



# EAST PARK ENERGY

**East Park Energy**

EN010141

## Outline Operational Environmental Management Plan

**Document Reference: EN010141/DR/7.5**

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009: Regulation 5(2)(q)

**April 2026**

Version P02

# EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

## Outline Operational Environmental Management Plan

<b>APFP Regulation Reference:</b>	Regulation 5(2)(q)
<b>Planning Inspectorate Scheme Reference:</b>	EN010141
<b>Application Document Number:</b>	EN010141/DR/7.5
<b>Author:</b>	Axis PED Ltd

<b>Version</b>	<b>Date</b>	<b>Status</b>
P01	September 2025	DCO Submission
P02	April 2026	Deadline 1

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## 1.0 INTRODUCTION

### 1.1 Background

- 1.1.1 This outline Operational Environmental Management Plan (oOEMP) has been prepared for the operational Phase of the East Park Energy project ('the Scheme').
- 1.1.2 The Scheme is classified as a Nationally Significant Infrastructure Project (NSIP) and therefore BSSL Cambsbed 1 Ltd ('the Applicant') is applying for a Development Consent Order (DCO) to construct, operate and decommission the Scheme. The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), requiring an Environmental Impact Assessment ('EIA').
- 1.1.3 The purpose of this oOEMP is to set out how the necessary environmental mitigation and monitoring, identified as part of the EIA and set out in the Environmental Statement (ES), will be delivered during the operation of the Scheme.
- 1.1.4 This oOEMP is concerned with the operational phase of the Scheme, the following documents cover the separate construction and decommissioning phases:
- Construction phase – **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**; and
  - Decommissioning phase – **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]**.
- 1.1.5 If the DCO is granted, prior to the date of final commissioning for any phase of the Scheme this oOEMP will be developed into a final Operational Environmental Management Plan (OEMP) for that phase<sup>1</sup>. Any OEMP

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<sup>1</sup> As such, references to 'the OEMP' within this oOEMP should be considered as meaning any OEMP that is brought forward.

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brought forward will be substantially in accordance with this oOEMP as set out by a Requirement of the **draft DCO [EN010141/DR/3.1]** and submitted to and approved by the relevant Local Planning Authority (LPA).

- 1.1.6 Nothing in this oOEMP will prevent the modification or omission of the control measures set out in section 4 and 5 where the methodology means that the measures can be so modified or omitted. This will be confirmed (including confirming that the absence or change to such control measures will not lead to any materially new or materially different effects which are worse than those reported in the ES) at the time of submission of the final OEMP for approval.

## 1.2 Document Structure

- 1.2.1 This oOEMP is structured as follows:

- **Introduction** – provides an introduction to the document and defines the structure of the oOEMP;
- **Scheme Description** – provides a summary of the Site and site context, a description of the Scheme, and sets out a summary of the expected operational activities;
- **Roles & Responsibilities** – sets out the roles and responsibilities that will need to be defined at the operational phase, and identifies stakeholders relevant to the environmental management of the operational phase;
- **Operational Environmental Management** – sets out principles and site rules to be applied in the operation of the Scheme, and how communication with third parties will be undertaken during operation;
- **Environmental Mitigation Measures** – sets out the environmental management and mitigation measures that are required to address the effects of the Scheme during the operational phase, as relied on or identified in the ES;
- **Implementation of Management Plan** – provides a summary of the key measures that must be within the final OEMP to ensure successful implementation of the final OEMP; and

- **Monitoring and Maintenance** – sets out the procedures for monitoring and ensuring compliance with the OEMP, as well as requirements for record keeping.

### 1.3 Relationship with Other Management Plans

1.3.1 This oOEMP is part of a framework of environmental management documents that will be implemented during the operational phase of the Scheme. The final OEMP will work alongside several other specific management plans, which provide further details on mitigation and management measures.

1.3.2 The following will be developed separately to the final OEMP, pursuant to DCO Requirements:

- **Surface Water Management Plan (SWMP):** This plan will detail site-wide measures for drainage, rainfall runoff management, including flood risk mitigation and the containment of firewater runoff from the Battery Energy Storage System (BESS).
- **Public Rights of Way Management Plan (PRoWMP):** This plan will ensure the maintenance of existing PRoWs, the implementation of new permissive paths, and the provision of wayfinding signage to guide public access across the Site.
- **Landscape and Ecology Management Plan (LEMP):** This plan will set out measures for landscape planting, habitat management, and biodiversity net gain, ensuring that mitigation planting and screening vegetation are effectively maintained.
- **Battery Safety Management Plan (BSMP):** To outline fire safety, containment measures, and emergency response procedures for the BESS system during its operation. This will be accompanied by an Emergency Response Plan.
- **Soil Management Plan (SMP):** This plan will ensure the sustainable management of soils and materials by setting out strategies for handling, storage, reuse, and disposal, minimising waste, preventing contamination,

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and protecting soil health throughout the construction, operation, and decommissioning phases of the project.

- **Skills, Supply Chain and Employment Plan (SSCEP):** This plan will ensure local economic benefits by setting out strategies for local job creation, workforce training, and engagement with regional suppliers throughout the construction, operation, and decommissioning phases of the Scheme.
- **Archaeological Mitigation Strategy:** This document will present the approach to the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. It sets out how the mitigation measures and monitoring requirements will be implemented during construction and has been prepared with the objective of compliance with relevant legislation and policy.
- **Heritage Enhancement Strategy:** This document sets out the measures that will be adopted to increase the ability to understand, appreciate and experience buried heritage assets at the Site.

1.3.3 The following plans will form part of the final OEMP, or be submitted alongside it:

- **Invasive Non-Native Species Management Plan (INNSMP):** This plan will outline monitoring and control measures for invasive species, ensuring that any non-native species identified at the Site are effectively managed to protect biodiversity.
- **Environmental Incident Management and Pollution Prevention Plan (EIMP):** This plan will provide a structured response framework for fuel or chemical spills, unexpected contamination events, and pollution control measures to prevent impacts on watercourses and groundwater.
- **Unexpected Contamination Protocol (UCP):** If unexpected contamination is encountered during operation, this protocol will detail the procedures for risk assessment, reporting, remediation and verification.

- **Flood Warning and Evacuation Plan (FWEP):** This plan will set out flood preparedness measures, warning systems, and emergency response actions in the event of extreme weather-related flooding.
- **Waste Management Plan (WMP):** This plan will set out procedures for the management of operational waste, ensuring compliance with the Waste Hierarchy and regulatory requirements.

1.3.4 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly by the Site Manager, Environmental Manager, and relevant regulatory authorities. Monitoring results will be documented as part of the compliance framework for the operational phase.

1.3.5 If the DCO is granted, each of the above plans will be developed into a final document prior to the date of final commissioning for any phase of the authorised development, with approval by the relevant LPA (following consultation with the relevant bodies on each plan as set out in the DCO).

1.3.6 The final OEMP and the associated management plans will be reviewed and updated periodically to ensure continued compliance with regulatory requirements and best practice standards.

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## 2.0 SCHEME DESCRIPTION

### 2.1 The Scheme

- 2.1.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.
- 2.1.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity to the National Grid, as well as the storage of up to 100 MW of electricity in the BESS.
- 2.1.3 A more detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

### 2.2 The Site

- 2.2.1 The Site is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council and Huntingdonshire District Council. The site location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**.
- 2.2.2 The Site area extends to approximately 773 hectares (ha) . The Site includes all land for the solar development, BESS, landscaping, cabling, access and grid connection.
- 2.2.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

2.2.4 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection** – Site D to Eaton Socon Substation – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

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## 2.3 Site Context

- 2.3.1 The Site is located on the south side of a broad shallow clay vale landform formed by a number of west-east tributaries to the River Great Ouse, which flows north-south to the east of the Site through the town of St Neots approximately 3.7km east of Site D.
- 2.3.2 The local landscape is generally more undulating than the Site which is located predominantly in a low-lying area with relatively limited topographic variation. The landform rises to the north of the Site towards Grafham Water, to the west of the Site towards a ridgeline beyond Swineshead, and to the south of the Site towards a high point around the Bedford Aerodrome.
- 2.3.3 The landscape pattern of the local area is broadly consistent, comprising medium- to large-scale arable farmland interspersed with blocks of woodland, particularly in the more elevated parts of the landscape to the north of the Site.
- 2.3.4 The local settlement pattern is dispersed and typically rural in character comprising occasional distinct village settlements. From west to east the principal settlements in closest proximity to the Site are Swineshead, Pertenhall, Keysoe, Keysoe Row, Little Staughton, Great Staughton, Hail Weston, and Duloe. The town of St Neots lies east of the A1 to the east of the Site and is the largest settlement local to the Site. Outside of the settlements there are occasional individual properties and farmsteads including some in close proximity to the Site. The following properties lie 'inset' within the Order Limits, in that they are excluded from the Order Limits but surrounded by the Site:
- Lodge Farm, a residential property with associated equestrian land uses inset within Site B to the north-west of Little Staughton; and
  - The Kangaroo, a former public house which is now a residential property and dog kennels inset within Site B at the junction between Little Staughton Road and Staughton Road.

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- 2.3.5 Neither the Order Limits nor the surrounding area are covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The Order Limits are also not within any locally designated (non-statutory) landscapes.
- 2.3.6 There are no statutory nature conservation designations within the Order Limits. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. The closest 'European site' (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Order Limits, to the north-west. Further detail on nature conservation designations is set out within **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**.
- 2.3.7 The following non-statutory nature conservation designations are adjacent to the Site:
- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
  - Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.
- 2.3.8 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme has discovered the site of a Roman Town in Site C. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to designate the area as a Scheduled Monument. The application was accepted and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.
- 2.3.9 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe,

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Swineshead, Little Staughton, Great Staughton and Duloe. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary. The Order Limits are not covered by any conservation areas.

- 2.3.10 The Order Limits are located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west through Site A; with an unnamed watercourse through Site B; and with the River Kym to the north of Site C.
- 2.3.11 The Order Limits are crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

## 2.4 Operational Activities

- 2.4.1 Subject to the Scheme securing a Development Consent Order it is anticipated that the operational phase would start no earlier than mid-2030 (following the completion of construction). The Scheme would then operate for approximately 40 years, with decommissioning assumed to be no earlier than 2070.

### Operational Workforce and Activities

- 2.4.2 During the operational phase, access to the Site would principally be to the East Park BESS and Substation, and to the wider site for routine maintenance operations, replacement of equipment, habitat management, and farming activities. It is expected that there would be 20 full time equivalent (FTE) roles for the Scheme during the operational phase covering the various activities, this would breakdown broadly as twelve FTE roles working on site maintenance, five FTE roles working in management and administrative roles,

and three FTE roles working in land management including landscape maintenance and agriculture.

2.4.3 At times when significant replacement campaigns are required, e.g. large-scale replacement of solar PV array areas, or multiple transformer or battery storage units, then more staff and specialist equipment (cranes and low loaders) would be required. Table 2-1 below sets out assumptions regarding the operational lifespan of key individual components of the Scheme.

**Table 2.1: Indicative Operational Lifespan of Scheme Components**

Scheme Component	Indicative Operational Lifespan
Solar Panels	20 – 40 years (a single replacement per installed panel and 10% contingency is assumed)
Mounting Structures	40 years
String Inverter	20 years
Centralised Inverter	20 years
Solar Transformer	20 – 40 years
Battery Storage Unit	20 years
Battery Transformer	20 – 40 years
Auxiliary Transformer	20 – 40 years
400 kV / 33kV Transformers	40 years
Cabling	40 years (20% replacement anticipated due to defects)
Fencing	10 – 20 years
CCTV	10 – 20 years

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- 2.4.4 Maintenance access to the Site would be by a small van or similar and the storage, operations and maintenance building would contain spare equipment and tools for routine repairs and maintenance. Operational access would be via the existing public highway with limited traffic movements expected.
- 2.4.5 Along the cable corridors activity will comprise routine inspections and any reactive maintenance, for instance where a cable has become damaged.
- 2.4.6 The on-site substation (set within the Scheme) will be managed and maintained by the operator of the site. Eaton Socon Substation will be managed and maintained by National Grid.

### **Periodic Replacements**

- 2.4.7 As set out above, during the operational phase of the Scheme, periodic replacement of equipment will be necessary to maintain operational efficiency and reliability.
- 2.4.8 Routine inspections and assessments will be conducted to determine the condition and performance of solar panels, solar balance of plant, battery storage units, and other associated infrastructure set out in Table 2-1. Equipment identified as reaching the end of its functional lifespan or showing reduced operational performance will be scheduled for replacement.
- 2.4.9 Given that replacement activities will not be a frequent occurrence; large scale replacement activities will not form part of the routine operation of the Scheme. The characteristics of the Site mean that impacts (including to highways) from replacement activities will be limited and can be controlled predominantly by the measures set out in this oOEMP. As such it is not proposed that the final OEMP submitted for approval will include details of specific measures to be put in place for large scale replacement activities.

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2.4.10 Instead, the OEMP will provide that, prior to any replacement activities which involve replacement of more than 20%<sup>2</sup> of the solar panels within the Scheme within any 12 month period, a notification must be submitted to the relevant LPA for approval with details of the management measures that are proposed to be put in place for those replacement activities, that are consistent with the principles of the CEMP, PRowMP, CTMP and OEMP that had been approved for the construction for the Scheme, but are also commensurate to the scale of activity proposed.

### **Panel Cleaning**

2.4.11 Solar PV panels generally require little maintenance, as natural weather conditions help keep them clean. Any reduction in efficiency due to dust or dirt accumulation is usually negligible, however, site-specific conditions can influence the need for cleaning.

2.4.12 Since performance loss from dust and dirt accumulation is typically low, the decision to clean panels must be balanced against operational costs, with annual cleaning generally not considered cost-effective. It is therefore assumed as a precautionary worst-case scenario that the panels will be cleaned on a biennial basis. The precise cleaning requirements will however only become clear once the Scheme is operational, and it is reasonably likely that this requirement will be less frequent than a biennial basis.

2.4.13 Although cleaning technologies are advancing, it is currently assumed that a tractor mounted system would be used, as this is the most commonly used method. A tractor mounted system features a soft rotating brush, similar to those found in car washes.

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<sup>2</sup> Given the conclusions of the construction assessments for the Scheme and that replacement activities will cause less effects this is considered to be a reasonable figure for replacement activities to be considered 'large scale' such that they may require the identification of more extensive management measures.

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- 2.4.14 Where panel cleaning is required during the operational phase, this will be undertaken using water and mechanical brushing only. No chemical cleaning agents will be used for panel cleaning.
- 2.4.15 To prevent damage, cleaning will typically take place at night or when the panels are cool, reducing the risk of damage to the panels. If undertaken at night, the process will be illuminated using tractor-mounted lights, similar to those used in night-time agricultural work.

### **Vehicular Access**

- 2.4.16 There would be maintenance vehicles retained onsite, most likely tractors, trailers and bulk tankers, along with smaller light goods vehicles (LGVs). These would be used to transport spare components, tools and equipment around the Site, and to undertake landscape maintenance and solar PV module cleaning. These would be stored at the operations / spares building within Site D, or within the operations building store area.
- 2.4.17 There would be no requirement for any regular heavy good vehicle (HGV) access, with the vast majority of the routine maintenance, and associated deliveries, undertaken by LGV.

### **Public Rights of Way**

- 2.4.18 During the operational phase all existing PRoW would be maintained on their existing alignment, and it is not expected that any diversions or stopping-up of PRoW is required. The **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** describes how the PRoW within the Order Limits, and newly created permissive paths, would be managed over the lifetime of the Scheme.

### **Vegetation Management**

- 2.4.19 A range of different habitat and land management prescriptions would be required to deliver the landscape outcomes envisaged for the Scheme. These are set out within the **outline Landscape and Ecological Management Plan**

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(oLEMP) [EN010141/DR/7.7] which supports the application. Post-consent, this outline plan will be developed into a final plan which must be in substantial accordance with the outline and will require approval by the Local Authorities. The Scheme must be operated in accordance with the approved plan. This is secured via a Requirement in Schedule 2 of the **draft DCO** [EN010141/DR/3.1].

2.4.20 The oLEMP [EN010141/DR/7.7] sets out the management prescriptions and target habitat conditions for the various landscape features proposed. Monitoring processes are also prescribed to record the progress of establishing target habitats and implement remedial measures. This ensures that the habitats created and managed will meet the target condition set out in the oLEMP [EN010141/DR/7.7].

2.4.21 Activity within the Site during the operational phase will be limited, and will principally involve equipment maintenance and servicing, replacement and renewal of any components that fail, monitoring, and vegetation & landscape management. For the latter, this would be in line with the oLEMP [EN010141/DR/7.7]. The maintenance and servicing activity is expected to comprise inspection of equipment, servicing, removal, replacement, and reconstruction or refurbishing of faulty equipment to ensure effective operation of the Scheme.

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## 3.0 ROLES & RESPONSIBILITIES

### 3.1 Site Team

3.1.1 The following are key Site roles during the operational phase that would have responsibility for management of environmental impacts, with responsibilities for each role are also set out (this list is not definitive and additional roles & responsibilities may be added to the final OEMP):

- **Site Manager** – The Scheme Owner/Operator will identify a Site Manager who will have overall responsibility for implementation of the OEMP and all other DCO and legislative requirements.
- **Quality Manager** – The Quality Manager will have responsibility for quality assurance and compliance, document management and record keeping, inspections for quality control, management of risks, and process improvement related to quality control and assurance. For the OEMP they would have responsibility for quality assurance of procedures and for management of documentation, records, and monitoring of the systems relating to the same.
- **Health and Safety Manager** – responsible for the monitoring and control of health and safety, and rules and regulations arising.
- **Environmental Manager** – The Environmental Manager has responsibility for management of environmental matters related to the operational phase of the Scheme, including ensuring compliance with legislation, ensuring that mitigation, management and monitoring measures are implemented, and that best practice is applied during works. The Environmental Manager will be a point of contact with environmental bodies and other third parties as required to perform their duties.
- **Environmental Clerk of Works** – The Environmental Clerk of Works (ECoW) will be a suitably qualified environmental manager responsible for on-site management and monitoring of environmental impacts including for soil management, pollution control, noise and dust monitoring, and surface water.

- **Ecological Clerk of Works** – The Ecological Clerk of Works (EcoCoW) will be a suitably qualified ecologist responsible for on-site managing and monitoring of the works in relation to habitats, protected species, and other wildlife.
- **Flood Warden** – The Flood Warden will be responsible for preparation, management, and response to flood incidents, inclusive of reacting to flood warnings and alerts.
- **Community Liaison Officer** – The Community Liaison Officer will ensure that the Community Liaison Group (CLG) is established and will be the point of contact for the CLG, ensuring that regular updates are issued during the operation of the Scheme.

3.1.2 These roles and responsibilities are indicative and will be confirmed in the final OEMP.

## 3.2 Stakeholders

### Community Liaison Group

3.2.1 A CLG will be formed prior to construction (per the oCEMP) and will continue through its operations until ultimate decommissioning of the Scheme.

3.2.2 During the operational phase, the purpose of the CLG will be to allow interested community members and bodies to be regularly updated on maintenance and other such activities. Regular meetings will be held with the CLG where the Community Liaison Officer will provide updates on upcoming and current work taking place on site, any changes that may occur (e.g. due to unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). The CLG will allow local residents to raise issues with the Community Liaison Officer and to act as a forum to discuss relevant issues for the operation of the Scheme. Membership will be open to the following non-exhaustive groups:

- Parish Councils;
- Local Businesses; and

- Local Community Groups.

### **Stakeholders**

3.2.3 The following stakeholders (or any successor body) will be engaged during operation of the Scheme where activity is relevant to their area of responsibility:

- Bedford Borough Council;
- Huntingdonshire District Council;
- Cambridgeshire County Council;
- Environment Agency;
- Natural England; and
- Historic England.

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## 4.0 OPERATIONAL ENVIRONMENTAL MANAGEMENT

4.1.1 This section of the oOEMP sets out the general principles and control measures that will be employed on Site during the operational phase, which are applicable to all aspects of the Scheme.

### Operational Hours of Work

4.1.2 The Scheme would operate 24/7, with the solar farm generating electricity during daylight hours, and the BESS with the potential to operate overnight.

4.1.3 During the operational phase, maintenance activities will generally be limited to from 08:00 to 18:00hrs Monday to Friday and from 08:00 to 13:00hrs Saturday, with no work on Sundays or Bank Holidays.

4.1.4 There may be occasional instances where operations are required outside the above times e.g. for emergency repairs or for panel cleaning (covered further below).

4.1.5 In such instances, it may be necessary to notify the relevant LPA of the planned modification to the working hours.

### Site Security

4.1.6 The Site will be secured during operation by the security fencing surrounding the site which will remain in-situ throughout the period of operation of the Scheme. All plant and materials will be secured to prevent theft or vandalism. The Site will be monitored through CCTV and other monitoring systems (e.g. weather stations), which will allow monitoring of the site to identify security or other similar issues and reaction to the same.

4.1.7 The security fencing and CCTV & monitoring systems will be regularly inspected to ensure that they are in a good state of repair and operating properly. Where issues are found they will be swiftly rectified.

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## Protection of the Public

- 4.1.8 When maintenance, repair, or replacement activity takes place in addition to the responsibilities set out under Construction (Design and Management) Regulations 2015 (or any subsequent equivalent legislation), the Site Manager will be alert to the risk of works being accessed by unauthorised members of the public and will ensure that site security is maintained at a high standard across the Site to ensure that the risk of access by trespassers is minimised.
- 4.1.9 A high standard of ‘housekeeping’ will also be maintained across the site to reduce risks to trespassers in the event that they do gain access to the site. The storage, operations and maintenance building will be fully secured, and all materials, equipment, and plant will be fully secured when not in use, and in particular at the end of each working day.
- 4.1.10 Where public rights of way cross the Site or interact with operational activity (e.g. vegetation maintenance activity or where they cross access roads) then activity will be suitably managed to protect the public.
- 4.1.11 An **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** has been prepared and submitted with the application. This document sets out the principles by which PRow would be managed during the construction and operational phases. Post-consent, this outline plan will be developed into a full plan which must be in substantial accordance with the outline and will require approval by the relevant LPAs.

## Management of Vegetation and Planting

- 4.1.12 An **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]** has been prepared and submitted with the application. This provides a framework for the delivery of the landscape strategy and the successful establishment and management of the landscape works proposed as part of the Scheme through short and long-term measures for the establishment, monitoring, and management of the measures it covers. This

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ensures that the landscaping measures and the ecological mitigation and enhancement measures that have been integrated into the Scheme will be successfully delivered.

- 4.1.13 If the DCO is granted, the oLEMP will be developed into a final Landscape and Ecological Management Plan (LEMP) prior to commencing construction of the relevant phase. The final LEMP will be in substantial accordance with the oLEMP, as secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.
- 4.1.14 The LEMP will operate alongside the final OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

### **Management of Agricultural Inputs and Protection of Groundwater**

- 4.1.15 Farming and land management activities undertaken during operation (including any agricultural production associated with the Agrisolar Research Area) will be planned and managed to avoid introducing contaminants to groundwater. Land within the Order Limits will generally be managed as grassland and grazing in accordance with the approved LEMP, which avoids the need for routine agricultural chemical inputs.
- 4.1.16 Where the use of herbicides is required for targeted weed control, establishment of planting, or research purposes, non-chemical methods will be used in preference and any chemical use will be limited to the minimum practicable quantity. Any herbicide use will follow the approach set out in the oLEMP, including that herbicides will not be used within 10 metres of watercourses, ditches or ponds.
- 4.1.17 All herbicides brought onto the Site will be stored securely in sealed containers within bunded areas. A register will be maintained of any herbicide storage and use, including the product, quantity, location, date and weather conditions, and this will be made available to the Environment Agency on

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request. Any spill or suspected pollution incident involving agricultural chemicals will be managed and reported in accordance with the Environmental Incident Management and Pollution Prevention Plan referred

- 4.1.18 Other than limited herbicide use for localised and targeted weed control, no pesticides (including insecticides or fungicides) will be used during the establishment or ongoing management of the Scheme.

### Signage

- 4.1.19 Within the Site and at access points, signage will be erected setting out required conduct within the Site's boundaries (e.g. speed limits, warning of possible hazards etc.). Signage will also be erected at any point where an access road crosses or meets a PRow or a similar route to advise Site Operatives of the risk of pedestrians or other non-motorised traffic being present.
- 4.1.20 Signage will be affixed to site fencing at regular intervals indicating that the operational parts of the site may not be accessed by the public and setting out the risks of entry. Signage will be inspected at regular intervals and maintained or replaced as necessary to ensure visibility, legibility, and continued good working order.
- 4.1.21 Where necessary, and to ensure the safety of the public and site operatives, temporary signage may be erected along the PRow and permissive paths to warn users of planned or ongoing maintenance works.

### Inductions

- 4.1.22 All site visitors and new site operatives will be directed in the first instance to Storage, Operations and Maintenance Building where they will be required to sign in and undergo a suitable induction.
- 4.1.23 Inductions will be completed as appropriate for the role and in accordance with best practice approaches prior to commencing work or visiting site. Records of inductions and competencies will be held on site.

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- 4.1.24 Risk assessments and methods statements will be produced for all activities and they will be site-specific. Operatives will be briefed on method statements and risk assessments relevant to their work prior to commencing work. Copies of the risk assessments and method statements will be held on site and will be available for use and inspection.
- 4.1.25 Operatives and visitors will be required to sign in and out every day.

### **Deliveries & Collection**

- 4.1.26 Parking will be provided for staff and visitors at the operations and maintenance area, and this area will be retained for use for these purposes throughout the operation of the Scheme.
- 4.1.27 Deliveries and collections of material from the site will be from the operations and maintenance area except where the nature of maintenance/repair activity requires that materials are best delivered to or collected from the area of work. Drivers will be required to report to the storage, operations and maintenance building during working hours. When the site is not open for deliveries & collections, delivery/collection vehicles will not be permitted to circulate, queue, or wait on the public highway.

### **Health & Safety**

- 4.1.28 The requirement for comprehensive health and safety assessments is an essential part of any business activity. A Health & Safety Plan will be produced as part of the OEMP.
- 4.1.29 Regular meetings will be held between the Site Owner/Operator, Site Manager, and Health and Safety Manager to review matters related to health & safety. The Health and Safety Manager will ensure that they or a suitably qualified member of their organisation regularly visits the site to monitor health & safety matters. Monitoring reports will be produced and provided after these visits.

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- 4.1.30 Reportable accidents and dangerous occurrences will be reported in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (as amended) (RIDDOR), or any successor legislation in force at the time of operation of the Scheme.
- 4.1.31 In line with other requirements in this section, appropriately licenced contractors will be appointed to undertake work, a safe system of working established prior to commencement of works, and Personal Protective Equipment (PPE)/Respiratory Protective Equipment (RPE) suitable for the tasks must be worn by operatives.

### **Contamination and Pollution**

- 4.1.32 Should a pollution incident occur, detailed records of the incident will be made and the relevant external organisations would be promptly contacted in accordance with an agreed Environmental Incident Management and Pollution Prevention Plan as part of, or accompanying the final OEMP.
- 4.1.33 All accidents, incidents and near misses (including spills, dust, noise pollution etc.) will be reported to the Site Manager immediately. These will be recorded and investigated as appropriate. Details to be recorded will include: a description of the incident, potential contributory causes, adverse effects, measures implemented to mitigate adverse effects, and effectiveness of measures implemented to prevent incidents happening again.

### **Welfare Provision**

- 4.1.34 The storage, operations and maintenance building will include welfare facilities and is expected to meet the needs of operatives present on site for the majority of activities. Where maintenance, repair, or other such work is taking place at a distance from the storage, operations and maintenance building it may be necessary to provide temporary facilities for welfare. If so, these will be fit for purpose, and at minimum will include toilet facilities and welfare facilities that store foul/wastewater. These will then be collected/emptied by specialist licenced contractors.

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## Lighting

- 4.1.35 During operation no part of the Scheme will be continuously lit as this will not be required for its operation.
- 4.1.36 The East Park Substation will require artificial lighting in order to provide security and ensure the health and safety of those working on the site. However, this will be designed and sited to minimise impacts on human and ecological receptors, and would generally only be required at night or during low light levels. The lighting will be manually operated and will not be on when staff are not working in the substation. Planned maintenance of the substation will take place in daytime hours, thus limiting the need to use lighting for unplanned maintenance or to address site-specific safety or security matters.
- 4.1.37 In other parts of the Site, temporary mobile lighting may be required during maintenance activities during winter months, or during periods where unexpected work must occur. This is not expected to be a regular occurrence. Lighting will be operated to minimise impacts on human and ecological receptors, and would generally not be operated outside of the specified working hours. Lighting will utilise directional fittings to minimise outward light spill and glare.
- 4.1.38 As set out in Section 2.4 of this oOEMP, the solar PV panels will be cleaned at night using a tractor-mounted system. The tractor will utilise headlights and a spotlight whilst driving up and down each row, which is similar to that used during night-time arable harvest operations that currently take place across the east of the site.

## Utilities

- 4.1.39 Due to the nature of the Scheme, it is not anticipated there would be any works that could affect below ground utility infrastructure during the operational phase. However, should maintenance works require excavations, measures in relation to safe working near buried utilities will be in place and detailed in the final OEMP.

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4.1.40 The **draft DCO [EN010141/APP/3.1]** includes protective provisions for the protection of existing utilities.

### **Emergencies, Fire Plan, and Special Site Instructions**

4.1.41 Emergency planning will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire and rescue service, as well as the Environment Agency in relation to responding to flood warnings and events.

4.1.42 An Emergency Response Plan will detail the procedures for responding to incidents and emergencies on site, and any reporting arising from them.

4.1.43 A notice displaying emergency contact details will be displayed in a prominent location onsite – such as within the storage, operations and maintenance building. External notices providing emergency contact details will be placed at prominent locations around the perimeter of the Site.

4.1.44 At site induction all personnel must be advised of the firefighting equipment on site and the escape routes and procedures.

### **Certification of Mobile Plant**

4.1.45 All plant will have the appropriate certification and checks with copies held on file on site. All plant will be regularly inspected, and records of these inspections will be held on file on site.

### **Waste management**

4.1.46 The waste hierarchy must be applied by any person who produces, keeps or manages waste per the duty set out in the Waste (England and Wales) Regulations 2011. The waste hierarchy requires any person managing waste to first consider waste prevention, then preparing material for re-use or recycling, and only then use waste recovery methods (i.e. firstly energy recovery), and then waste disposal as the last option. Thus, the waste

hierarchy must be applied when managing the operational phase of the Scheme.

4.1.47 Detail of measures to minimise, re-use, and control waste are set out later in this document and will be detailed in the final OEMP prior to the date of final commissioning for any phase of the authorised development. However, briefly, these will as a minimum include:

- Take all reasonable steps to minimise the volume of waste generated by the operational phase of the Scheme (e.g. reduce and re-use);
- Separate main waste streams on the site and segregate them to maximise opportunities of re-use and recycling; and,
- Where waste is to be removed from the site to a waste facility then fully licenced waste carriers will be used and waste will be taken to licenced facilities.

### Surface water management

4.1.48 An **outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]** has been submitted with the application, which sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. It also details measures for management of fire water run off in the event of a fire at the BESS. If the DCO is granted, the oSWMP will be developed into a final Surface Water Management Plan (SWMP) once a contractor is appointed. The SWMP will be in substantial accordance with the oSWMP, as secured by a Requirement of the **draft DCO [EN010141/DR/3.1]**, for submission and approval by the relevant LPAs prior to commencement of construction.

4.1.49 The final SWMP sets out the proposed management measures for surface water quality and management of surface water (including the rate and volume of surface water run off during operation). It will apply the same principles and approach set out in the oSWMP.

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4.1.50 The SWMP will operate alongside the final OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

### Flood risk

4.1.51 Limited sections of the Site are subject to fluvial flood risk, with critical infrastructure placed outside of those areas. However, there is some risk of pluvial flooding in parts of the site from surface water and smaller watercourses. The Scheme has been designed to account for those risks as set out in **ES Vol 1 Chapter 8 Hydrology and Flood Risk [EN010141/DR/6.1]** and the Flood Risk Assessment at **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**.

4.1.52 To manage the residual risk of flooding to site operatives a Flood Warning and Evacuation Plan will be developed and a Flood Warden will be appointed, who will be familiar with the Site, and will ensure that operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event. The Flood Warden will liaise with the Environment Agency to receive appropriate flood warnings in advance of any potential flood event.

### Liaison with Public

4.1.53 Neighbouring residents will be actively informed about any substantial maintenance, repair, or replacement work on the Site throughout the duration of the operational phase of the Scheme via the CLG. Regular communications will be sent to them to provide updates on such work, any changes that may occur (e.g. due unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). These will also include details of a contact telephone number and the project website.

4.1.54 A contact telephone number will be maintained throughout the operation of the Scheme (including an outside of working hours [out of hours] number for use if required) to allow members of the public, local businesses, and other

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such parties to make enquiries or raise a complaint. The telephone number provided to local residents and businesses will be maintained at all times during the operational phase in order to respond to any enquiries and complaints.

4.1.55 A project website will be maintained throughout the operation of the Scheme to allow members of the public, local businesses, and other such parties to view updates on the Scheme, make enquiries or raise a complaint. The project website will be maintained at all times whilst the Scheme is in operation in order to respond to any enquiries and complaints.

4.1.56 Any complaints arising from the site during the operational phase will be addressed by the Site Manager. A Complaints Register will be maintained, and this will include the following:

- Complainant's details.
- Date and time of the complaint.
- Cause(s) of the complaint.
- Action taken to resolve the complaint, and date and time of the same, or reasons for any unresolved complaints (including where no issue is found).

4.1.57 The Complaints Register will be regularly reviewed as part of monitoring of the final OEMP to ensure that it is being followed, that any issues are identified, and to monitor compliance with its Management and Mitigation Measures.

### **Best practice measures**

4.1.58 The Considerate Constructors Scheme (CCS), or equivalent at the time of operational phase of the Scheme, will be adopted for the Scheme for relevant repair or replacement activity. This standard includes best practice measures that go beyond statutory compliance and thus will further reduce pollution and nuisance from the Scheme.

## Monitoring & Implementation Arrangements

- 4.1.59 The Site Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions noted in the final OEMP are undertaken. Detail of general monitoring requirements are set out later in this document.

## 5.0 ENVIRONMENTAL MITIGATION MEASURES

5.1.1 The following tables set out outline mitigation and management measures that would, as a minimum, form part of the OEMP. These have been prepared using the details set out in the ES of required measures for each topic. These measures would be secured in the final OEMP, which would be prepared by the Site Operator (or a suitable person nominated by them) prior to the date of final commissioning for any phase of the authorised development, which is secured as a Requirement of the DCO.

**Table 5.1: Summary of the operational mitigation and management measures – Landscape and visual**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Potential loss of vegetation due to maintenance activities	The <b>outline Landscape and Ecology Management Plan (oLEMP) [EN010153/DR/7.7]</b> establishes measures to protect and maintain existing vegetation, ensuring that retained vegetation is safeguarded throughout the operational phase.	Regular surveys to assess vegetation health and compliance with the oLEMP.  Records will be kept of any vegetation loss and replanting efforts.
	Any vegetation losses or failure of plants to establish will be replaced in line with the oLEMP and the requirements of the DCO.	
	Routine vegetation management, including hedgerow and tree maintenance, will be conducted to preserve screening effectiveness.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Visual impact of the development from surrounding areas	In accordance with the oLEMP: <ul style="list-style-type: none"> <li>• Existing landscape features such as hedgerows and woodland belts will be retained and enhanced to provide natural screening.</li> <li>• New planting of trees and hedgerows will be carried out where additional screening is required.</li> <li>• Maintenance of screening vegetation to ensure continued effectiveness.</li> </ul>	Visual inspections from key viewpoints to confirm the effectiveness of screening.  Adaptive planting strategies to reinforce screening where necessary.
Glint and glare from solar panels	Solar PV panels will be fitted with anti-reflective coatings to reduce glint and glare.  Mature planting / mesh fencing will be used to mitigate residual glare effects.	Review of any complaints related to glare and adjustments made if necessary.
Impact of temporary site lighting during maintenance activities or periodic replacements	Lighting will be designed to minimise light spill, using directional fittings and low-intensity lamps where possible.  Mobile lighting will only be used when essential for safety and will be turned off when not required.  Maintenance activities requiring lighting will be scheduled during daylight hours where feasible.  CCTV will use infra-red technology to minimise potential impacts from lighting.	Monitoring of temporary lighting use to ensure compliance with best practices.
Effects on users of Public Rights of Way during operational maintenance,	An <b>outline Public Right of Way Management Plan [EN010153/DR/7.8]</b> has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction in accordance with a Requirement of the <b>draft DCO [EN010153/DR/3.1]</b> .	Regular inspections of PRoW routes within the site.

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
including for periodic replacements	The measures agreed in the final Public Right of Way Management Plan will be implemented if required during the operational phase as part of any periodic replacement.	Monitoring of public feedback regarding accessibility and signage quality.
	Signage and interpretation boards will be installed to provide information about the site and its renewable energy function.	

**Table 5.2: Summary of the operational mitigation and management measures – Cultural Heritage**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
Impact upon setting of heritage assets set outside of the site	<p>The <b>oLEMP [EN010141/DR/7.7]</b> sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, inclusive of the setting of heritage assets outside of the site. Those measures will be followed thus ensuring that is protected during the operational phase of the Scheme, and that new planting is provided and maintained where required throughout the operational phase.</p> <p>Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.</p>	<p>Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p> <p>Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.</p>
Impact upon Scheduled Monuments	Aside from landscape maintenance works, or works in accordance with a written scheme of investigation agreed with Historic England, there will be no works within the Roman small town south of Great Staughton scheduled monument.	
Impact upon setting of heritage assets set outside of the site	Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.	

**Table 5.3: Summary of the operational mitigation and management measures – Ecology**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Potential habitat loss or disturbance to wildlife through management and maintenance activities on site.</p> <p>Indirect and direct impacts to on-site habitats.</p>	<p>Any works with the potential to disturb wildlife, such as vegetation clearance, will be scheduled outside of sensitive periods (e.g., bird nesting season). If this is not possible, pre-work surveys will be conducted by the EcoCoW or other suitably qualified ecologist.</p> <p>The <b>oLEMP [EN010141/DR/7.7]</b> sets out measures for the delivery of the landscape strategy, which would also ensure that the ecological mitigation and enhancement (biodiversity net gain) measures that have been integrated into the Scheme are successfully delivered. The final LEMP that will be produced following the grant of a DCO will include measures to ensure that impacts from management activities are minimised and harm to fauna is avoided. Those measures will be followed during the operational phase of the Scheme.</p> <p>Lighting to be used only where required, and if used to be task specific and directed away from boundary habitats including woodland, hedgerows and watercourses.</p> <p>Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oOEMP.</p> <p>Task-specific lighting will be used to avoid light spill into sensitive habitats (e.g., woodland, hedgerows, and watercourses).</p> <p>Best practice measures will be implemented to control dust, run-off, noise, light, vibration, and vehicle movements throughout the operational phase (including for any periodic replacements), as set out in the air quality, noise, and traffic tables of this oOEMP.</p>	<p>An EcoCoW will be appointed for the operational phase who will review and monitor all works on Site.</p> <p>Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p> <p>Records to be kept of habitat maintenance and remedial actions taken, in accordance with the requirements of the LEMP.</p> <p>Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.</p>
<p>Disturbance to protected and notable species through</p>	<p>Prior to any significant replacements, ecological surveys will be carried out for protected species, such as otters, water vole, badgers, roosting bats, great</p>	

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
management and maintenance activities or periodic replacements	<p>crested newts, and breeding birds. Should any of these protected species be identified, appropriate mitigation measures will be implemented in accordance with relevant legislation and best practice guidelines to ensure their protection throughout operational activities and included in the notification referred to in Section 2.0 of this oOEMP.</p> <p>The final OEMP will provide details of the mammal gaps to be incorporated into perimeter fencing to maintain habitat connectivity, as per the oLEMP.</p>	Species monitoring as detailed in the LEMP, including reporting on population trends of key species.
Spread of Invasive Non-Native Species (INNS) through management and maintenance activities or periodic replacements	<p>An Invasive Non-Native Species (INNS) Management Plan will be developed to control and, where possible, eradicate INNS.</p> <p>Training will be provided to site staff to ensure compliance with biosecurity measures, including cleaning equipment before and after use in affected areas.</p> <p>Any soils containing INNS will be managed in line with regulatory requirements and disposed of appropriately.</p>	Effectiveness of control measures will be reviewed, and adjustments made if necessary.

**Table 5.4: Summary of the operational mitigation and management measures – Hydrology and Flood Risk**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Impact upon water quality from run-off from permanent hardstandings and structures.</p> <p>Impact of surface water flows upon watercourses from new hardstandings. and flows form the same</p>	<p>An <b>oSWMP [EN010141/DR/7.13]</b> has been submitted with the application and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. If the DCO is granted, the oSWMP will be developed into a final Surface Water Management Plan (SWMP) once a contractor is appointed. This will include measures for the proposed management measures for surface water quality, and management of surface water (including the rate and volume of surface water run off) during operation. The surface water management measures must then be maintained and operated per the SWMP.</p>	<p>Drainage features will be regularly monitored to ensure that they are operating effectively. Specific details of this monitoring will be confirmed in the detailed SWMP.</p> <p>Requirements for a detailed watercourse quality monitoring plan will be agreed with the regulator. This would include details of all baseline, construction phase and post construction (operational phase) monitoring, which will involve both visual assessments and quality testing.</p>
<p>Chemical and fuel spillages resulting in pollution of watercourses and/or ground water</p>	<p>Equipment and spill kits will be provided to contain and clean up any spills to minimise the risk of pollutants entering watercourses.</p> <p>Where fuel, oil or solvents are stored temporarily on Site, these containers will all be stored within bunded areas and covered.</p> <p>Additional precautions would be taken during plant operation in any areas where there is storage of fuels or chemicals.</p> <p>An Environmental Incident Management and Pollution Prevention Plan will be produced prior to the date of final commissioning for any phase of the authorised development commencing and will be reviewed and updated regularly by the Site Manager. Training will be provided to site workers as part of induction processes and will be updated as necessary. This plan will contain information relating to the location of spill kits and any sensitive receptors, as well as the procedure for incident response. In the unlikely event of any incident, the Site Manager will be notified and will work to coordinate remedial actions.</p>	<p>ERP to include measures in respect of containing and then treating fire water in the event of a fire at the BESS. Should an event occur then effectiveness of measures will be monitored and reported upon.</p>
<p>Uncontrolled release of fire water in the event of a fire</p>	<p>Measures to contain and control any potentially contaminated firewater run-off in the event of a fire at the BESS are set out in the <b>outline Battery Safety Management Plan (oBSMP) [EN010153/DR/7.8]</b> which will be developed into a</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>final BSMP prior to construction, as secured by a Requirement of the <b>draft DCO [EN010153/DR/3.1]</b>.</p> <p>The Emergency Response Plan (ERP) will include steps to ensure that fire water is contained within the site in the event of a fire, and then for its subsequent treatment.</p>	
Foul Drainage	<p>There will be no unapproved discharge of foul drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway. The sewage system for the storage, operations and maintenance building will be maintained and managed as required.</p> <p>Where temporary welfare facilities are in place sewage and foul water will be collected in appropriate collection tanks. Regular collection and disposal of sewage and foul water will be conducted by a licenced company.</p>	
Risk of flooding to Site Operatives	<p>A Flood Warden will be appointed, who will be familiar with the Site and the risk of flooding in the area, and will ensure that operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.</p>	<p>Monitoring of flood events by the Flood Warden and recording of responses to these and the effectiveness of measures taken.</p>

**Table 5.5: Summary of the operational mitigation and management measures – Traffic and Transport**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Movement of vehicles for operational maintenance activities and periodic replacements.</p>	<p>The operational phase of the Scheme would generate a low level of trips (staff vehicles, a small number of delivery and service vehicle trips, and occasional access by HGVs during replacement of items such as transformers, etc.) for general maintenance activities and for any periodic replacements. Therefore, there is not expected to be any significant effect on the highway and so no specific mitigation measures are proposed.</p> <p>The Site accesses, access tracks, and parking area at the storage, operations and maintenance building will be maintained throughout the operational phase of the Scheme.</p>	<p>The Site Manager will undertake such monitoring as is necessary. Further details to be confirmed in the OEMP.</p>
<p>Impact upon users of PRow within the Site.</p>	<p>An <b>outline Public Right of Way Management Plan [EN010141/DR/7.8]</b> has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction in accordance with a Requirement of the <b>draft DCO [EN010141/DR/3.1]</b>. This will set out measures to maintain the safety of PRow users during the operational phase of the Scheme.</p>	<p>The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the OEMP and in a Public Right of Way Management Plan.</p>

**Table 5.6: Summary of the operational mitigation and management measures – Noise and Vibration**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Impact of noise arising from operation at noise sensitive receptors (NSR).</p>	<p>Equipment will be regularly inspected and checked for signs of disrepair or other problems that are creating an increase in volume or a change in tonality. Where complaints are received, these will be investigated, where required by a suitably qualified practitioner working to the latest version of BS 4142 (or any subsequent equivalent standard), to identify the source of any issue. Where an issue is found action will be taken to resolve it within a reasonable timeframe.</p> <p>Prior to the date of final commissioning for any phase of the authorised development, an Operational Noise Assessment will be submitted to the relevant LPA, demonstrating how the Scheme design incorporates mitigation to ensure compliance with the operational noise rating levels set out in Paragraph 10.7.6 of <b>ES Volume 1, Chapter 10: Noise and Vibration [EN010141/DR/6.1]</b>.</p> <p>The design as described in the operational noise assessment must be implemented as approved and maintained throughout the operation of the Scheme.</p>	<p>The OEMP will include details of the required performance levels of the operational plant with respect to noise, and the required recording of inspections of the same.</p> <p>The Environmental Manager will record any complaints in the relevant system, and record the result of any complaint.</p>
<p>Impact of noise arising from maintenance and repair activities at noise sensitive receptors (NSR).</p>	<p>Best practical measures will be employed in accordance with BS5228-1:2009+A1:2014 (or any subsequent equivalent standard) to control noise generation (e.g. using equipment that is regularly maintained, where practicable use equipment fitted with silencers or acoustic hoods).</p> <p>Operational maintenance will take place only during daytime hours, except in emergencies.</p> <p>Routing of plant and vehicles will be optimised to minimise noise at sensitive locations.</p> <p>Acoustic hoods and silencers will be fitted to noisy plant where required.</p> <p>Non-tonal 'broadband noise' reversing alarms will be used instead of tonal beepers.</p>	<p>Appropriate survey/s undertaken to show compliance with noise threshold guidance, and compliance with measures regularly recorded via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.</p>

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Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Local residents will be informed in advance of any planned noisy maintenance works.	

**Table 5.7: Summary of the operational mitigation and management measures – Air Quality**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Impact of dust arising from activities on the site, and movement of vehicles within and outside the site</p>	<p>Best practice measures will be set out in the OEMP to control and manage dust emissions. Measures to be derived from the Institute of Air Quality Management (IAQM) guidance.</p> <p>Measures would include:-</p> <ul style="list-style-type: none"> <li>• Use of suitable dust suppression measures or techniques when using cutting, grinding, or sawing equipment.</li> <li>• Suppression of dust/particulate matter using non-potable water where possible and appropriate.</li> <li>• Dry spillages to be cleaned as soon as possible after the event using suitable equipment and wet cleaning methods.</li> <li>• Fully enclosing the site of operations where there is a high potential for dust production and there is a high potential of impacting upon receptors for an extended period.</li> <li>• Ensure the proper maintenance of access roads, clean the highway or access roads where material is tracked onto them.</li> <li>• Provision and enforcement of internal site speed limit of 20mph along internal access tracks.</li> <li>• Ensuring that any material being carried in vehicles is properly secured and contained.</li> <li>• Inspection of vehicles before using public highway and removal of dust/soil where required.</li> <li>• Where earthworks are required, then their extent is to be minimised to reduce exposed areas, and completed earthworks and other exposed areas are to be covered with topsoil and re-vegetated as soon as practical to stabilise surfaces.</li> </ul>	<p>Compliance with measures to be regularly recorded via an appropriate method to be set out in the OEMP. Site inspections and road monitoring to be undertaken as required.</p>

**Table 5.8: Summary of the operational mitigation and management measures – Ground conditions**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Encountering unexpected contamination during operation</p>	<p>An Unexpected Contamination Protocol will be developed.</p> <p>The protocol will include site-specific guidance on identifying and managing previously unidentified contamination, detailing required actions, risk assessments, and necessary engagement with regulatory bodies.</p> <p>Any unexpected contamination will be logged, and remedial actions taken in accordance with best practice guidelines.</p>	<p>Compliance monitoring with the Unexpected Contamination Protocol.</p>
<p>Generation of contaminated run-off</p>	<p>Implementation of Environmental Incident Management and Pollution Prevention Plan to be developed to include, amongst other information, contact with appropriate regulatory authorities.</p> <p>Maintenance of existing drainage and SuDS features to ensure proper containment and filtration of run-off.</p> <p>Routine training for site operatives on pollution prevention and emergency response procedures.</p>	<p>Monitoring and sampling as detailed within Environmental Incident Management and Pollution Prevention Plan to be included as part as OEMP.</p>
<p>Leaks and spillages of fuel, chemicals, or hazardous materials</p>	<p>The storage of fuels or chemicals and cleaning agents required during the operational phase will be limited to cleaning agents, fuel for equipment, fuel for diesel generators, and above ground diesel and ad-blue tanks / fuel tankers for re-fuelling Site plant. Fuel storage would be housed appropriately and bunded, refuelling would be limited to designated re-fuelling areas away from sensitive receptors.</p> <p>Cleaning agents and other hazardous materials will be stored in a suitable bunded location on site, and will be returned to this location in properly sealed containers at the end of each working day.</p> <p>A suitably stocked spill-kit will be retained within the Site, and an Environmental Incident Management and Pollution Prevention Plan will be prepared setting out</p>	<p>Routine inspections of fuel and chemical storage areas.</p> <p>Incident reporting and follow-up actions for any spills.</p>

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
	<p>procedures to respond to a spillage, and for reporting if required to the Environment Agency.</p> <p>Equipment to be regularly inspected to ensure that damage or leaks are identified early and repairs are made or equipment is replaced.</p>	
Soil erosion or ground instability	Soil management measures in line with the principles of the approved Soil Management Plan for construction will be set out in the OEMP. The surface water drainage strategy will ensure drainage measures prevent erosion and protect soil structure.	<p>Periodic inspections of ground stability and erosion-prone areas.</p> <p>Geotechnical assessment if works are required near bund structures.</p>
Contamination of groundwater	<p>The Site Manager shall, wherever reasonably practicable, ensure that fuels, oils and other chemicals used during operation, including cleaning agents, decontaminants and similar products, are free from intentionally added PFAS.</p> <p>Where PFAS-free alternatives are not reasonably practicable, products shall be selected, stored, handled and used so as to minimise the risk of contamination to soil, groundwater and surface water.</p>	Regular audits to assess compliance.

Table 5.9: Summary of the operational mitigation and management measures – Land and Soils

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts to soils	<p>Implementation of the measures set out in the <b>outline Soil Management Plan [EN010141/DR/7.9]</b> which will be developed into a final Soil Management Plan in accordance with a Requirement of the <b>draft DCO [EN010141/DR/3.1]</b>.</p> <p>Should there be a need for soil disturbance during maintenance activities, this would be managed in accordance with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and the Ministry of Agriculture Fisheries and Food (MAFF's) Good Practice Guide for Handling Soils and include the following:</p> <ul style="list-style-type: none"> <li>• Careful control of movement of plant and vehicles around the Site, including use of low-pressure tyres to distribute weight where possible.</li> <li>• Management of soil horizons to ensure that topsoils and subsoils are kept separate when excavated, not mixed with other materials, and replaced in a sensitive manner to restore pre-excavation soil horizons and avoid excessive compaction.</li> <li>• Avoiding multiple handing of soils, which should be moved directly from areas being excavated or stripped to receptor sites, stockpiles, or reinstatement.</li> <li>• Ensuring soils are only handled in appropriate moisture conditions.</li> </ul> <p>Recording of soil handing operations and regular monitoring of soil condition across the Site in accordance with the SMP.</p>	Soil handling operations will be recorded and regular monitoring of soil conditions, including compliance with the CEMP, across the Site.
Impacts to soils through compaction, and loss or degradation	Movement of maintenance vehicles around the Site to generally be on access tracks, with movement off these only when soils are dryer and less susceptible to compaction and waterlogging and vehicles to use low-pressure tyres to distribute weight where possible.	Soil assessments and monitoring will take place as detailed in the SMP (to be appended to the OEMP prior to the date of final commissioning for any phase of the authorised development commencing). The

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
	<p>Landscape maintenance vehicles will have lower pressure types, and will generally only access relevant areas only when soils are dryer and less susceptible to compaction and waterlogging.</p> <p>The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, and includes detail of measures to manage vegetation during the operation of the Scheme. This will also ensure proper management of the soils on site, and reduce the potential for the degradation or compaction. Those measures will be followed thus ensuring that vegetation is properly managed and maintained in the operational phase of the Scheme.</p>	<p>Environmental Manager will be responsible for ensuring compliance with measures regularly recorded via an appropriate method to be determined in the SMP.</p> <p>For the LEMP, appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p>

**Table 5.10: Summary of the operational mitigation and management measures – Socio economics**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Disruption to local residents, businesses, and community facility use</p>	<p>Measures to mitigate the effects of visual impacts during operation are outlined in Table 5.1: Landscape and visual.</p> <p>Measures to mitigate the effects of traffic during operation are outlined in Table 5.6 Traffic and Transport.</p> <p>Measures to mitigate the effects of noise during operation are outlined in Table 5.8 Noise and Vibration.</p> <p>Measures to mitigate the effects on air quality during operation are outlined in Table 5.10 Air Quality.</p>	

**Table 5.11: Summary of the operational mitigation and management measures – Climate change**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts on on-site workers from extreme weather events and conditions	Weather conditions will be actively monitored, with forecasts reviewed daily to inform site operations.	Logging of weather forecasts and distribution to site staff and contractors.
	Risk Assessment Method Statements (RAMS) will be developed for site activities, ensuring appropriate safety measures are in place for adverse weather conditions.	Periodic audits of RAMS and staff training compliance.
	Staff will be provided with climate-appropriate PPE and trained in extreme weather response protocols.	
Damage to equipment from extreme weather events / climate conditions	Equipment, plant, and materials will be selected to meet industry standards for resilience against extreme weather conditions and to withstand the range of climatic conditions predicted to occur in the future.	Routine inspection and maintenance of equipment and drainage infrastructure.
	Regular maintenance checks will be undertaken to ensure there are no defects that could be vulnerable to extreme weather events.	Incident reporting for any weather-related damage.
	Drainage systems will be regularly maintained to prevent flooding.	
Increased risk of flooding	This matter is dealt with in Table 5.4 in respect of measures for hydrology and flood risk	Follow monitoring measures set out in Table 5.4.
Release of greenhouse gas emissions from operational	Sustainable methods of working will be adopted for maintenance activities and periodic replacements as far as practicable, including:	Periodic review of operational energy consumption and emissions.

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>activities and periodic replacements</p>	<ul style="list-style-type: none"> <li>• Regular planned maintenance of the plant and machinery to optimise efficiency.</li> <li>• Implementing measures to decrease fuel use by maximising efficiencies, and avoiding engine idling.</li> </ul> <p>All members of the supply chain providing a carbon reduction plan where feasible.</p> <p>Staff travel and site operations will be optimised to minimise emissions.</p> <p>The embodied carbon of materials and components will be factored into the procurement process for any repairs and replacements, and where reasonably practicable lower-carbon or locally sourced materials will be selected, in order to minimise the Scheme's lifecycle greenhouse gas emissions.</p>	
<p>Fugitive emissions of sulphur hexafluoride (SF6) from gas-insulated electrical equipment</p>	<p>SF6-free electrical components will be prioritised wherever feasible to eliminate emissions from gas-insulated switchgear and transformers.</p> <p>For any equipment that uses SF6, only sealed-for-life components with extremely low leakage rates will be used to minimise fugitive emissions.</p> <p>Routine inspections of electrical equipment will be conducted to detect and prevent leaks.</p> <p>End-of-life disposal of SF6-containing equipment will follow best practice handling procedures to prevent atmospheric release.</p>	<p>Regular equipment inspections to ensure SF6 containment integrity.</p> <p>Monitoring and reporting of SF6 usage, leakage rates, and disposal practices.</p>

**Table 5.12: Summary of the operational mitigation and management measures – Waste**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Generation of waste during maintenance activities and periodic replacements</p>	<p>A Waste Management Plan (WMP) will be implemented to ensure compliance with the Waste Hierarchy (prevention, re-use, recycling, recovery, and disposal as a last resort).</p> <p>Waste from operational activity (site offices &amp; welfare facilities, maintenance of construction vehicles, packaging from incoming materials, etc.) to be separated/segregated into main waste streams and stored appropriately prior to collection by an approved waste contractor.</p> <p>Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier.</p> <p>The volume of waste streams generated by the Scheme to be estimated and monitored, and goals set with regards to the waste produced, re-use and recycling, and off-site disposal.</p>	<p>Register of waste loads maintained to track volumes and types of waste generated.</p> <p>Regular audits to assess compliance with waste reduction measures.</p>
<p>End-of-life waste from solar panels and battery storage systems</p>	<p>Any Solar panels that need to be replaced will be dismantled and sent to specialist PV recycling facilities, where materials such as silicon cells, polymers, and metals will be recovered.</p> <p>Battery Energy Storage Systems (BESS) will be refurbished, repurposed, or recycled where feasible, reducing disposal requirements.</p> <p>Any Transformers and inverters that need to be replaced will be either reused or sent for metal recovery at authorised recycling facilities.</p>	<p>Documentation of panel and battery disposal or repurposing.</p> <p>Periodic review of emerging recycling technologies to maximise material recovery.</p>

## 6.0 IMPLEMENTATION OF MANAGEMENT PLAN

6.1.1 The OEMP will define all responsibilities roles and actions required for implementation of the measures that are set out in this oOEMP. These will include as a minimum:

- The team roles and responsibilities, along with the named individuals fulfilling those roles. An organogram and contact directory will also be included;
- The procedures required for monitoring, inspection, and reporting of site operations;
- Document control systems and procedures;
- Details of the communication strategy (stakeholders and third parties);
- Details of the required training for key personnel on environmental topics relevant to the Scheme and OEMP. This will include information on toolbox talks and on-site briefings necessary to ensure that relevant staff and site operatives are aware of environmental control requirements and procedures, and have the necessary knowledge to implement them;
- Measures to ensure staff and personnel are informed of changes to circumstances as work on the Scheme progresses; and
- Procedures for environmental emergencies.

## 7.0 MONITORING AND MAINTENANCE

### 7.1 Monitoring

- 7.1.1 To ensure and demonstrate compliance with the measures set out in the OEMP, monitoring and reporting will take place throughout the operational phase of the Scheme. This process will also include oversight of the resulting reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits to be undertaken will be provided in the OEMP.
- 7.1.2 The Environmental Manager will regularly observe site activities and in particular will attend when new activities first occur, to ensure compliance with the OEMP, raise deviations where they occur, and to monitor actions and conditions on the site. They will also undertake regular walkover surveys of the site to monitor compliance with the OEMP. They will also undertake regular inspections as required by the OEMP and overall audits of the OEMP to ensure compliance with its requirements. They will also meet regularly with the Site Manager to discuss the operation of the Scheme and any issues arising from that or their inspection/monitoring activities. They will also undertake day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.
- 7.1.3 All activities observed by the Environmental Manager, the results of surveys and inspections undertaken by them, and reports produced by them will be documented and logged.
- 7.1.4 Where complaints are received from members of the public these will be logged by the Site Manager in a record keeping system. These logs will include details of the complaint, and actions arising from the same.
- 7.1.5 Similarly, where matters or complaints are raised by the CLG, these will be logged by the Community Liaison Officer in a record keeping system. These logs will include details of the matter/complaint, and actions arising from the same.

7.1.6 All complaints will be reviewed by the Site Manager, Community Liaison Officer, and Environmental Manager, and the result of the review and any corrective actions taken will be logged. The Complaints Log will be reviewed for signs of wider on-going issues, and where these are identified corrective action will be taken.

## 7.2 Record keeping

7.2.1 A Quality and Safety Management Systems (QMS) and Environmental Management System (EMS) will be provided. These will be certified in line with the ISO 14001 standards (or any equivalent standard in place during the operational phase).

7.2.2 Those systems will ensure that records are kept of monitoring, recording, and implementing of environmental management measures for the Scheme. This is vital to ensuring that the Scheme is delivered with a high standard of environmental control throughout the operational phase of the Scheme, and that corrective actions are undertaken.

7.2.3 A central record keeping system will be established (by the Quality Manager, or a suitable person with delegated responsibility for the same) which will provide a repository for procedures, checklists, reports and other such measures required for the EMS and QMS. This will include maintaining records of inspections, audits, or other such activity undertaken by internal or external parties undertaking audit of the OEMP and measures therein. These would include the following records as a minimum:-

- Licences, approvals, and other similar regulatory documents.
- Environmental surveys.
- Records of environmental equipment tests.
- The Environmental Action Schedule.
- Records of routine site inspections.
- Details of incidents, breaches of the OEMP, or complaints from third parties, and corrective action taken in respect of the same.

- 7.2.4 A full review of the OEMP will be conducted during regular intervals and as required to respond to specific issues that may arise. Where a review identifies an issue that requires additional control measures or mitigation to be incorporated into the OEMP, or modifications to existing measures or mitigation, the changes will only be implemented following prior agreement from the Local Authorities.
- 7.2.5 Records relating to the OEMP will be made available for monitoring compliance with the OEMP upon request by a Local Planning Authority, the Environment Agency, Natural England, or Historic England (or any equivalent successor bodies).