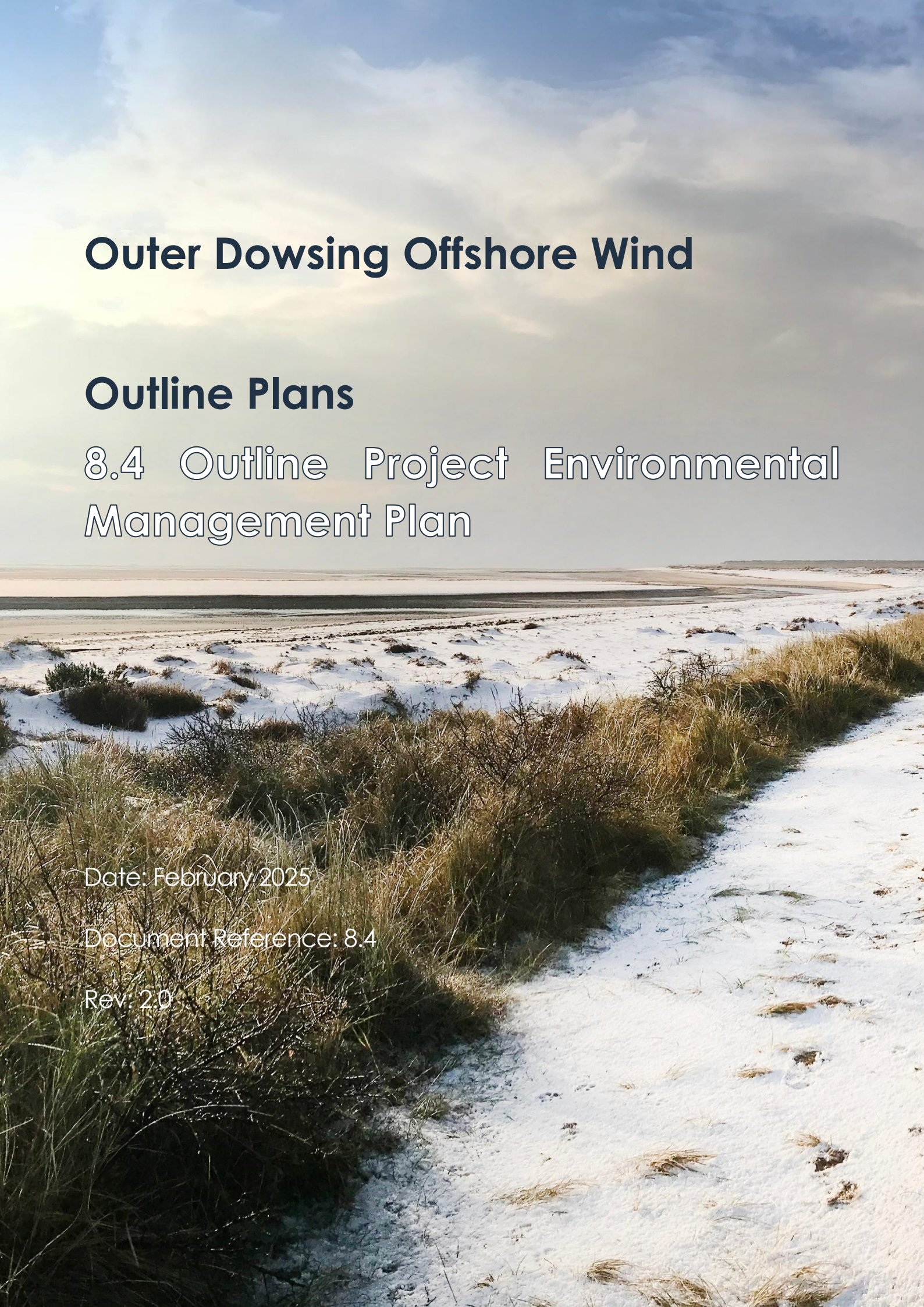

Outer Dowsing Offshore Wind

Outline Plans

8.4 Outline Project Environmental Management Plan

Date: February 2025

Document Reference: 8.4

Rev: 2.0

Company:	**Outer Dowsing Offshore Wind**	Asset:	**Whole Asset**
Project:	**Whole Windfarm**	Sub Project/Package:	Whole Asset
Document Title or Description:	8.4 Outline Project Environmental Management Plan		
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Rev No.	Date	Status / Reason for Issue	Author	Checked by	Reviewed by	Approved by
1.0	March 2024	For DCO Application	GoBe	GoBe	Outer Dowsing	Outer Dowsing
2.0	February 2025	Deadline 4a	GoBe	GoBe	Outer Dowsing	Outer Dowsing

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
ANS	Artificial Nesting Structure
CRA	Chemical Risk Assessment
DCO	Development Consent Order
dML	deemed Marine Licence
EMS	Environmental Management System
EMP	Environmental Management Plan
EPCI	Engineering, Procurement, Construction and Installation
ES	Environmental Statement
FLCP	Fisheries Liaison and Coexistence Plan
FLO	Fisheries Liaison Officer
GT R4	The Applicant. The special project vehicle created in partnership between Corio Generation (and its affiliates), Gulf Energy Development and TotalEnergies
GULF	Gulf Energy Development
HSE	Health, Safety and Environment
HVAC	High Voltage Alternating Current
IMCA	International Marine Contractors Association
IPMP	In Principle Monitoring Plan
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Plan
NSIP	Nationally Significant Infrastructure Project
ODOW	Outer Dowsing Offshore Wind
ORCP	Offshore Reactive Compensation Platform
OSS	Offshore Substation
PLONOR	Pose Little or No Risk to the Environment
PEMP	Project Environmental Management Plan
QHSE	Quality, Health, Safety, and Environment
UK	United Kingdom
WTG	Wind Turbine Generator

Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), Total Energies and Gulf Energy Development

Term	Definition
	(GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation, TotalEnergies and GULF.
Array area	The area offshore within which the generating station (including wind turbine generators (WTG) and inter array cables), offshore accommodation platforms, offshore transformer substations and associated cabling will be positioned, including the ORBA.
Deemed Marine Licence (dML)	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.
Export cables	High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
Landfall	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Onshore Infrastructure	The combined name for all onshore infrastructure associated with the Project from landfall to grid connection.
Offshore Reactive Compensation Platform (ORCP)	A structure attached to the seabed by means of a foundation, with one or more decks (including bird deterrents) housing electrical reactors and switchgear for the purpose of the efficient transfer of power in the course of High Voltage Alternating current (HVAC) transmission by providing reactive compensation
Offshore Substation (OSS)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents), containing— (a) electrical equipment required to switch, transform, convert electricity generated at the wind turbine generators to a higher voltage and provide reactive power compensation; and (b) housing accommodation, storage, workshop auxiliary equipment, radar and facilities for operating, maintaining and controlling the substation or wind turbine generators
Outer Dowsing Offshore Wind (ODOW)	The Project.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Wind turbine generator (WTG)	A structure comprising a tower, rotor with three blades connected at the hub, nacelle and ancillary electrical and other equipment which may include J-tube(s), transition piece, access and rest platforms, access ladders, boat access systems, corrosion protection systems, fenders and maintenance equipment, helicopter landing facilities and other associated equipment, fixed to a foundation

Reference Documentation

Document Reference	Title
6.1.3	Chapter 3: Project Description

1 Introduction

1.1 Background

1. GT R4 Limited (trading as Outer Dowsing Offshore Wind) hereafter referred to as the "Applicant", is proposing to develop Outer Dowsing Offshore Wind ("the Project"). The Project will include both offshore and onshore infrastructure including an offshore generating station (windfarm) located approximately 54km from the Lincolnshire coastline, export cables to landfall, onshore cables, connection to the electricity transmission network, ancillary and associated development and areas for the delivery of up to two Artificial Nesting Structures (ANS) and the creation of a biogenic reef (if these compensation measures are deemed to be required by the Secretary of State) (see Volume 1, Chapter 3: Project Description (Document Reference 6.1.3) for full details).

1.2 Purpose of this document

2. There are potential environmental sensitivities associated with an offshore windfarm development, which need to be identified and considered before construction of the project takes place.
3. This outline Project Environmental Management Plan (PEMP) is provided as part of the Development Consent Order (DCO) application in order to demonstrate the linkages between the impact assessments for the offshore components of the Project, offshore development activities, and likely conditions associated with the deemed marine licences.
4. This outline PEMP sets out the environmental management approach and controls that will be adopted by the Contractors, as appropriate. The finalised PEMP will include a Marine Pollution Contingency Plan (MPCP), Chemical Risk Assessment (CRA), and Waste Management Plan.
5. The MPCP will address the risks, methods and procedures to deal with any spills and collision incidents of the authorised scheme in relation to all activities carried out. The CRA will detail information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance. The FLCP will be developed to ensure relevant fishing fleets are notified of commencement of licensed activities pursuant to condition 7 of the DCO and to address the interaction of the licensed activities with fishing activities. Waste management and disposal arrangements and the appointment and responsibilities of a fisheries liaison officer will also be detailed in the final PEMP.
6. Additionally, for all wind turbine generator (WTG) foundations, a biosecurity plan will be detailed within the PEMP. The final PEMP will also include procedures to be followed within vessels transit corridors to minimise disturbance to red-throated divers.
7. The main purpose of this outline PEMP is to set out the framework for the final PEMP which will be produced post consent, including the controls that are proposed to manage the environmental risks associated with the construction and operation of the offshore elements of the Project.

1.3 Approach to Amending and Updating the PEMP

8. The final PEMP would be produced prior to construction and would set out the controls and processes that are to be adopted to mitigate environmental impacts of the Project. The PEMP is an iterative document that develops throughout the development and refinement of the project detailed design process, its procurement and construction.
9. A series of Engineering, Procurement, Construction and Installation (EPCI) contractors will be responsible for the detailed design, construction and installation of the main infrastructure associated with the project.
10. Requirements within the PEMP will be communicated to contractors, where relevant, to discharge the relevant licence conditions and to communicate project environmental requirements and standards to facilitate incorporation into their Environmental Management Plans. The PEMP will be the responsibility of the Project to manage in close working with the Contractors.

1.4 Structure of the PEMP

11. The PEMP will include the following information:

- Project Description and Environmental Sensitivities;
- Roles and Responsibilities;
- Associated Documentation;
- Management of Key Environmental Issues;
- Marine Pollution Contingency Plan;
- Chemical Risk Assessment;
- Waste Management Plan;
- Fisheries Liaison;
- Monitoring and Vessel Inspections;
- Vessel Management;
- Legislative and Regulatory Compliance;
- Training and Awareness;
- Communication and Reporting; and
- Subcontractor Management.

2 Project Description and Environmental Sensitivities

12. Volume 1, Chapter 3 (Document Reference 6.1.3) outlines the project description based on a design envelope. Following final design of the project, this section will set out information with regards to the detailed design and the associated environmental sensitivities. In particular, sensitive ecological, archaeological or human receptors, such as protected habitats, protected wrecks, constraints from other infrastructure, site layout plans, and the scope of works to be undertaken, would be considered.

3 Roles and Responsibilities

13. This section of the final PEMP will set out the key roles and responsibilities of those involved in the construction or operation of the Project from an environmental perspective. This will include the identification of key site staff, their environmental management responsibilities and how these link with other members of the Project Team, such as the Project Manager, the Project Health Safety and Environmental Manager(s) and/or Advisors along with environmental specialists such as Environmental Liaison Officer, Fisheries Liaison Officer (FLO), or Archaeologists, where relevant. The contact details for the key individuals listed will also be included in the final PEMP.
14. Interactions with stakeholders such as Statutory Nature Conservation Bodies (SNCBs) and the Marine Management Organisation (MMO) will also be covered in this section.

4 Management of Key Environmental Issues

15. This section will provide an overview of the controls and procedures to be adopted to mitigate the environmental impacts associated with the Project. Further details would be provided in the final PEMP following the final design.
16. An In Principle Monitoring Plan (IPMP) and a Schedule of Mitigation are provided with the DCO application, outlining the approach to monitoring and mitigation in respect of the Project based on the offshore impact assessments detailed in the Environmental Statement (ES) Chapters.
17. The final PEMP would include the relevant mitigation measures in respect of the environmental issues detailed in the Outline PEMP. This would enable communication of awareness of any sensitive areas and potential protected features, such as reefs, to the designated members of the Project Team. The procedures to be adopted in the event of an incident in proximity to these features would also be set out in the PEMP.

4.1 Dropped Object in the Marine Environment

18. Offshore incidents, where any form of object or material is lost to sea must be reported as a dropped object to the MMO as soon as reasonably practicable and recovered where they pose a potential hazard to other marine users.

4.2 Communication, Training and Awareness

19. This section will contain details of the communication, training and awareness requirements which contractors will be required to adhere to for the duration of the construction of the Project.

5 Marine Pollution Contingency Plan

20. This section will provide the details of the Projects Marine Pollution Contingency Plan.
21. The Project's Marine Pollution Contingency Plan will align with the guidance set by the following (or more up to date guidance available at that time):
    - Relevant port Oil Spill Contingency Plans which sets out how Harbour Authorities and other relevant organisations deal with an oil spill incident;
    - The MMO Marine Pollution Contingency Plan (MMO, 2023); and
    - The National Contingency Plan: A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations (MCA, 2014).

6 Chemical Risk Assessment

22. This section will provide details of the proposed chemicals to be used for the construction of the Project. Where relevant, this will comprise a risk assessment for the use of these chemicals in the marine environment, including consideration of whether they are approved for use offshore (e.g. included on the PLONOR list).

7 Waste Management Plan

23. This section will provide detail of the waste management plan for the Project.
24. The Project and its contractors will employ the waste hierarchy (Department for Environment, Food and Rural Affairs (Defra) 2011) principles throughout the pre-construction and construction operations, which comprises:
    - Prevention;
    - Re-use;
    - Recycle;
    - Other recovery; and
    - Disposal.
25. In the event that disposal of dredged sediment (associated with seabed preparation works or cable installation) is required, material will be deposited within an area of similar sediment characteristics, in close proximity to the dredge location in order to retain sediment within the sediment transport system. No material will be deposited outside the agreed disposal sites.

8 Fisheries Liaison

26. This section will contain relevant information as to the roles and responsibilities of the fisheries liaison officer for the Project and a summary of the Fisheries Liaison and Co-existence Plan (FLCP), which will be developed in line with the Outline FLCP.

9 Monitoring and Vessel Inspections

27. A programme of performance and compliance monitoring will be established for the site, this will be documented in the final PEMP and include, but not necessarily be restricted to, the following items in this section, where relevant.

9.1 Environmental Audits

28. Environmental audits will comprise both internal audit and external audits.
29. Environmental audits will be carried out by experienced auditors.

9.2 Vessel Inspections and Audits

30. This section will contain details of vessel inspections, audits and where relevant vessel routeing procedures.

9.3 Environmental Monitoring

31. An In Principle Monitoring Plan (IPMP) has been submitted with the DCO application. The requirement for appropriate design and scope of monitoring will be agreed with the appropriate regulators and stakeholders prior to construction works commencing. This section will provide details of monitoring relevant to the PEMP.

10 Training and Awareness

32. A range of mechanisms would be used for training and raising awareness of project environmental issues; these include environmental inductions, environmental notice boards, and environmental bulletins and alerts. This section will provide the detail of the training and awareness which will be carried out for the Project.

11 Communication and Reporting

33. This section will detail relevant communication and reporting protocols which will be followed to ensure compliance with this PEMP and other consent requirements. This section will also include details of contacts for the public to be raise complaints.

12 Sub-Contractor Management

34. The final PEMP will set out how the Principal Contractor manages their subcontractors. This may range from the selection and assessment processes through to the assessment of performance on the vessel.