33. All fire detection systems will adhere to stringent certification standards, overseen by UKAS-accredited third party certification scheme⁸, ensuring their reliability and effectiveness in detecting potential fire emergencies.
- 5.2.34. The Carbon Capture Facility will incorporate an automatic fire/gas detection system, segmented into zones for precise location identification. Each zone will have dedicated circuits for detectors and manual call points, connected to a central control panel, likely in the Control Room.
- 5.2.35. Regular maintenance and testing of these systems will be conducted in compliance with relevant British Standards, such as BS 5839-1:2017⁹.
- 5.2.36. Fire/gas detection arrangements will be formulated in consultation with fire risk insurers and the local fire service, ensuring that the systems meet or exceed all required safety standards.

- 5.2.37. A plan showing the chosen fire detection systems for the different areas of the Proposed Scheme, depending on the suitability of each detection type for each process area, would be included in the full EPRP.

5.3. CONTAINMENT OF FIRE, EXPLOSIONS AND HAZARDOUS GAS

Separation Distances

Plant and Equipment

- 5.3.1. There will be adequate spacing between buildings and storage areas to prevent fire spreading.
- 5.3.2. Any waste will be stored with a separation distance of at least 6m away from any plant and equipment that could act as a potential ignition source.
- 5.3.3. Incompatible substances will be stored separately to prevent accidental fires or explosions due to chemical interactions.
- 5.3.4. Additionally, buffer zones will be established around critical infrastructures such as gas storage and electrical units, to further reduce the risk of fire escalation (as set out in a Fire Safety Management Plan (or equivalent)).

Public Rights of Way

- 5.3.5. A Quantitate Risk Assessment (QRA) was undertaken as part of the design development of the Proposed Scheme to ascertain the potential risk to members of the public as a result of locating the current proposed volumes of LCO₂ (within the Carbon Capture Facility).
- 5.3.6. The QRA established that Work No 1C on the **Works Plans (Document Reference 2.3)** is the best location for the proposed LCO₂ Buffer Storage Area, given the nearby sensitive receptors (inclusive of both Applicant and third parties) such that all risks are reduced to ALARP. Appropriate clearance will be created between the Public Right of Way FP2 and the LCO₂ Buffer Storage Area through the footpath diversion proposed as part of the **Draft DCO (Document Reference 3.1)**. The diversion route will be agreed with LBB, accounting for the need to address these safety concerns and meet the management prescriptions set out in the **Outline LaBARDS (Document Reference 7.9)**.

FIRE WALLS, WINDOWS AND BARRIERS

- 5.3.7. Fire-rated doors, barriers, and windows will be integral to the facility's design, and installed in accordance with Building Regulations (Approved Document B on Fire Safety). These fire-resistant features will be strategically placed to contain fires within designated compartments, thereby preventing spread across the facility.
- 5.3.8. The specifications of fire walls, doors, windows, and related materials will be determined during the detailed design phase and documented in a Major Accident Prevention Plan (or equivalent). This process will involve assessments of material suitability and risk evaluations specific to each area of the Proposed Scheme, ensuring optimal fire protection and containment.

EMERGENCY VENTILATION SHUTDOWN

- 5.3.9. Automated systems will be in place for immediate ventilation shutdown in case of fire or inadvertent gas release, aiding in the containment of fire, smoke, or harmful gases.
- 5.3.10. Critical areas like control rooms will be equipped with positive air pressure systems, designed to prevent the entry of smoke or toxic gases.

5.4. EMERGENCY RESPONSE FOR FIRE, EXPLOSIONS AND HAZARDOUS GAS INCIDENTS

FIREFIGHTING TECHNIQUES

- 5.4.1. The Proposed Scheme will incorporate a range of firefighting techniques to effectively control and extinguish fires.
- 5.4.2. The selection of specific firefighting methods, including early detection systems, automatic sprinklers, manual deluge systems, and fire cannons, will be finalised during the detailed design phase and documented in a Major Accident Prevention Plan (or equivalent).
- 5.4.3. The final selection and detailed specifications of these systems will be presented in the full EPRP, ensuring a clear and actionable framework is set out for the operation phase.
- 5.4.4. An active firefighting strategy will be in place, prioritising safety and minimising risks. The strategy will involve immediate engagement in fire suppression activities upon detection.

Firefighting Resources and Equipment

- 5.4.5. Key firefighting resources to be provided include:
 - mobile plant equipment, designated for moving waste and managing Site conditions during a fire;
 - fixed firewater hose reels and manual alarm activation points, accessible to trained Site operatives;
 - a consistent and reliable water supply dedicated to firefighting needs; and
 - adequate financial backing to support the infrastructure necessary for effective firefighting and emergency response.

Manual Fire Suppression

- 5.4.6. Portable fire extinguishers, tested and inspected regularly, will be accessible throughout the Proposed Scheme.
- 5.4.7. Hose reels connected to a fire hydrant system, including dry risers, will be strategically placed, particularly near higher-risk areas such as waste storage.

- 5.4.8. The exact locations of fire extinguishers and hose reels will be determined based on risk assessments during detailed design, in consultation with insurers and the local fire service.

Automatic Fire Suppression

- 5.4.9. During the detailed design phase of the Proposed Scheme, an automatic fire suppression system will be specified, with decisions made in consultation with fire safety experts, insurance advisors, and relevant authorities to ensure the most effective and compliant solution. The final specifications will be detailed and finalised for inclusion in the full EPRP.
- 5.4.10. The system will be customised for high-risk areas such as the Carbon Capture Facility, with a focus on addressing the specific fire hazards present in chemical processing and storage areas.
- 5.4.11. The system will integrate quick-response features with the fire alarm system, ensuring immediate activation and coordinated response during fire incidents. Details of the system's operation and response protocols will be finalised and presented in the full EPRP.

Contingency

- 5.4.12. If the Carbon Capture Facility is not able to undertake the carbon capture process due to an unplanned incident forcing a full shutdown, the flue gas would be diverted to Riverside 1 and Riverside 2 for emission through the existing stacks.
- 5.4.13. If there was a significant fire requiring a full shut-down of the Carbon Capture Facility, the facility would not restart operations until the relevant regulatory authorities (Fire Service, Health and Safety Executive, Environment Agency, etc.) as well as the fire insurers, advised that it was safe to do so.

FIRE EVACUATION PLAN

- 5.4.14. A detailed Fire Evacuation Plan will be developed for the Proposed Scheme before the completion of the construction phase. This plan will be based on a comprehensive Fire Risk Assessment of the Site, aligned with the full EPRP and tailored to address specific risks associated with fire, explosion, and hazardous gas release.
- 5.4.15. The development process will involve consultations with fire safety specialists, ensuring that the plan meets applicable regulatory and industry standards and is effective in managing fire-related emergencies.
- 5.4.16. The Fire Evacuation Plan for the Proposed Scheme will be developed based on the Fire Risk Assessment, with evacuation routes and muster points strategically chosen based on fire/explosion/hazardous gas release risks and impacts throughout the Site.
- 5.4.17. Multiple muster points will be established with alternative options to accommodate different emergency situations. These points will be strategically chosen based on risk assessments of potential fire impacts.

- 5.4.18. Designated fire wardens within the ERT will be responsible for guiding personnel during evacuations and ensuring all staff are accounted for at muster points.
- 5.4.19. The plan will include regular training and drills to ensure all personnel are familiar with the fire evacuation procedures and the use of fire-fighting equipment.
- 5.4.20. The Fire Evacuation Plan will be continuously reviewed and updated to reflect any changes in the facility's layout, processes, or risk profile, maintaining its effectiveness and relevance.

6. FLOOD EMERGENCY

6.1. FLOOD PREPARATION AND PLANNING

FLOOD RISK ASSESSMENT

- 6.1.1. Due to the location of the Proposed Scheme flood-related risk events have been identified. Further detail is provided in **Appendix 11-2: Flood Risk Assessment (Volume 3)** of the **Environmental Statement (Document Reference 6.1)**. The assessment of risks relating to flooding is presented in **Chapter 20: Major Accident and Disaster (Volume 1)** of the **Environmental Statement (Document Reference 6.1)**.

FLOOD WARNINGS

Flood Trigger Levels

- 6.1.2. Three trigger levels shall be established for a potential flood event at the Site. These levels are consistent with the Environment Agency's alert system guidelines¹⁰ The three trigger levels, each indicating increasing severity and requiring specific responses, are detailed below:

1.  **Flood alert (*Prepare*)** – Be prepared.
2.  **Flood warning (*Act*)** – Immediate action required.
3.  **Severe flood warning (*Survive*)**

Flood Warning and Response Assessment

- 6.1.3. The Environment Agency will issue flood warnings with lead times tailored to the Site's location, based on the most current hydrological data and predictive models.
- 6.1.4. As the Proposed Scheme becomes operational, these lead time estimations will be refined and provided in real-time with flood warning notifications.

Flood Forecasting

- 6.1.5. The Proposed Scheme will have systems in place to receive and act upon these warnings promptly, ensuring maximum preparedness for any flood events.
- 6.1.6. The Proposed Scheme will register online¹¹ with the Environment Agency to receive flood warnings for the Site, ensuring prompt alerts through phone, email, or text when flooding is anticipated.
- 6.1.7. A designated member of the ERT will be on-call at all times, responsible for carrying the Emergency Phone and acting as the primary recipient for flood warnings issued by the Environment Agency.

Environmental Management System and Emergency Planning

- 6.1.8. The Environmental Management System will integrate key elements of flood preparedness. Regular briefings for the Emergency Response Team will ensure readiness for flood events.

Stakeholder Communication and Coordination

- 6.1.9. A register of key stakeholders, including nearby facilities like the Great Breach Pumping Station, will be maintained for effective communication and collaboration during flood events.

Liaison with Local Authorities and Emergency Services

- 6.1.10. Effective communication and coordination with local authorities and emergency services will be detailed in the full EPRP.
- 6.1.11. Emergency contacts for the Proposed Scheme will be displayed in prominent locations at Proposed Scheme.
- 6.1.12. Protocols, extending from the existing systems at the Riverside Campus, will be established for sharing information, resources, and support with these entities. This collaboration shall ensure a unified response to flood events, leveraging the expertise and resources of multiple agencies for an efficient and effective response.

Evacuation Procedures and Routes

- 6.1.13. Evacuation procedures and routes for the Proposed Scheme will be developed based on the layout of the Site and its proximity to flood risk areas. These procedures will include designated evacuation routes, safe assembly points, and protocols for a safe and orderly evacuation.
- 6.1.14. Clear signage and access to evacuation maps will be maintained at all times, and evacuation routes will be kept unobstructed to facilitate quick egress in the event of a flood.

Training and Drills

- 6.1.15. Flood response training and emergency procedures will extend from the existing protocols at the Riverside 1 and Riverside 2, ensuring consistency and effectiveness across all operations at the Riverside Campus.
- 6.1.16. Regular drills will simulate various flood scenarios, ensuring that evacuation procedures and flood response actions are effective.

Safe Refuge

- 6.1.17. The Proposed Scheme will include designated safe refuge areas that are strategically located at higher elevations within the Site or at secured offsite locations. The full EPRP will detail these locations, along with information on signage, evacuation plans, and other relevant safety measures to ensure that all personnel are well-informed and prepared for emergency situations, with clear guidance on accessing safe refuge.

- 6.1.18. These areas will be equipped with necessary supplies, emergency kits, and communication tools to ensure the safety and wellbeing of all personnel during a flood event.
- 6.1.19. The safe refuge areas will be evaluated for their accessibility and capacity to accommodate all personnel, with considerations for any necessary special accommodations. Regular assessments will be conducted to ensure these refuges remain suitable and well-equipped for emergency situations.

Drainage and Pollution Control

- 6.1.20. The operational Site will implement a comprehensive surface water drainage system, specifically designed to manage runoff efficiently and mitigate flood risks. This system is aligned with the strategic approach to handle the increased rainfall intensity and the potential rise in water levels associated with the River Thames, ensuring resilience against climate change impacts. The comprehensive surface water drainage system will be developed in accordance with the **Outline Drainage Strategy (Document Reference 7.2)**.
- 6.1.21. To safeguard the River Thames and adjacent watercourses from contamination, silt control measures will be rigorously applied, especially during periods of heavy rainfall. These measures are essential to prevent sediment and other contaminants from entering the Thames, thus protecting its water quality and biodiversity.
- 6.1.22. Strict guidelines will be followed for chemical storage, ensuring all chemicals are securely contained and stored at a safe distance from any drainage ditches to prevent environmental contamination. Storage areas will be strategically placed at a safe distance from any drainage routes leading to the River Thames to prevent any risk of environmental contamination.
- 6.1.23. A dedicated programme for the regular inspection and maintenance of drainage systems will be established to ensure they remain clear of blockages and function effectively. Regular monitoring and upkeep of the drainage infrastructure will play a critical role in maintaining environmental safety and compliance, ensuring that the system's design accommodates the unique hydrological dynamics of the Thames region and the impacts of climate change on expected flood profiles.

6.2. FLOOD EMERGENCY RESPONSE

FLOOD TRIGGERED ACTION RESPONSE PLAN (TARP)

Level 1 – Flood Alert

- 6.2.1. **Trigger and Timing:** Issued by the Environment Agency when flooding is possible, typically between 2 hours to 2 days in advance.
- 6.2.2. Plant Manager's Role:
 - Begins tracking weather information frequently, keeping the Site Manager informed.

- Monitors drainage ditches and river levels and conducts inspections of low-lying areas.
- Ensures waste containers/septic tanks in low-lying areas are emptied.
- Informs the ERT about the Flood Alert and subsequent actions.

Level 2 – Flood Warning

- 6.2.3. **Trigger and Timing:** Issued by the Environment Agency when water levels are rising, and more rain is expected. The lead time for these warnings can vary between 30 minutes to one day, based on the specific flood risk characteristics.
- 6.2.4. **Plant Manager's Role:** On receipt of a Flood Warning, the Plant Manager initiates the following actions. If the Plant Manager, based on field observations, deems the risk of flooding imminent, these actions are initiated regardless of an official Flood Warning:
- prioritise the relocation of all non-essential equipment containing hydrocarbons or chemicals to higher ground; and
 - ensure the ERT is prepared for potential Site evacuation.
- 6.2.5. **ERT Actions:**
- move remaining essential equipment containing hydrocarbons or chemicals to higher ground or secure within bunding;
 - relocate any critical equipment from lower levels of cabins or vulnerable areas; and
 - position sandbags strategically around emergency generators and other critical infrastructure to mitigate water ingress.

Level 3 – Severe Flood Warning

- 6.2.6. **Trigger and Timing:** Indicates that severe flooding is expected, requiring immediate precautions.
- 6.2.7. **Plant Manager's Role:**
- activates the site's Emergency Alarm;
 - coordinates with ERT to ensure the safe evacuation of all personnel from the Site; and
 - isolates electricity and water supplies to mitigate risks during the flood.

POST-FLOOD ACTIONS

- 6.2.8. After the flood recedes, the Plant Manager shall mark high water lines for documentation and survey them to record the maximum flooding condition.
- 6.2.9. Use collected information for public education, financial assistance justification, and future flood infrastructure planning.

7. TERRORISM OR OTHER SUBSTANTIAL THREAT TO SECURITY

7.1. TERRORISM OR OTHER SUBSTANTIAL THREAT TO SECURITY RISK OVERVIEW

- 7.1.1. The Proposed Scheme acknowledges the risk of terrorism or other substantial threats to security. This section outlines the fundamental measures for effectively managing these risks, ensuring the safety of personnel and the integrity of the facility.
- 7.1.2. Further detailed response actions for terrorism or other substantial threat to security (TOSTS) will be developed before completion of the construction phase of the Proposed Scheme.

7.2. HANDLING TERRORIST ACTIONS (ACTUAL OR THREATENED)

- 7.2.1. Upon receiving credible information regarding a terrorist threat, immediate action includes contacting law enforcement authorities.
- 7.2.2. The management team will follow police instructions diligently.
- 7.2.3. In case of a bomb threat or similar emergency, a specific procedure will be activated, focusing on gathering key information while ensuring the safety of all personnel. This includes recording information such as:
- Caller details: Gender, age estimate, voice characteristics, accent, and mannerisms.
 - Threat details: Timeframe, location of the threat, type of threat (explosive, incendiary), and any specific demands or grievances.
 - Caller's knowledge: How the caller obtained information about the threat.
- 7.2.4. Decisions regarding Site evacuation, communication with emergency services, and restricting certain communications (like VHF radios) will be made in accordance with established protocols and law enforcement guidance.
- 7.2.5. The Plant Manager or their deputy will be promptly informed and will prepare evacuation as per the confirmed evacuation procedure and relevant 'Incident Control Action Sheets' developed for the Proposed Scheme.

7.3. RESPONDING TO INTRUDERS ONSITE

- 7.3.1. Immediate police notification is the first step in response to an intruder on site.
- 7.3.2. All personnel will be instructed to avoid personal risk.
- 7.3.3. Efforts will be made to limit the intruder's access to sensitive areas and to monitor their activities using security systems.
- 7.3.4. Collaboration with law enforcement for search procedures and managing the situation will be a priority.

- 7.3.5. The Plant Manager or their deputy will be informed to activate the necessary response as per the full EPRP.
- 7.3.6. To enhance response capabilities against potential intruders, the Site will deploy advanced CCTV systems mounted at height on poles throughout the site. This elevated positioning ensures comprehensive surveillance coverage, aiding in the early detection and assessment of security threats. Integrated pole top luminaires and bollard type lighting will illuminate key areas, improving visibility for both CCTV operation and security personnel, thereby optimising the Proposed Scheme's readiness to effectively manage intruder incidents.

7.4. RECOVERY AND REVIEW POST-INCIDENT

- 7.4.1. After an incident, a comprehensive review will be conducted to assess the response and identify areas for improvement.
- 7.4.2. This review will inform future modifications to the full EPRP to enhance readiness for similar incidents.

8. EMERGENCY RECOVERY AND REVIEW

8.1. OVERVIEW

- 8.1.1. The primary focus during an emergency is the effective response led by the ERT, temporarily sidelining normal business operations.
- 8.1.2. Recovery considerations begin immediately upon the start of an incident, aiming to lessen operational impacts and shorten the incident duration.

8.2. TRANSITION FROM EMERGENCY RESPONSE TO RECOVERY

- 8.2.1. The transition from active emergency response to recovery is a delicate process. The Plant Manager, in collaboration with the Incident Controller and the ERT will determine the end of emergency response activities.
- 8.2.2. This decision is made when the emergency is contained, immediate effects have been addressed, and there is no expectation of escalation.

8.3. REGULATORY REPORTING AND MEDIA COMMUNICATION

- 8.3.1. Certain emergencies must be reported to the appropriate regulatory authorities, considering the type of emergency and its impacts.
- 8.3.2. The types of authorities and communication protocols for reporting will be established in the full EPRP before the end of the construction phase.
- 8.3.3. Communication with the media is restricted to authorised personnel only, with all media inquiries directed to nominated personnel which will be detailed in the final communication plans for the Proposed Scheme.

8.4. INCIDENT REPORTING

- 8.4.1. The notification, investigation, and reporting of emergency incidents shall comply with the Applicant's incident reporting and investigation procedures.

8.5. EMERGENCY INCIDENT REVIEW AND DEBRIEF

- 8.5.1. Each emergency incident will undergo a comprehensive investigation aimed at identifying the root causes, in accordance with incident investigation procedures developed for the Proposed Scheme.
- 8.5.2. Operational debriefs will form a key component of the review process, providing an opportunity to share findings and lessons learned with all relevant personnel.
- 8.5.3. The review process will critically evaluate the effectiveness of existing risk assessments, emergency arrangements, and health, safety, and environmental documentation. This evaluation aims to identify areas requiring improvement to enhance overall safety and preparedness.

9. CONSULTATION

9.1.1. The following stakeholders are likely to (but are not limited to) be consulted during the development of the full EPRP:

- Environment Agency;
- London Borough of Bexley (Emergency Planning function);
- Lead Local Flood Authority;
- London Fire Brigade; and
- Port of London Authority (where relevant to works in the River Thames).

10. PLAN REVISION AND ADMINISTRATION

- 10.1.1. **Ownership and Development:** The full EPRP, to be developed in alignment with this document, will be under the ownership of the Applicant. This comprehensive plan will be established prior to the initiation of operations within the Proposed Scheme.
- 10.1.2. **Plan Status and Accessibility:** The full EPRP will be a controlled document. The master copy, authorised by the designated manager, must be continuously accessible on a secure, internal platform. As a living document, the full EPRP requires regular updates and revisions to reflect operational changes.
- 10.1.3. **Revision and Correction Process:** Any identified need for changes or corrections should be communicated to the responsible emergency services team. This continuous feedback loop ensures the full EPRP remains current and effective.
- 10.1.4. **Review and Update Cycle:** The full EPRP, alongside all Site emergency procedures and related documents, will undergo a review at least every three years or as dictated by legislative changes or operational requirements. Additionally, reviews will follow emergency training drills, actual emergency events, or on an annual basis to guarantee ongoing effectiveness.
- 10.1.5. **Distribution and Amendment Control:** The responsibility for distributing the plan and controlling its amendments rests with the Plant Manager or their nominated deputy. This includes ensuring that revisions are reflected in training and operational procedures.
- 10.1.6. **Controlled Documentation:** This Plan and all supporting documents are to be maintained as controlled documents within the organisation's document management system.

11. REFERENCES

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- ² Environment Agency. (2021) 'Guidance note - Fire prevention plans: environmental permits'. Available at: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>
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- ⁷ Health and Safety Executive. (2002). 'Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)'. Available at <https://www.legislation.gov.uk/uksi/2002/2776/contents/made>
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- ¹⁰ Environment Agency. (n.d.). 'Guidance note – Check for flooding: What to do in a flood'. Available at: <https://check-for-flooding.service.gov.uk/what-to-do-in-a-flood>
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