Southampton to London Pipeline Project

Deadline 6

Appendix A: Outline Emergency Action Plan (clean)

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Contents

1 Project Description

1.1.1 The Esso Petroleum Company, Limited (Esso) is making an application for development consent to replace 90km (56 miles) of an existing pipeline to transport aviation fuel between Boorley Green in Hampshire and the Esso West London Terminal storage facility in Hounslow. The replacement pipeline is 97km long taking into account that it cannot follow the line of the existing pipeline along its whole length due to new developments and environmental constraints.

1.1.2 Esso has already replaced 10km of pipeline between Hamble and Boorley Green in Hampshire. The replacement pipeline starts near Boorley Green at the end point of the previously replaced pipeline. The route runs generally in a northeast direction via Esso's Pumping Station in Alton. It terminates at the Esso West London Terminal storage facility. The areas of land to be permanently or temporarily used for the project are known as the Order Limits.

1.1.3 Works to install and commission the pipeline are expected to start from grant of Development Consent Order (DCO) and be completed by early 2023. Certain advance works may take place prior to development consent where consented under alternative regimes, for example, the Town and Country Planning Act 1990. On completion of the installation works the contractor would hydrotest the pipeline and any post-construction monitoring required would be carried out.

2 Purpose of Outline Emergency Action Plan

2.1.1 This outline Emergency Action Plan (EAP) includes procedures to be implemented in case of unplanned events to demonstrate how such events might be managed during installation. These include:

- flooding;
- pollution; and
- fire.

2.1.2 This plan is subject to the incorporation of the procedures of the contractor(s) and sub-contractor(s) that will deliver the work. The final plan will be in accordance with the procedures set out below.

2.1.3 This plan must be read in conjunction with the overarching Construction and Environmental Management Plan (CEMP) and its subsidiary plans, in particular the Water Management Plan (WMP) which outlines how measures have been incorporated into the design to manage flood risk and the risk of pollution to water.

3 Preparation and Prevention

3.1 Introduction

3.1.1 As a responsible operator, Esso is committed to safe operations that include those associated with the installation of pipelines.

3.1.2 Esso has an existing Emergency Preparedness Plan and Response Procedures that would support the Southampton to London Pipeline Project Emergency Action Plan.

3.1.3 The primary objectives in responding to any incident are as follows:

- preserve and protect life;
- prevent or mitigate damage to the environment; and
- prevent or mitigate losses to property.

3.2 Measures to reduce the risk of emergencies

Health and Safety

3.2.1 Esso operates its activities in accordance with the Health and Safety at Work Act 1974, and other health and safety legislation, such as The Pipeline Safety Regulations 1996. Site-specific methodologies and risk assessments would be produced in accordance with the current legislation prior to any activities taking place. These would identify potential risks, assess their likelihood and significance, then identify mitigation measures to reduce the risk.

3.2.2 Esso will ensure that adequate arrangements are in place to discharge its duties under the Construction (Design and Management) Regulations, 2015 (CDM Regulations).

3.2.3 The contractor(s) will be responsible for the production and implementation of the Project Health and Safety Plan in accordance with CDM regulations. This will set out how health and safety matters are managed, risks are identified and reduced in accordance with the current best practices and legal requirements. The Project Health and Safety Plan will provide a framework for the management of the health and safety of the contractor's staff and workforce and any visitors to the site and its compounds and members of the general public in the vicinity of construction activities.

3.2.4 The contractor will be regularly audited on its health and safety performance. All procedures and processes will be periodically reviewed internally by the contractor(s) and by Esso.

3.2.5 Task-specific method statements will include details of control measures required to manage the Health and Safety of staff involved in the task. These will also include environmental protection measures as appropriate to the task.

Flooding

3.2.6 Esso has made a number of good practice measures which would reduce the impacts of flooding, such as the identification of Flood Zone 3 and areas at risk of flooding from surface water (RoFSW), where they affect construction areas. All associated commitments would be included in the final Water Management Plan (WMP).

3.2.7 The commitments that relate to emergency incidents are listed in Table 3.1 and would be included in the final EAP.

Table 3.1 Project Good Practice Commitments on Flooding Relevant to the Outline EAP

Commitment Number	Commitment
G28	Construction workers would undergo training to increase their awareness of environmental issues. Topics would include but not be limited to: • dust management and control measures; • location and protection of sensitive environmental sites and features; • adherence to environmental buffer zones; • noise reduction measures; • working with potentially contaminated materials; • flood risk response actions; and • agreed traffic routes, access points etc.
G123	All works within or adjacent to watercourses would be carried out in accordance with the requirements of permits and licences agreed with either the Environment Agency or the relevant Local Lead Flood Authority or in accordance with the provisions of the DCO.
G124	All construction activities within Flood Zone 3 would be undertaken in a manner that reduces any significant increase in flood risk. This may include providing suitable breaks within spoil piles.
G127	The contractor(s) would subscribe to the Environment Agency's Floodline service which provides advance warning of potential local flooding events, and subscribe to the Met Office's Weather Warnings email alerts system and any other relevant flood warning information. The contractor(s) would implement a suitable flood risk action plan which would include appropriate evacuation procedures should a flood occur or be forecast.
G130	The Water Management Plan would set out the water mitigation and management measures and where they would need to be used. These measures would include, but not be restricted to, the following: • measures to segregate construction site runoff from natural catchment runoff; • details of measures to attenuate runoff rates before discharging at controlled rates to receiving watercourses; • details of mitigation measures for all work or compound areas located within flood risk areas; and • where construction activities would be located, preferably outside of the floodplain.
G198	The project would incorporate appropriate surface water drainage measures into its final design for the haul roads and access tracks so that they do not lead to a significant increase in flood risk.

Pollution

3.2.8 Pollution prevention design measures related to watercourses and groundwater, such as storage of chemicals and management of silty water, are included in the Outline Water Management Plan (WMP).

3.2.9 Esso has made a number of good practice commitments which would reduce the risk of pollution incidents. The commitments that would relate to emergency incidents are listed in Table 3.2 and would be included in the final EAP.

Table 3.2 Project Good Practice Commitments on Pollution Relevant to the Outline EAP

Commitment Number	Commitment
G122	For open cut watercourse crossings and installation of vehicle crossing points, mitigation measures would include to: • only use a 10m working width for open cut crossings of a main or ordinary watercourse whilst still ensuring safe working; • install a pollution boom downstream of the works; • use and maintain temporary lagoons, tanks, bunds, silt fences or silt screens as required; • have spill kits and straw bales readily available at all crossing points for downstream emergency use in the event of a pollution incident; • place all static plant such as pumps in appropriately sized spill trays; • prevent re-fuelling of any plant or vehicle within 15m of a watercourse; and • inspect all plant prior to work adjacent to watercourses for leaks of fuel or hydraulic fluids.
G142	Fuels, oils and chemicals would be stored responsibly, away from sensitive water receptors. They would be stored >15m from watercourses, ponds and groundwater dependent terrestrial ecosystems (GWDTE).
G144	As part of negotiations with landowners within the Order Limits which are affected by the project, active private water supplies (PWSs) would be identified with the landowner. Appropriate mitigation would be considered during construction.

3.2.10 There are design measures and good practice measures implemented as part of the detailed design and planning of the works which help to reduce the risk of pollution incidents. The project would also implement additional mitigation measures in or around sensitive receptors and is committed to ways of working around these to reduce risk, such as working in and around watercourses. These will be included in the final EAP.

Fire

3.2.11 Construction workers would undergo training to increase their awareness of Health, Safety and Environmental issues including fire risk.

3.2.12 Training would be provided on materials storage, the procedures for fighting fires, the use of appropriate fire extinguishers and site evacuation procedures.

3.2.13 General housekeeping on site would include proper storage and disposal of waste on site and designated smoking areas. Smoking would only be permitted in designated areas.

3.2.14 There would be no bonfires or burning on site.

3.2.15 Hot Works, such as welding and metal grinding, would be carried out under a Permit to Work system.

4 Incident Response

4.1.1 The final EAP will include incident response procedures that detail the roles and responsibilities that align with the delivery strategy for construction. They will also include the reporting procedures for environmental incidents as appropriate.

4.1.2 All site staff will receive site inductions which will cover the response and procedures for emergencies.

4.1.3 The incident response and procedures would be initiated in conjunction with Esso's Emergency Response Plan.

4.2 Flooding

4.2.1 The contractor(s) will subscribe to the Environment Agency's Floodline service which provides advance warning of potential local flooding events, and check weather forecasts.

4.2.2 In the event that a flood event is forecast, the project would implement a response proportionate to the event in the area at risk. These responses will be set out in the final EAP. This plan will include:

- evacuating personnel;
- briefing site staff on areas at risk;
- clearing areas at risk of personnel, vehicles and equipment;
- cancelling planned works in areas affected; and
- marking out areas that would remain clear of personnel, vehicles and equipment for the duration of the event.

4.3 Pollution

Response to pollution incident

4.3.1 In accordance with commitment G8, the final EAP would include proactive actions and measures to control pollution risks due to external factors such as extreme weather. Measures would include appropriate storage and handling of fuels and other substances hazardous to the environment.

4.3.2 In the event of a pollution incident, the project would implement a plan proportionate to the event in the area at risk. These responses will be set out in the final EAP. In general, the incident would be treated as follows:

- stop works;
- make area safe, i.e. use appropriate spill kit;
- contact Environmental Clerk of Works (ECoW) to provide initial assessment and advise on further action;
- deploy Emergency Response Crew if appropriate;

- as appropriate, contact relevant enforcing authority, i.e. Environment Agency for incidents affecting rivers, groundwater and major emissions to atmosphere; and
- inform works supervisor to initiate the formal reporting process.

4.3.3 In accordance with commitment W12, in the event of a pollution incident with the potential to affect Private Water Supplies (PWS) the following procedure would be in place:

- all landowners/tenants within 250m of the spill would be contacted within 24 hours to determine if there are any PWS that might be affected;
- an assessment of the likelihood of groundwater contamination supplying identified PWS would be undertaken;
- monitoring of nearby boreholes and well water would be undertaken for a determined period of time, taking into account pollution travel time in groundwater, to determine whether pollution has occurred; and
- where appropriate, an initial remediation plan would be discussed and agreed with the relevant regulatory authorities.

4.4 Fire

4.4.1 All staff will be briefed on the muster points (which will be clearly identified with signage) and procedures to follow in the event a fire is discovered.

4.4.2 In the event of a fire, site staff will:

- proceed to the assembly point; and
- dial 999 and ask for the appropriate emergency service.

4.5 Wider communication of incident

4.5.1 There will be a Community Engagement Plan integrated with the final Emergency Response Plan which will identify appropriate forums and the means for contacting potentially affected stakeholder groups, landowners and the relevant councils.

5 Roles and Responsibilities

5.1 Project Responsibilities

5.1.1 The contractor(s) organisational structure and the individual responsibilities for implementation of the measures at each stage of the project will be detailed in the final EAP. Initial examples have been provided for illustration in Table 5.1.

5.1.2 The responsibilities below do not supersede or replace statutory responsibilities of individuals in relation to Health and Safety or the environment. These roles and responsibilities will also be covered in the task-specific method statements for the works, where the appropriate names and contact details will be provided.

Table 5.1 Overall Roles and Responsibilities (Illustration only)

Roles	Responsibilities
Senior HSSE Lead	Responsible for all Health and Safety processes and procedures for the project.
Environmental Manager	The Environmental Manager would be responsible for the maintenance of all environmental plans and registers including ensuring that the environmental measures and mitigations are implemented on site and recorded within the Construction Environmental Management Plan (CEMP). The Environmental Manager would be the main point of contact with the Engineering Manager and the Communications Lead. They would also develop good working relationships with key stakeholders such as the Environment Agency, Natural England and the local authorities.
Environmental Clerk of Works (ECoW)	The ECoW would monitor that the works proceed in accordance with the relevant environmental requirements and commitments within the Development Consent Order and adhere to the required mitigation measures. The ECoW would be supported as necessary by appropriate specialists.
Communications Lead	The Communications Lead would be the point of contact for, and responsible for responding to, any engagement issues or complaints at any time when construction work is being undertaken.
First Aiders	Those identified in site inductions and method statements as people to contact in the event of minor injuries or incidents.