MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Outline Spillage and Emergency Response Plan
F03

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Glossary

Term	Meaning
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Frac-out	Applies where trenchless techniques are used to install the onshore export cable to cross obstacles; there is the risk that drilling muds escape to the surface during the drilling process.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore and onshore infrastructure connecting the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the national grid. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds. Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).

Term	Meaning
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Onshore	The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds). Also referred to in this report as the Onshore Order Limits, for ease of reading.

Acronyms

Acronym	Meaning
BAOL	Blackpool Airport Operations Limited
CIP	Copenhagen Infrastructure Partners
CIRIA	Construction Industry Research and Information Association
CoCP	Code of Construction Practice
DCO	Development Consent Order
EA	Environment Agency
EnBW	Energie Baden-Württemberg
ES	Environmental Statement
GPP	Guidance for Pollution Prevention
HDD	Horizontal Directional Drilling
JNbp	JERA Nex bp
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
PPE	Personal Protective Equipment

Units

Unit	Description
kV	Kilovolt
m	Metre
nm	Nautical mile
%	Percentage

1 Outline Spillage and Emergency Response Plan

1.1 Background

1.1.1 Introduction

1.1.1.1 Morgan Offshore Wind Limited (Morgan OWL), a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW), is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project is a proposed wind farm in the east Irish Sea.

1.1.1.2 Morecambe Offshore Windfarm Ltd (Morecambe OWL), owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V), is developing the Morecambe Offshore Windfarm, also located in the east Irish Sea.

1.1.1.3 This document forms the Outline Spillage and Emergency Response Plan prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as 'the Transmission Assets').

1.1.1.4 This Outline Spillage and Emergency Response Plan has been updated for Deadline 4 to include the following:

- Update to Requirement 8 wording in line with the draft Development Consent Order (document reference C1) to include Blackpool Airport Operations Limited (BAOL) as a consultee along with the relevant management plans upon which BAOL will be consulted by the relevant planning authority.
- Clarification of the roles and responsibilities for implementing this outline management plan.
- Clarification that the measures within this outline management plan will be implemented during the onshore site preparation works.
- Clarification on incident response procedures.
- Clarification on monitoring and reporting procedures.

1.1.2 Implementation

1.1.2.1 This Outline Spillage and Emergency Response Plan forms an appendix to the Outline Code of Construction Practice (CoCP) (document reference J1). Following the granting of consent for the Transmission Assets, detailed Spillage and Emergency Response Plans will be prepared as a part of the detailed Code of Construction Practice(s) on behalf of Morgan OWL and/or Morecambe OWL, prior to commencement of the relevant stage of works and will follow the principles established in this Outline Spillage and Emergency Response Plan. The detailed Spillage and Emergency Response Plans will require approval by the relevant planning authority following consultation with relevant stakeholders. The Applicants and all appointed contractors will be

responsible for the implementation of the detailed Spillage and Emergency Response Plans.

1.1.2.2 The Applicants have committed to implementation of detailed Spillage and Emergency Response plans via the following commitment, CoT35 (see Volume 1, Annex 5.3: Commitments Register, document reference F1.5.3), and is secured by inclusion of Requirement 8 of the draft Development Consent Order (DCO) (document reference C1) Schedules 2A & 2B. Below sets out the requirement wording for Project A (Project B's requirement mirror those of Project A for this requirement and are, therefore, not repeated):

8.—(1) No stage of the Project A onshore works or Project A intertidal works may commence until for that stage a code of construction practice has been submitted to and approved by the relevant planning authority following consultation as appropriate with –

(a) Lancashire County Council;

(b) Natural England;

(c) the Environment Agency;

(d) in relation to the Project A intertidal works or, if applicable to the Project A offshore works, the MMO; and

(e) in relation to the Project A Blackpool Airport works, BAOL to the extent specified in the outline code of construction practice.

(2) Each code of construction practice must accord with the outline code of construction practice and include, as appropriate to the relevant stage…

(h) spillage and emergency response plan (in accordance with the spillage and emergency response plan); …

(3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works.

1.1.2.3 Requirement 8(1)(e) identifies BAOL as a named consultee prior to the approval by the relevant planning authority of detailed codes of construction practice. BOAL will be consulted in relation to a stage of construction that includes either the Project A Blackpool Airport Works or the Project B Blackpool Airport Works. With regards to the management plans to be appended (as appropriate to the relevant stage) to the detailed codes of construction practice, BAOL will be consulted on the Spillage and Emergency Response Plan (in accordance with the outline Spillage and Emergency Response Plan by the relevant planning authority).

1.1.2.4 The Transmission Assets may adopt a staged approach to the approval of DCO requirements. This will enable requirements to be approved in part or in whole, prior to the commencement of the relevant stage of works in accordance with whether staged approach is to be taken to the delivery of the each of the offshore wind farms.

1.1.2.5 For onshore and intertidal works (landward of Mean Low Water Springs (MLWS)), this approach will be governed by the inclusion of Requirement 3

within the draft DCO, which requires notification to be submitted to the relevant planning authority/authorities detailing whether Project A or Project B relevant works will be constructed in a single stage; or in two or more stages to be approved prior to the commencement of the authorised development.

1.1.3 Purpose and scope of this Outline Spillage and Emergency Response Plan

1.1.3.1 The purpose of this Outline Spillage and Emergency Response Plan is to set out the key procedures for controlling and managing spillages should they occur during the onshore site preparation works and construction of the Transmission Assets.

1.1.3.2 Onshore site preparation works are defined in article 2 of the draft DCO (document reference C1). This Outline Spillage and Emergency Response Plan applies to the onshore site preparation works and construction activities for the Transmission Assets located landward of MLWS and does not consider construction impacts seaward of MLWS.

1.1.3.3 Onshore site preparation works will be undertaken prior to the commencement of construction. These works will be undertaken in accordance with the measures in this Outline Spillage and Emergency Response Plan as certified through the DCO.

1.1.3.4 The measures within this outline management plan are in accordance with best practice and are appropriate to manage the impacts associated with onshore site preparation works

1.2 Roles and responsibilities

1.2.1 Overview

1.2.1.1 The key roles and associated responsibilities with regard to this Outline Spillage and Emergency Plan are set out below. The Construction (Design and Management) Regulations 2015 also identify the legal duties, responsibilities and obligations of all the major roles within the construction team.

1.2.1.2 The responsibilities of each role will be refined in the detailed Spillage and Emergency Response Plans.

1.2.2 Applicants

1.2.2.1 The Applicants will be responsible for the following:

- Ensuring that the outline Spillage and Emergency Response Plan is implemented effectively
- Giving necessary direction to contractors (for example, setting contractual obligations)

- Preparing the detailed Spillage and Emergency Response Plans and undertaking reviews and refining the Spillage and Emergency Response Plans (where necessary) in conjunction with the Principal Contractors.

1.2.3 Principal Contractors

1.2.3.1 Principal Contractors will be appointed by Morgan OWL and Morecambe OWL and have the overall responsibility for:

- Delivering the outline and detailed Spillage and Emergency Response Plans on behalf of the Applicants
- Ensuring all procedures in the outline and detailed Spillage and Emergency Response Plans are followed.
- Maintaining records relevant to the outline and detailed Spillage and Emergency Response Plans.

1.2.4 Contractors/Subcontractors

1.2.4.1 Contractors and subcontractors will be responsible for undertaking construction works in accordance with the outline and detailed Spillage and Emergency Response Plans.

1.2.5 Training

1.2.5.1 Training will be given to all construction staff on their responsibilities for procedures to follow in the event of an emergency incident including who should be notified. Staff will all be instructed on the use of emergency equipment and spill kits, where the kits are located and how the contaminated spill kit material should be handled after use.

1.3 Methodology

1.3.1 Best practice guidance

1.3.1.1 Construction works will be undertaken in accordance with good practice advice, this will include but not be limited to:

- Control of Water Pollution from Construction Sites (C532), Construction Industry Research and Information Association (CIRIA 2001);
- Control of Water Pollution from Linear Construction Projects (C648), (CIRIA 2006a);
- Control of Water Pollution from Linear Construction Projects: Site Guide (C649), (CIRIA 2006b);
- Environmental Good Practice on Site (C811), (CIRIA 2023); and
- Guidance for Pollution Prevention (GPP) documents (https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/).

1.4 Understanding the risk

1.4.1 Pollution sources

1.4.1.1 The following key sources of pollution have the potential to cause harm to human health and/or pollution of the environment:

- overfilling or poor handling of containers;
- damaged containers;
- containment failure;
- failure of pipework or underground tanks;
- collision or accident;
- weather related problems e.g., flooding;
- fires;
- vandalism; and
- runoff from exposed ground, excavations and material stockpiles.

1.4.2 Spill prevention practices

1.4.2.1 During construction, there are activities that will be undertaken that prevent the risk of a spillage (and as a result, pollution).

1.4.2.2 The following best practice measures will be implemented.

- Areas at risk of spillage, such as vehicle maintenance areas and hazardous substance stores (including fuel, oils and chemicals) will be bunded and carefully sited to minimise the risk of hazardous substances entering drainage systems or local watercourses. Additionally, the bunded areas will have impermeable bases to limit the potential for migration of contaminants into groundwater following any leakage/spillage.
- Oil and fuel will be stored in a bunded compound. Containment areas should be capable of containing 110% of the volume of the single largest container of hazardous materials being stored or 25% of the total capacity of all containers, whichever is the greater and be located. These should be located in designated areas taking into account security, the location of sensitive receptors and pathways such as drains and watercourses, and safe access and egress for plant and manual handling. Spill response materials will be provided nearby and be readily accessible, with personnel trained in spill response.
- Where practicable, oil, fuel and chemical storage areas will be covered to prevent rainwater getting into the bund and reducing its capacity. Where storage areas cannot be covered, bunds will be maintained with a separator to ensure that contaminants are not released.
- Oils and chemicals will be clearly labelled, and the site should retain an up-to date Control of Substances Hazardous to Health inventory.

Activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling, will be undertaken by designated and trained personnel.

- Oil, fuel and chemical storage areas will be inspected, at least weekly for signs of spillage, leaks and damage in line with the requirements of the Environmental Management System. Rainwater, materials and general debris will be stored in bunds and drip trays that compromise contingency storage shall be removed as part of the maintenance programme and in accordance with regulatory protocols.
- All plant machinery and vehicles will be routinely checked and be maintained in a good condition to reduce the risk of fuel leaks.
- Facilities storing oils and fuels will be locked and made secure when not in use.
- Small plant will be provided with drip trays or commercial 'plant nappies'.

1.4.2.3 In the case of emergency spillages spill kits are to be made available on site at all times as well as sand bags and stop logs for deployment.

1.4.2.4 Where possible, biodegradable hydraulic oil will be used in operational plant.

1.5 Monitoring and controls

1.5.1 Monitoring

1.5.1.1 To ensure the prevention practices are effectively implemented, a monitoring checklist will be prepared. The checklist will facilitate regular and consistent checks are undertaken and highlight where remedial action may be required.

1.5.1.2 The checklist will include the following points (the list is not exhaustive and further checks may be added to reflect site specific conditions):

- Inspection of the containers and tanks to ensure integrity of the containers/tanks is robust and to record any signs of deterioration. This inspection will be supplemented with records of the containers'/tanks' age and the manufacturer's recommendations for frequency of replacement
- Inspection of the secondary containment areas to ensure integrity of the structures remain robust (e.g. signs of cracking): this will include the wall and base of the bund
- Inspection for signs of staining within the containment areas and around the base of the containers/tanks; also look for signs of an oily sheen on the surface of puddles
- Inspection of pipework, hoses, taps and valves for signs of corrosion or splits
- Inspection of the secondary containment areas following periods of prolonged or heavy rain to identify if the capacity of the bund has been reduced as a result of accumulated rainwater and/or debris

- Inspection of vehicles and plant parking areas to record any signs of staining. This inspection will be supplemented with vehicle maintenance records.

1.5.2 Records

1.5.2.1 Completed checklists will be maintained at the site offices at the construction compounds. Where remedial action is required, records will be taken of the measures implemented and any follow-up monitoring will be added to the checklist as required.

1.6 Emergency incident response

1.6.1 Overview

1.6.1.1 All incidents associated with the onshore and intertidal construction activities of the Transmission Assets, including environmental incidents and non-conformance with the detailed CoCP, will be reported and investigated using the procedures that will be set out in the detailed Spillage and Emergency Response Plan.

1.6.2 Incident response plan

1.6.2.1 An incident response plan will be provided in the detailed Spillage and Emergency Response Plan and will consider the following points:

- site risks;
- list of key external and internal contacts (including environmental regulator, local authority and the fire service);
- reporting procedures;
- site plan including drainage and location of storage/refuelling areas;
- list of stored materials;
- details of local environmental receptors (e.g., abstractors, high amenity areas and fish farms);
- location of spill equipment; and
- procedures for spill containment and remediation.

1.6.3 The hierarchy of response

1.6.3.1 In the event of a spill during construction the pollution control hierarchy illustrated **Figure 1.1** will be followed to identify the most appropriate response. The actions are in order of preference with the most preferred action listed first.

1. Containing the spill at source is the most effective place to stop the spill spreading.

2. If the spill cannot be stopped at the source, containment close to the source should be the next priority.
3. If the spill is spreading, the aim should be to stop the material getting into any drains or unsurfaced ground.
4. If the spill has entered the drainage system, best efforts should be made to contain it there and stop it entering the environment.
5. If the spill has escaped into the watercourse, by containing it in the watercourse, environmental damage may be contained.

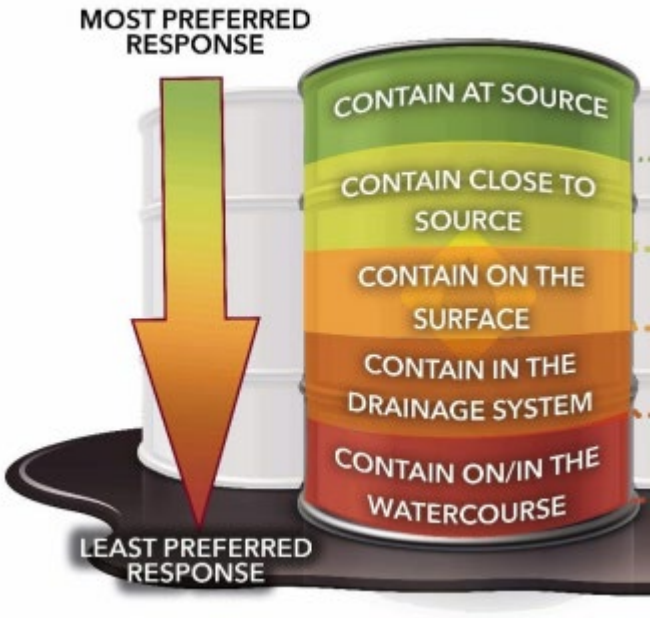

Figure 1.1: Pollution Control Hierarchy NetRegs (2018)

1.6.4 The event of a spill

1.6.4.1 In the event that the spill cannot be contained, the following procedure will be implemented in accordance with the plan set out in the detailed Spillage and Emergency Response Plan.

1. Works would stop within the vicinity of the incident.
2. The safety, health, environment, sustainability and quality manager would be contacted.
3. The scale of the incident would be assessed:
    a. if the incident was controllable by staff on the site, remedial action would be taken immediately
    b. if the incident could not be controlled by the staff on the site, emergency assistance would be sought.
4. The appropriate enforcing authority would be contacted and informed, including:

a. EA for incidents relating to or affecting rivers, groundwater and major emissions to atmosphere;

b. the local sewerage undertaker for incidents affecting sewers;

c. local authorities environmental health department for incidents that could affect the public; and

d. the Food Standards Agency for incidents that have the potential to affect food through deposition on crops or land used for grazing livestock.

5. The Applicants would instigate an investigation into the occurrence of the incident, as appropriate.
6. The findings would be sent to the appropriate enforcing authority where necessary.
7. An action plan would be prepared to determine why the incident occurred and whether any modifications to working practices would be required to prevent a recurrence.
8. If necessary, the detailed CoCP would be updated (and any other plans, as appropriate) and all workers would be notified.

1.6.5 Using a spill kit to control and clean up spillages

Spillages to ground

1.6.5.1 The following section summarises the approach that would be followed to clean up liquid spillages to ground using a spill kit:

- Booms within the spill kits will be deployed to contain the spill to prevent it spreading; the priority will be to avoid the spill flowing to any drains or watercourses (if present)
- Once the spill is contained, the absorbent pads will be used to blot up the spill; a single layer of pads will be used at a time. Additional Personal Protective Equipment (PPE) will be provided
- The absorbent pads will continue to be used until the spill has been blotted up. If the spill was on un-made ground, if may be necessary to excavate any contaminated soil. A suitably qualified environmental consultant will be contacted where necessary in accordance with the Discovery of Contaminated Land Strategy and is part of the CoCP, which is secured as a requirement of the DCO
- All used spill kits will be placed in the bags provided in the spill kit; the bags will be sealed and taken to the construction compound for later disposal.
- All spillages will be reported to the Environment Agency.

Spillages to a watercourse

1.6.5.2 There are a number of ordinary watercourses located within and adjacent to the Transmission Assets Order Limits. The following section summarises the

approach that will be followed in the event that a spillage reaches a watercourse:

- Oil absorbent floating booms will be installed across the surface watercourse to retain the spillage in a relatively small section and prevent pollution downstream. Where floating booms are used, they will be secured to both banks of the watercourse and will be checked to ensure that there are no gaps that would allow material to bypass the boom. Floating booms will only be installed by trained personnel
- Floating booms will be checked at least weekly and after a period of prolonged rain. Secondary booms may be installed where necessary
- Once the spill is contained, absorbent pads will be used to clean up the spilled material
- Where contaminated surface water has to be recovered, it will be managed in accordance with measures set out in the detailed Spillage and Emergency Response Plans.

1.6.6 Key contacts

1.6.6.1 Details of the key emergency contacts will be provided in the detailed Spillage and Emergency Response Plans once the project team has been confirmed.

Table 1.1: Table of key internal contacts

Title	Name	Contact Number
Site Manager/Supervisor	[X]	[X]
Safety, Health, Environment, Sustainability and Quality Manager (SHESQ)	[X]	[X]
Construction Officer	[X]	[X]

1.6.6.2 Details of key external emergency contacts are listed in Table 1.2.

Table 1.2: Table of key external contacts

Service	Contact Number/Details
Environment Agency incident hotline	0800 80 70 60
Lancashire Resilience Forum	www.lancashireprepared.org.uk
Fire Brigade	999
Police	999
Ambulance	999
NHS Trust	01772 695300

1.7 References

Construction Industry Research and Information Association (CIRIA) (2001); Control of Water Pollution from Construction Sites. Guidance for consultants and contractors (C532)

Construction Industry Research and Information Association (CIRIA) (2006a) Control of Water Pollution from Linear Construction Projects (C648)

Construction Industry Research and Information Association (CIRIA) (2006b) Control of Water Pollution from Linear Construction Projects: Site Guide (C649)

Construction Industry Research and Information Association (CIRIA) (2023) Environmental Good Practice on Site (C811)

NEA, Defra SEPA, NRW (2021) Guidance for Pollution Prevention (GPP) documents: https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/) Accessed September 2024