Light Valley Solar

Outline Pollution and Spillage Response Plan

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Outline Pollution and Spillage Response Plan

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1 Introduction

1.1 Overview and purpose of the document

1.1.1 This document provides an outline Pollution and Spillage Response Plan (oPSRP) for the construction, operation, and eventual decommissioning of Light Valley Solar (the Proposed Development). It sets out the intended strategies for managing pollution and spillage incidents on site. The Applicant, Light Valley Solar Limited, has prepared this oPSRP as part of its Development Consent Order Application (DCO Application) relating to the Proposed Development.

1.1.2 An Environmental Impact Assessment (EIA) has been conducted for the Proposed Development, and an Environmental Statement (ES) has been compiled (Section 6 of the DCO submission) in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The ES evaluates the potential significant environmental impacts during all phases of the Proposed Development and outlines proposed mitigation strategies.

1.1.3 General pollution prevention is a key part of the project delivery as described in the ES. This includes compliance with law e.g. ensuring the design and construction plan follow the Oil storage regulations for businesses; good practice measures, such as stockpiling controls and maintaining suitable standoffs between construction activities and sensitive receptors; and other management plans. These include, but are not limited to, the Construction Environmental Management Plan (CEMP), which covers pollution prevention broadly; and the frac-out Bentonite Breakout Management contingency plan, which is required to be produced by the Outline CEMP [**EN0110012/APP/LVS/07.02**] and considers prevention of bentonite pollution.

1.1.4 A final PSRP will be developed following the appointment of a Principal Contractor (PC), prior to the start of construction. A Requirement is included in the draft DCO **[EN0110012/APP/LVS/03.01]** to ensure detailed management plans will be prepared to full versions by the appointed Contractor(s), substantially in accordance with the outline management plans, and will be submitted for approval by North Yorkshire Council in advance of starting the relevant phase of works.

1.1.5 This oPSRP presents the anticipated structure and environmental actions / commitments that may be incorporated into the final PSRP. This oPSRP also describes the monitoring procedures intended to verify the implementation and effectiveness of mitigation measures.

1.2 The Order Limits and Proposed Development

Order Limits

1.2.1 The Order Limits outline the maximum extent of the land that will be required to facilitate the construction, operation and maintenance, and decommissioning of

the Proposed Development and are shown on Figure 1.1: Site Location Plan and Order Limits (ES Volume 2) [**EN0110012/APP/LVS/06.02.01.01**] and the Illustrative Figure 2.1: Site Layout Plan (ES Volume 2) [**EN0110012/APP/LVS/06.02.02.01**]. The Order Limits are described in Chapter 2: The Proposed Development of the Environmental Statement (ES Volume 1) [**EN0110012/APP/LVS/06.01.02**].

1.2.2 The Order Limits cover an area of 1,270 hectares (ha) located within the administrative area of North Yorkshire Council, near Selby. It is possible that some temporary works may be required for construction access within the jurisdiction on York City Council. The Proposed Development comprises seven distinct Solar Development Sites totalling 900 ha of land.

The Proposed Development

1.2.3 The Proposed Development comprises a solar photovoltaic (PV) electricity generating station of over 100 megawatts (MW) and 'associated development' comprising a Battery Energy Storage System (BESS), grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases.

1.2.4 The main element of the Proposed Development comprises seven Solar Development Sites (Solar Development Sites 1-4 and 6-8) that will accommodate the Solar PV Panels. A BESS Compound will be located within Solar Development Site 2.

1.2.5 The Cable Route Corridor is the area within which the export connection cables (hereafter referred to as the 'Grid Connection Cables') would be located to connect the Solar PV Sites to the National Grid at the existing Monk Fryston Substation (hereafter referred to as the 'Existing National Grid Monk Fryston Substation') and the area within which cables connecting the Solar Development Sites would be located (hereafter referred to as 'Interconnecting Cables') (refer to Figure 2-1: Illustrative Site Layout Plan (ES Volume 2) **[EN0110012/APP/LVS/06.02.02.01]**.

1.2.6 Further details of the Proposed Development are presented in Chapter 2: The Proposed Development **[EN0110012/APP/LVS/06.01.02]** and the design envelope for the Proposed Development is set out in the Design Parameters and Commitments Document **[EN0110012/APP/LVS/05.06]** and the limits of deviation shown on the Works Plans **[EN0110012/APP/LVS/02.03]**.

1.3 Project team roles and responsibilities

1.3.1 Key roles and responsibilities in managing pollution and spillage response will likely include, but are not limited to:

1) Site Manager – Holds overall responsibility for site activities and will be based on site full time. This role applies during the construction and decommissioning phases.

2) Construction Stage Project Manager – Overall responsibility for ensuring full compliance with the DCO, CEMP, and all applicable environmental regulations and other requirements are implemented, and appropriately resourced, managed, reviewed and reported. This role applies during the construction phase only.

3) Decommissioning Stage Project Manager – Overall responsibility for ensuring full compliance with the DCO, DEMP, and all applicable environmental regulations and other requirements are implemented, and appropriately resourced, managed, reviewed and reported. This role applies during the decommissioning phase only

4) Environmental Manager – Responsible for the overall environmental management on site, ensuring adherence to legislation and best practices, and ensuring implementation of environmental mitigation measures. The Environmental Manager will oversee monitoring on site and carry out regular environmental site inspections, reporting and responding to any incidents or noncompliance, and liaises with relevant environmental bodies and other third parties as appropriate. This role applies during all phases of the Proposed Development.

5) Environmental Clerk of Works (ECoW) – Oversees the management of, and provides advice about, environmental and ecological risks during construction, including management of protected species, surface water management, pollution, air quality and noise. This role applies during all phases of the Proposed Development.

6) Flood Warden – There will be a dedicated individual responsible for preparing, and managing, the response to flood incidents and ensuring compliance with the approved Flood Warning and Evacuation Plan (FWEP), which will be developed taking into account the measures outlined in the Flood Risk Assessment (FRA) **[EN0110012/APP/LVS/06.03.15.01]**. This role applies during all phases of the Proposed Development.

7) Health and Safety Manager – Monitors and enforces health and safety compliance and related rules and regulations on site. This role applies during all phases of the Proposed Development.

8) Community Liaison Officer – Leads engagement with local communities through a formal Community Liaison Group, established in accordance with the CEMP. Acts as the main contact for public queries or complaints. This role applies during construction and decommissioning of the Proposed Development.

1.3.2 These roles and responsibilities are indicative and will be confirmed in the final PSRP. It is noted that the undertaker retains ultimate responsibility for implementing the PSRP under the DCO.

1.4 Summary of the outline Pollution and Spillage Response Plan

1.4.1 This oPSRP is organised as follows:

1) Section 1 (this section) introduces the document, describes the Proposed Development, and outlines project team roles and responsibilities.
2) Section 2 details typical environmental incidents which may occur, the principles of the response required, and specific response actions; and
3) Section 3 describes recommended monitoring methods to be considered following an incident if one were to occur.

2 Pollution prevention

2.1 Typical environmental incidents

2.1.1 The following activities in solar farm developments can cause pollution related issues:

1) Surface water erosion, and sediment runoff management controls;
2) Management of soil and stockpiles;
3) Installation of watercourse crossings and culverts;
4) Breakout from trenchless solutions such as HDD activities (i.e. HDD drilling mud);
5) Construction / establishment of site compounds and substations;
6) Construction, upgrading and maintenance of access roads and tracks;
7) Delivery, storage, handling and use of fuel, chemicals and oils;
8) Use of vehicles, plant and equipment;
9) Refuelling activities;
10) Waste management;
11) Wastewater management (including sewerage and foul waters);
12) Potential release of fuel, oils, chemicals and other contaminants from BESS and substation infrastructure during construction, operation and decommissioning activities, including leaks, spills and contamination risks associated with plant movement and excavation during decommissioning;
13) Potential release of firewater and other chemicals from BESS or substations;
14) On-site concrete batching;
15) Installation and removal of piles;
16) Photovoltaic (PV) panel washing (risk of thermal shock whilst carrying out cleaning activities on hot PV panels);
17) Application of pesticides and/or herbicides; and
18) Management and maintenance of oil/water interceptors (if present).

2.1.2 Battery fire water management is specifically excluded from this oPSRP as it is dealt with separately in the Outline Battery Safety Management Plan (oBSMP) **[EN0110012/APP/LVS/07.06]**. The oPSRP will apply to other pollution risks associated with BESS and substation infrastructure, such as loss of battery electrolyte, coolant fluid or transformer oils.

2.1.3 Mitigation strategies will be embedded within design specifications and method statements, following the principles of prevention, avoidance, reduction, compensation and remediation. The PC will be responsible for designing the

pollution prevention control measures. Full details will be included in the Construction Environmental Management Plan (CEMP), the Operational Environmental Management Plan (OEMP) and the Decommissioning Environmental Management Plan (DEMP) that the PC will adhere to. The CEMP, OEMP and DEMP will be developed in substantial accordance with the Outline CEMP [**EN110012/APP/LVS/07.02**], the Outline OEMP [**EN110012/APP/LVS/07.03**], and the Outline DEMP [**EN110012/APP/LVS/07.04**] respectively, as required by the DCO. This document focuses specifically on the response procedures for pollution and spillage incidents.

2.2 Principles of pollution and spillage response

2.2.1 Prior to the construction phase, the PC will develop detailed incident response procedures as part of the final PSRP. These procedures will begin with an investigation phase and follow the core principles of: Stop, Contain, Notify and Clean-Up.

2.2.2 If a pollution incident or environmental deterioration is identified — whether through direct observation, visual inspection, or trigger level exceedance through water quality monitoring or continuous telemetry — the incident response procedure will be initiated.

2.2.3 All relevant site personnel will be trained in pollution incident response procedures. It is expected that any incidents will be identified by site operatives, the appointed ECoW, or through the water quality monitoring methods described in Section 3.

2.2.4 The main steps in the response plan are shown in Plate 1, a process flow diagram which encompasses the Stop, Contain, Notify and Clean-Up procedure.

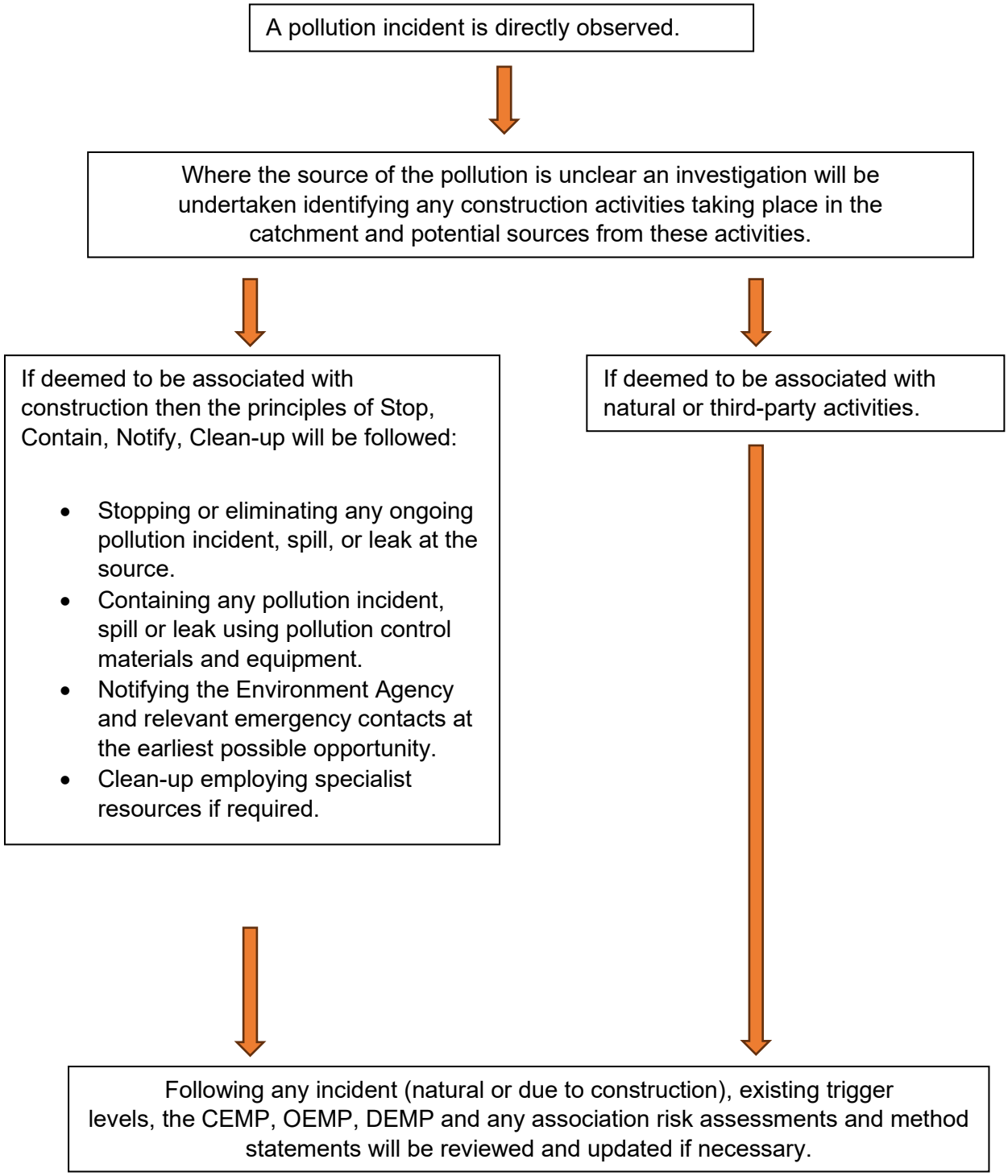


Plate 1 Process flow diagram outlining the main steps in the response plan

2.3 Response actions

Assess safety

2.3.1 Personnel must ensure safety to themselves and others prior to any environmental clean-up or tackling of an incident. Additional requirements include:

1) Identifying and mitigating any immediate safety risks;
2) Attending to any injured personnel and making the area safe;
3) Notifying the Site Manager / ECoW; and
4) Identifying spilled or leaked substance(s) and selecting the appropriate Personal Protective Equipment (PPE).

Stop at source

2.3.2 Upon detection of a pollution incident, the source must be identified. All activities that could exacerbate the incident must be halted, and any spill or leak should be stopped and contained, provided it is safe to do so.

Containment

2.3.3 Containment ensures that any ongoing spill or leak does not continue to enter soils, groundwater, watercourses or other water features. Containment procedures include:

1) The deployment of pollution control equipment, including spill kits, drip trays, or bunds of earth or sand; and
2) Inspecting to ensure pollutants have not reached drainage systems, watercourses, or other sensitive receptors.

2.3.4 Spill kits will be the primary pollution control equipment on site. They will be available within all construction compounds, the site office(s), substation control room(s), and in all work vehicles. The spill kits will be tailored to the types of pollutants expected on the site. The spill kit locations will be marked on site plans within the final CEMP, OEMP, DEMP and Risk Assessment Method Statement (RAMS) and communicated during site inductions.

2.3.5 The recommended content and placement of spill kits will be finalised post-consent and detailed in the final CEMP, OEMP and DEMP. Additionally, all contaminated materials will be disposed of in accordance with the Materials and Waste Management Plan (MWMP) and spill kit material replaced. The MWMP will be developed in substantial accordance with the Outline MWMP (oMWMP [**EN110012/APP/LVS/07.07**]). Following any pollution and containment incident, the relevant personnel will assess the remaining quantity of spill kits on site and replenish the stocks as necessary.

2.4 Notification requirements

2.4.1 The Site Manager will serve as the primary contact for all identified pollution incidents. The Site Manager will notify the ECoW as soon as possible upon discovery of any spill or leak incident. The ECoW will advise on any further response requirements and, after consultation with senior personnel, the requirements to contact external key contacts, such as the Environment Agency (EA), as required. The necessary emergency contact details will be listed within the final CEMP, OEMP and DEMP and an Emergency Response Plan and will be adopted and updated during each phase of the Proposed Development.

2.4.2 When notifying emergency contacts during a significant pollution or spillage incident, the following information should be provided where applicable:

1) Name and contact details of the reporting individual;
2) Location of the source of the pollution/spill incident;
3) Substances involved, including estimated quantities;
4) Any other immediate hazards;
5) Status of safety of personnel, equipment and assets;
6) Any impacted receptors; and
7) The potential for linkage of pollutants to receptors.

2.5 Clean-up and remediation

2.5.1 Clean-up operations will begin as soon as possible after the source of the spill or leak has been stopped and contained. Clean-up and remediation activities following a pollution / spillage event will be undertaken internally or by an external specialist contractor, which will be determined by the senior personnel. The following procedures will be followed during clean-up and remediation:

1) Residual pollutants on hardstanding, equipment and machinery, or natural ground will be cleaned using safe and suitable methods including excavation of contaminated ground if necessary; liquids can generally be soaked up using absorbent material;
2) Pollutants present in water will be removed using appropriate absorbent materials such as booms, pads, or wood chips. These materials will be replaced at the source until pollutants have been removed or degraded; and
3) Contaminated materials will be removed and stored in designated storage facilities. The disposal will be undertaken by waste management contractors in compliance with regulatory requirements.

2.6 Reporting and investigation

2.6.1 All environmental incidents and near misses will be recorded by the PC and submitted to the Applicant and ECoW. While the PC will align the proforma to

their management requirements, the following minimum information must be recorded:

1) Name and contact details of the person reporting the incident;
2) Date, time, and location of the incident (if known);
3) Type, category, nature, and description of the incident, including estimated quantities/volumes (if known);
4) Notifications made and the response / corrective actions taken;
5) Root cause of the incident (if known);
6) Measures implemented to prevent recurrence; and
7) Assigned responsibilities, including incident owner and sign-off.

3 Monitoring considerations

3.1 Monitoring locations

3.1.1 Monitoring locations will be based on the detailed design of the Proposed Development and the source pathway receptor model. Within the Order Limits there will be no restriction on location, outside of the Order Limits monitoring locations will only be taken forward and located where it is possible to do so, dependent on agreement for access. If access to locations outside the Order Limits is not possible, this will not affect the overall efficacy of the monitoring plan, as suitable monitoring can still be undertaken within the Order Limits. Where access for monitoring locations is possible, monitoring locations would be positioned to determine risk to sensitive receptors at appropriate locations, such as:

1) Along minor watercourses within the Order Limits, including upstream and downstream of surface water outfalls and watercourse crossings, and at locations where construction or decommissioning activities present a potential risk to water quality;
2) Upstream of licensed or private water supply boreholes, springs or surface water sources;
3) Sites of Special Scientific Interest (SSSI) (e.g., Burr Closes SSSI); and
4) Locations where any incidents occur.

3.2 Monitoring methods

Visual monitoring

3.2.1 During the construction phase, the ECoW and construction team will conduct visual inspections of watercourses and water management systems. These checks will look for signs of colour change, oil, scum, turbidity, aquatic non-native species, and algal blooms. Inspections will include observations from the banks and drainage management features to record the water and runoff conditions. A standardised template will be developed to ensure consistency in recording visual checks.

3.2.2 In active construction areas visual checks will be undertaken daily, with observations reported back to senior personnel on a weekly basis. The visual inspections will be focussed on areas where high risk activities are being undertaken, such as concrete pouring, stockpiling of materials and refuelling.

In-situ monitoring

3.2.3 Watercourses will be monitored using handheld water quality instruments capable of measuring parameters such as dissolved oxygen, electrical conductivity, pH, temperature and turbidity instantaneously.

3.2.4 These devices will allow for real-time indication of water quality in the sampled watercourses by simultaneously measuring several water quality parameters. For safety, all sensors will be attached to a cable that will allow site workers to collect measurements away from potentially unstable banks or during periods of high flow.

Water quality sampling

3.2.5 Water samples will be collected and sent to a UKAS-accredited laboratory for analysis (Ref 1). The parameters to be tested will be established based on standard testing suites, in conjunction with the EA, baseline data from watercourses within and adjacent to the site boundary and any potential chemicals/ fuels present during site works. Laboratory analysis may be used to support and verify in-situ monitoring results, where required.

3.3 Monitoring frequency and duration

3.3.1 Pre-construction monitoring will be undertaken to establish baseline conditions at identified monitoring locations. Monitoring shall include sampling of representative upstream, downstream and groundwater receptor locations, where relevant. As a minimum, baseline monitoring shall be undertaken on a monthly basis for a period of six months prior to commencement of construction works, aligned to the construction programme at the relevant site, unless otherwise agreed with the EA. Where receptors are particularly sensitive, or where significant seasonal variations in water quality are anticipated, the monitoring period may be extended to up to 12 months to ensure representative baseline conditions are established. Monitoring parameters shall be agreed based on the identified pollution risks and sensitivity of the receiving environment.

3.3.2 During construction, daily visual monitoring will be undertaken when construction activities are within 500 m or upstream/ upgradient of a monitoring location, by the ECoW and key construction team members. Weekly visual monitoring will be undertaken at all locations by the ECoW.

3.3.3 The frequency and duration of any required in-situ monitoring and water quality sampling will be set out in the PSRP and agreed with the ECoW, taking into account the construction methods and risks posed to receptors. Monitoring will generally be undertaken on a monthly basis; however, the frequency will be proportionate to the level of risk, with increased monitoring applied during higher-risk activities (e.g. earthworks, concrete works and drainage installation), to ensure the monitoring programme is capable of identifying trends and enabling appropriate corrective action where necessary.

3.3.4 Following the construction period in-situ monitoring and water quality sampling will continue into the first few months of the operational phase, to confirm that mitigation measures are functioning effectively and ensure there is no risk to water quality from the project. Upon completion of construction, visual checks will be made to identify any new flow pathways that may have appeared due to the installation of the Proposed Development.

3.3.5 A monitoring plan will be developed, as part of the detailed plan, which will outline the frequency and duration of water quality monitoring prior to and during construction, the first few months of operation, and decommissioning, as relevant. The monitoring plan will be developed in consultation with the EA. Baseline monitoring will be undertaken prior to construction, with sufficient duration to characterise existing conditions.

3.4 Response training and testing

3.4.1 All relevant personnel working on the Proposed Development will receive basic spill response training. Personnel with responsibilities for dealing with environmental incidents and/or handling hazardous liquids with the potential to cause pollution will receive specialist spill response training. Records of all training will be maintained by the PC and made available for inspection.

3.4.2 The PC, with the support of the ECoW, will be responsible for periodic testing of emergency procedures during construction, operation and decommissioning, including spill response. Records of emergency response testing will be documented and retained on site for review.

3.4.3 The PC will have a contingency plan involving the procurement of specialist contractors to deal with major incidents involving highly polluting liquids and / or material that the site personnel are not able to deal with. The specialist contractor performing this service will be made familiar with the logistics of the site and be available to respond on an emergency basis. Contact details for the specialist contractor will be detailed in the final CEMP.

References

Ref 1 United Kingdom Accreditation Service (UKAS) (2025) [Online]. Available at: [redacted] [Accessed October 2025].

Abbreviations and Glossary

Abbreviation	Definition
BESS	Battery Energy Storage System
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
ECoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
HDD	Horizontal Directional Drilling
MWMP	Materials and Waste Management Plan
NSIP	Nationally Significant Infrastructure Project
oBSMP	Outline Battery Safety Management Plan
oCEMP	Outline Construction Environmental Management Plan
oMWMP	Outline Materials and Waste Management Plan
oPSRP	Outline Pollution and Spillage Response Plan
PC	Principal Contractor
PPE	Personal Protective Equipment
PSRP	Pollution and Spillage Response Plan
PV	Photovoltaic
RAMS	Risk Assessment Method Statement
SSSI	Site of Special Scientific Interest
UKAS	United Kingdom Accreditation Service

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