

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Outline Spillage and Emergency Response Plan



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Contents

1	OUTLINE SPILLAGE AND EMERGENCY RESPONSE PLAN	1
1.1	Background	1
1.1.1	Introduction	1
1.1.2	Implementation	1
1.1.3	Best practice guidance	2
1.1.4	Understanding the risk	2
1.1.5	Spill prevention practices	3
1.2	Emergency incident response	4
1.2.1	Overview	4
1.2.2	Incident response plan	4
1.2.3	The hierarchy of response	4
1.2.4	The event of a spill	5
1.3	References	6

Figures

Figure 1.1:	Pollution Control Hierarchy NetRegs (2018)	5
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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 a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd.
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 bp Alternative Energy investments Ltd. 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
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
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs

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 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’).

1.1.2 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 Lancashire County Council, Natural England, the Environment Agency and, in relation to the Project A intertidal works or, if applicable to the Project A offshore works, the MMO.

(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 must be followed in relation to that stage of the Project A onshore works.

1.1.2.3 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.

- 1.1.2.4 For onshore and intertidal works (landward of Mean Low Water Springs), 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 Best practice guidance

- 1.1.3.1 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), (CIRA 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/>).

1.1.4 Understanding the risk

Pollution sources

- 1.1.4.1 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.

1.1.5 Spill prevention practices

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

1.1.5.2 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'.

1.1.5.3 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.

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

1.2 Emergency incident response

1.2.1 Overview

1.2.1.1 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 final spillage and emergency response plan.

1.2.2 Incident response plan

1.2.2.1 An incident response plan will be provided in the final 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.

1.2.3 The hierarchy of response

1.2.3.1 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.

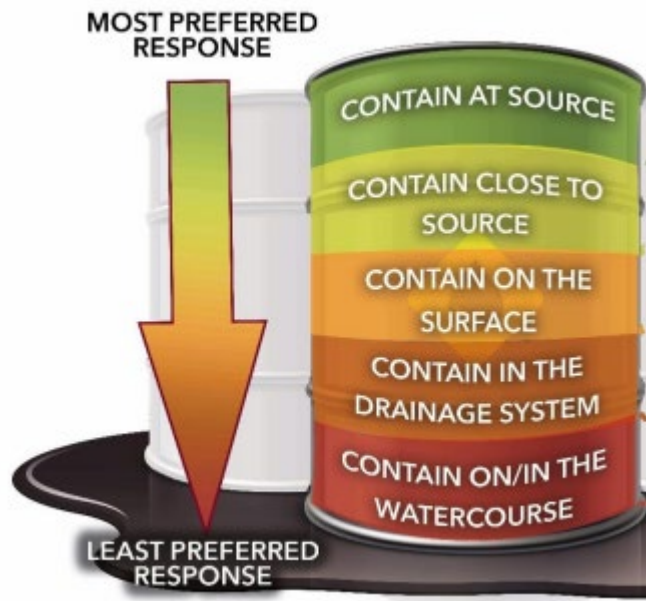


Figure 1.1: Pollution Control Hierarchy NetRegs (2018)

1.2.4 The event of a spill

1.2.4.1 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.

1.3 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