EAST PARK ENERGY

East Park Energy

EN010141

Outline Decommissioning Environmental Management Plan

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1.0 INTRODUCTION

1.1 Background

1.1.1 This outline Decommissioning Environmental Management Plan (oDEMP) has been prepared for the decommissioning 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 oDEMP 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 decommissioning of the Scheme.

1.1.4 This oDEMP is concerned with the decommissioning phase of the Scheme, the following documents cover the separate construction and operational phases:

- Construction phase – **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**; and
- Operational phase – **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]**.

1.1.5 If the DCO is granted, this oDEMP will be developed into a final Decommissioning Environmental Management Plan (DEMP) prior to the commencement of any decommissioning works (noting that decommissioning

may be brought forward in phases and so there may be multiple DEMPs[1]). Any DEMP brought forward must be in substantial accordance with this oDEMP, 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) prior to the commencement of the decommissioning works.

1.1.6 Nothing in this oDEMP will prevent the modification or omission of the control measures set out in section 4 and 5 where the decommissioning 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 DEMP for approval.

1.2 Document Structure

1.2.1 This oDEMP is structured as follows:

- **Introduction** – provides an introduction to the document and defines the structure of the oDEMP;
- **Description of Development** – provides a summary of the Site and site context, a description of the Scheme, and sets out a summary of the expected decommissioning activities;
- **Roles & Responsibilities** – sets out the roles and responsibilities that will need to be defined at the decommissioning phase, and identifies stakeholders relevant to the environmental management of the decommissioning phase;
- **Decommissioning Environmental Management** – sets out principles and site rules to be applied in the decommissioning of the Scheme, and how communication with third parties will be undertaken during decommissioning;

[1] As such, references to 'the DEMP' within this oDEMP should be considered as meaning any DEMP that is brought forward.

- **Environmental Mitigation Measures** – sets out the environmental management and mitigation measures that are required to address the effects of the Scheme during the decommissioning 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 DEMP to ensure successful implementation of the final DEMP; and
- **Monitoring and Maintenance** – sets out the procedures for monitoring and ensuring compliance with the final DEMP, as well as requirements for record keeping.

1.3 Relationship with Other Management Plans

1.3.1 This oDEMP is part of a framework of environmental management documents that will be implemented during the decommissioning phase of the Scheme. The final DEMP will work alongside several other specific management plans for the decommissioning phase, which provide further details on mitigation and management measures. These include, but are not limited to:

- **Decommissioning Surface Water Management Plan (DSWMP)**: This plan will detail site-wide measures for drainage, rainfall runoff management, reducing runoff of silty or otherwise contaminated run-off and groundwater interaction during decommissioning. The plan will be agreed with the relevant LPA prior to decommissioning works commencing and will involve monitoring of groundwater and surface water quality prior to, during and for an agreed period of time after decommissioning has taken place.
- **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, and protecting soil health throughout the decommissioning phase 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 for the decommissioning of the Scheme.
- **Invasive Non-Native Species Management Plan (INNSMP)**: This plan will outline monitoring and control measures for invasive non-native species during the decommissioning works, ensuring that invasive species 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 decommissioning, this protocol will detail the procedures for risk assessment, reporting, remediation, and verification.
- **Decommissioning Traffic Management Plan (DTMP)**: will be prepared to optimise vehicle movements and minimise unnecessary trips.
- **Decommissioning Noise Management Plan**: This plan will set out measures to control and manage noise impacts during the decommissioning phase of the Scheme.
- **Decommissioning Dust Management Plan**: This plan will set out measures to control and reduce dust during the decommissioning phase of the Scheme.
- **Decommissioning Waste Management Plan (WMP)**: This plan will set out procedures for the management of decommissioning waste, ensuring compliance with the Waste Hierarchy and regulatory requirements.
- **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.

1.3.2 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly by the Decommissioning

Project Manager, Environmental Manager and relevant regulatory authorities. Monitoring results will be documented as part of the compliance framework for the decommissioning phase.

1.3.3 If the DCO is granted, each of the above plans will be developed into a final document prior to the decommissioning phase commencing, with approval by the relevant LPA prior to decommissioning, where appropriate, following consultation with relevant bodies.

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

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.

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.

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,

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 Decommissioning programme

2.4.1 The Scheme comprises a temporary development and 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.

2.4.2 When the operational phase ends the Scheme will require decommissioning. All solar PV modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, cable jointing chambers installed for the grid connection, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, will only be left in place where the damage caused by recovering them is considered greater than the environmental benefits of recovering and recycling them. The Site will be returned to a condition suitable

for return to its original use after decommissioning. Confirmation of the approach to be taken including a benefits/impacts analysis of the impacts of the preferred approach will be set out in the final DEMP, and will take account of any contemporary legislation, regulatory guidance or best practice at the time of decommissioning.

2.4.3 On decommissioning, the landscaping works undertaken across the Site would remain in place, and the land would be handed back to the landowner. It is very likely that tree and hedgerow planting would be retained, however, as the land would be handed back to the landowners on completion of decommissioning the longer-term retention of the landscaping improvement works cannot be guaranteed. Similarly, following decommissioning the landowner may or may not retain the permissive footpaths created across the Site.

2.4.4 Any requirements to retain access tracks will be discussed and agreed with the landowners as part of the decommissioning process.

2.4.5 The land forming the Site is to be leased for the Operational Phase, and therefore following decommissioning the land would be returned to landowners in accordance with their relevant commercial agreements. The following elements would be retained as part of decommissioning phase and handed back to landowners:

- Proposed Native Species Woodland and Woodland Belt Planting;
- Proposed Native Species Hedgerow Planting; and
- Proposed Native Species Individual Tree Planting.

2.4.6 These would be mature features by the time of decommissioning, and so their annual maintenance requirements would be relatively limited and comparable to the ongoing long term management prescriptions of the **outline Landscape and Ecological Management Plan [EB010141/DR/7.7]**.

2.4.7 The ecological enhancement elements would be retained on Site at decommissioning and will be at the discretion of landowners for their future use.

2.4.8 The following elements would be at the discretion of the landowners once the land is handed back, and could either be retained or reverted to existing (arable) use:

- Proposed Grazing Pasture or Neutral Grassland; and
- Species-Diverse Grassland.

2.4.9 The landowners will be able to determine the outcome of these areas based on the agricultural or economic factors at the time of decommissioning.

2.4.10 It is likely that the generation bay and associated infrastructure therein at Eaton Socon substation will be left in situ following decommissioning because National Grid will own this infrastructure.

2.4.11 The effects of decommissioning are often similar to, or to a lesser magnitude than, the construction effects. They have been considered within the relevant sections of the ES. However, there can be a high degree of uncertainty regarding decommissioning as engineering approaches and technologies evolve over the operational life of the Scheme. More detail on the methods and activities for decommissioning will be provided in the final DEMP in line with the relevant standards at the time, and as per consultation with the Local Planning Authorities, prior to commencement of decommissioning.

2.5 Decommissioning Access, Traffic, Compounds and Resourcing

2.5.1 It is anticipated that access during the decommissioning phase will follow the same principles as in the construction phase, and therefore the mitigation measures set out in the **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]** would also apply to the decommissioning phase.

2.5.2 A specific Decommissioning Traffic Management Plan (DTMP) will be prepared prior to commencement of the decommissioning phase, in consultation with the relevant LPA.

2.5.3 To summarise, the main access for all HGVs and most staff will be from the B645 into East Park Site D. The decommissioning traffic route will mirror the construction phase strategy, using an internal temporary access road to connect sites and minimise use of public highways, specifically avoiding Moor Road and Great Staughton village.

2.5.4 Existing access tracks and agricultural points will be used where possible, with upgrades made for safety if necessary.

2.5.5 With regards to vehicles and plant, the vehicles required will be similar to those used in construction, including standard vehicles (articulated lorries, low loaders, tippers, mobile cranes (40t), tankers, excavators, telehandlers, rollers, and cable pullers).

2.5.6 Transformer removal will potentially involve Abnormal Indivisible Load (AIL) vehicles (up to 200t) and one 250-tonne mobile crane.

Decommissioning Compounds

2.5.7 The main construction compound and satellite compound areas (shown on **ES Vol 2 Figure 2-5 [EN010141/DR/6.3]**) would be used again for decommissioning compounds. The main decommissioning compound would comprise offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and a loading and unloading area.

2.5.8 Satellite compounds would also be located across Sites A, B and C in relation to the decommissioning phasing of the solar areas. These compounds would be smaller in footprint than the main decommissioning compound but would still provide offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and loading/unloading area.

3.0 ROLES & RESPONSIBILITIES

3.1 Site Team

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

- **Principal Contractor** – This is a formal role established in the Construction (Design and Management) Regulations 2015 (CDM Regulations 2015). The Principal Contractor will be appointed by BSSL Cambsbed 1 Ltd and will have responsibility for co-ordinating the decommissioning phase of the Scheme.
- **Decommissioning Project Manager** – The Principal Contractor will identify a Decommissioning Project Manager who will have overall responsibility for implementation of the final DEMP 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 final DEMP 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 decommissioning 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.
- **Archaeological Clerk of Works –** The Archaeological Clerk of Works (ACoW) will be a suitably qualified archaeologist responsible for on-site management and monitoring of the works in relation to archaeology.
- **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 Decommissioning of the Scheme.

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

3.2 Stakeholders

Community Liaison Group

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

3.2.2 During the decommissioning phase, the purpose of the CLG will be to allow interested community members and bodies to be regularly updated on

decommissioning progress and activities. Regular meetings will be held with the CLG where the Community Liaison Officer will provide updates on the work, any changes that may occur (e.g. to due unforeseen circumstances), and other useful information (e.g. movement of large loads, upcoming road works 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 decommissioning 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 prior to and during decommissioning of the Scheme:

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

4.0 DECOMMISSIONING ENVIRONMENTAL MANAGEMENT

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

Decommissioning Hours of Work

4.1.2 Decommissioning operations would be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no works on Sundays, public holidays or bank holidays.

4.1.3 These decommissioning hours of work will be observed unless there are exceptional circumstances where the need arises to work outside of them. Where works are to be conducted outside the above hours they will comply with the restrictions stated in the final DEMP and any other restrictions agreed with the relevant LPAs.

Site Security

4.1.4 The Site will be secured during decommissioning by the security fencing surrounding the site which it is intended will remain in-situ during the decommissioning works, and thus would be the last feature removed. All plant and materials will be secured to prevent theft or vandalism. Remote monitoring and intrusion detection is likely to be managed via the use of deterrent systems such as ‘Armadillo’ camera security units.

Protection of the Public

4.1.5 In addition to the responsibilities set out under CDM Regulations 2015 (or the current equivalent legislation in place at the time of the decommissioning of the Scheme), the Principal Contractor 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.

4.1.6 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. Compounds and material storage areas will be fully secured within the site, and all materials, equipment, and plant will be fully secured when not in use, and in particular at the end of each working day.

4.1.7 Where Public Rights of Way (PRoW) cross the Site or interact with decommissioning access routes they will be suitably managed to protect the public. Management of PRoW is likely to involve the use of mesh fencing or Heras fencing as appropriate in order to clearly demarcate and separate PRoW from decommissioning traffic and activities. Where necessary, banksmen would be utilised where decommissioning traffic is required to cross a PRoW.

4.1.8 An **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** has been prepared and submitted with the application for development consent. This document sets out the principles by which PRoW will be managed during the construction, operational and decommissioning phases. Should the DCO be granted then a final updated Public Right of Way Management Plan would be produced prior to the start of decommissioning.

Signage

4.1.9 Health and Safety Signage will be positioned on the Site perimeter and around the site guiding traffic and pedestrians, and giving warnings of potential dangers and hazards (e.g. Warning: Construction site, No authorised access, Caution: construction traffic, and public/pedestrian directional signage etc.). Within the Site and at access points, signage will be erected setting out required conduct within the Site boundaries (e.g. Site Safety conduct signage, PPE instruction signage, Danger: Overhead Wires etc.).

Inductions

4.1.10 All site visitors and operatives will be directed in the first instance to a main compound, here they will be required to sign in and undergo a suitable induction 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.

4.1.11 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 their commencing work. Copies of the risk assessments and method statements will be held on site and will be available for use and inspection.

4.1.12 Operatives and visitors will be required to sign in and out every day.

Deliveries & Collection

4.1.13 Signage will be sited on the local highway network and at the site entrance to direct all deliveries & collections from the A1 to the main decommissioning compound in Site D. Drivers will be required to report to the site office 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.

4.1.14 HGV deliveries and collections to the Site will be allocated an arrival slot which they will be required to comply with. Arrival slots will be allocated by the Decommissioning Project Manager. A banksman will be made available to assist HGV drivers in accessing the site.

Health & Safety

4.1.15 The requirement for comprehensive health and safety assessments are an essential part of the construction process, with demolition and decommissioning work treated in the same way as any construction work, with the CDM Regulations 2015 setting out requirements and responsibilities.

Thus, a CDM Coordinator would be required to be appointed by the Principal Contractor prior to any decommissioning work commencing, and with health and safety assessments to be produced as part of the Construction Phase Plan required under the CDM Regulations (2015) (or the current equivalent legislation in place at the time of the decommissioning of the Scheme).

4.1.16 Weekly meetings will be held between the Principal Contractor, Decommissioning Project 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.

4.1.17 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 decommissioning of the Scheme.

4.1.18 In line with other requirements in this section, appropriately licenced contractors will be appointed to undertake groundworks, a safe system of working established prior to commencement of works, and PPE/Respiratory protective equipment (RPE) suitable for the tasks must be worn by operatives.

Contamination

4.1.19 Should a pollution incident occur, the relevant external organisations would be contacted. The details of those organisations will be provided on the relevant notices, for example with a spill kit, or held by the Decommissioning Project Manager overseeing the work. This could include:

- Environment Agency;
- Police;
- Fire and Rescue Service;
- National Grid;
- Natural England; and

- The Local Planning Authorities of Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council.

4.1.20 All accidents, incidents and near misses (including spills, dust, noise pollution etc) will be reported to the Decommissioning Project 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.

Unexploded Ordnance

4.1.21 As set out in **ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]**, a preliminary (pre phase 1) unexploded ordnance (UXO) desk study was completed which recommended that a detailed UXO desk study would be required. This is due to a number of Royal Air Force (RAF) facilities being located within 5 km of the Order Limits. A UXO Management Plan will be prepared prior to construction commencing and adhered to. A site-specific UXO awareness briefing will be given to all operatives. In certain areas as defined by the UXO Management Plan, an intrusive magnetometer survey of all pile locations and excavations down to the maximum bomb penetration depth will be undertaken.

4.1.22 As the decommissioning will not involve excavations (other than removal of existing infrastructure and other elements of the Scheme) it is not expected that UXO will be encountered in this phase.

4.1.23 A UXO specialist will be available during the decommissioning phase to respond to reports of suspicious objects.

Welfare Provision

4.1.24 Full welfare facilities will be provided by the Principal Contractor (as required by the CDM Regulations 2015, or the current equivalent legislation in place at

the time of the decommissioning of the Scheme), and these must be in place prior to decommissioning work commencing. The welfare facilities must be placed in convenient locations within the compound on each site, and as a minimum these will comprise the following: offices, welfare facilities, a toilet block, car parking, and stores. The main compound will include additional/larger facilities reflecting its role. The toilet and welfare facilities will store foul/wastewater which will then be collected/emptied by specialist licenced contractors.

Lighting

4.1.25 Temporary mobile lighting towers will likely be required during winter months. Lighting will be operated and positioned 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.

Utilities

4.1.26 Statutory undertakers will be engaged in regard to the existing and proposed utilities infrastructure (e.g. gas pipelines, water mains, electricity cables etc.) set within or around the Site and to agree safe working methods around that infrastructure. The **draft DCO [EN010141/APP/3.1]** includes protective provisions for the protection of existing utilities. Pre-decommissioning surveys are to be undertaken to accurately map the presence of utilities infrastructure on the Site.

Emergencies, Fire Plan, and Special Site Instructions

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

4.1.28 The final DEMP will detail the procedures for responding to incidents and emergencies on site, and any reporting.

4.1.29 A notice displaying emergency contact details will be displayed in a prominent location onsite – such as within the site office. External notices providing emergency contact details will be placed at prominent locations around the perimeter of the site.

4.1.30 At Site Induction all site personnel must be advised of the firefighting equipment on site and the escape routes & procedures. A Fire Plan will be kept in the site file. Permits for hot working will be issued as required.

Certification of Mobile Plant

4.1.31 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

4.1.32 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 decommissioning phase of the Scheme.

- Detail of measures to minimise, re-use, and control waste are set out later in this document and will be detailed in the final Decommissioning Waste Management Plan. However, briefly, these will as a minimum include: Take all reasonable steps to minimise the volume of waste generated by the decommissioning phase of the Scheme (e.g. reduce waste and re-use material wherever possible);

- 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

4.1.33 Prior to the commencement of decommissioning works a Decommissioning Surface Water Management Plan (DSWMP) will be produced and will be agreed with the relevant local authority at the time. This will set out the proposed management measures for surface water quality, and detail of methods for decommissioning activity in accordance with best practice.

4.1.34 The DSWMP will operate alongside the final DEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

Flood Risk

4.1.35 The Scheme has been designed to account for flood risk across the full life of the development, including decommissioning, as set out in **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**.

4.1.36 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

4.1.37 Neighbouring residents will be actively informed about the progress of works on the Site throughout the duration of the decommissioning phase of the

Scheme via the CLG. Regular communications will be sent to them to provide updates on the work, any changes that may occur (e.g. due unforeseen circumstances), and other useful information (e.g. movement of large roads, establishment of road works etc.). These will also include details of a contact telephone number and the project website.

4.1.38 A contact telephone number will be maintained throughout the duration of works (including an outside of working hours [out of hours] number for use if required) to allow members of the public, local businesses, and other such parties to make enquiries or raise a complaint. The telephone number provided to local residents and businesses will be maintained at all times whilst the decommissioning works are taking place in order to respond to any enquiries and complaints.

4.1.39 A project website will be maintained throughout the duration of works to allow members of the public, local businesses, and other such parties to view updates on the project, make enquiries or raise a complaint. The project website will be maintained at all times whilst the decommissioning works are taking place in order to respond to any enquiries and complaints.

4.1.40 A main site display board will be placed in a prominent location at the Site, and regular smaller site boards will be placed at key points on the site boundary. The main site display board shall provide detail on the works being undertaken and notices/summary information as the current stage of works and upcoming work. All site boards shall include detail of works being undertaken, the contact telephone number (including the out of hours number), the project website and a postal address where enquiries/complaints may be sent.

4.1.41 Any complaints arising from the site during the decommissioning phase will be addressed by the Decommissioning Project 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).

4.1.42 The complaints register will be regularly reviewed by the Decommissioning Project Manager as part of monitoring of the final DEMP to ensure that it is being followed, that any issues are identified, and to monitor compliance with its management and mitigation measures. It will also be made available to the relevant LPA to inspect on request.

Best practice measures

4.1.43 The Considerate Constructors Scheme (CCS), or equivalent scheme at the time of decommissioning, will be adopted for the Scheme. 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

4.1.44 The Decommissioning Project Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions noted in the final DEMP 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 will as a minimum form part of the final DEMP or the relevant identified associated plans. These have been prepared using detail set out in the ES of required measures for each topic. These measures will be secured in the final DEMP, which would be prepared by the Site Operator prior to decommissioning, which is secured as a Requirement of the DCO.

Table 5.1: Summary of the decommissioning 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 during decommissioning	A pre-decommissioning vegetation survey will be conducted to determine areas requiring protection during decommissioning activities. Any vegetation lost during decommissioning works will be replaced, following guidance in the final LEMP and using native species to support biodiversity and landscape integration.	Compliance to be recorded in the DEMP.
Visibility of decommissioning activities	Site to be kept tidy and organised. Temporary site lighting during decommissioning required to enable safe working during hours of darkness will be designed as far as reasonably practical so as not to cause a nuisance outside of the Scheme. Standard best practice measures will be employed to minimise light spill, including glare.	
Disruption to users of Public Rights of Way	Refer to Table 5.10 Socio Economics.	

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon Scheduled Monuments	In accordance with a Requirement of the draft DCO, an Archaeological Mitigation Strategy (AMS) is to be prepared prior to decommissioning, which must be in substantial accordance with the **outline Archaeological Mitigation Strategy [EN010141/DR/7.15]** submitted with the application. The scheduled monument within Site C will be demarcated on-site, and all decommissioning activities are to be excluded from this area, except for a temporary access track that crosses it. There will be no surface excavation within the boundary of the scheduled monument. The installation of the temporary access track will be undertaken in accordance with the approved AMS, with oversight from the ACoW to ensure the track is installed correctly. The temporary access track across the scheduled monument must be removed in accordance with the final Archaeological Mitigation Strategy at the end of the decommissioning phase. The buried cabling (at a depth of no less than 10m) would be removed by winching out the cables from either end. The buried conduit would be left in situ, filled with a suitable non-contaminative inert material to prevent any possible risk of future long-term collapse, and sealed/capped at either end.	Compliance to be recorded in the DEMP.
Direct impacts to archaeology	It is not expected that the decommissioning phase would have any impact beyond the impacts from the construction phase of the Scheme. No previously undisturbed land would be disturbed during decommissioning. Areas of Archaeological Constraint will be identified prior to decommissioning (with these expect to be as per those identified in the CEMP), and in these areas archaeology will be preserved in-situ through careful removal of the components of the Scheme.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
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 oDEMP.	

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Indirect impacts to off-site habitats, including designated sites for nature conservation Indirect impacts to retained on-site habitats including hedgerows, watercourses and ponds)	A pre-decommissioning ecological survey will be conducted to assess changes in site conditions and update mitigation requirements. Retained habitats, including hedgerows, trees, and wetland areas, will be protected using exclusion zones and buffer strips. Working area to be clearly delineated to prevent accidental encroachment beyond the working area. Sensitive habitats and sites (i.e., designated sites for nature conservation and ancient woodland) to be clearly signed. Dust suppression measures (e.g., damping down) will be used to minimise air quality impacts on sensitive habitats. Spill prevention measures will be in place, including bunded fuel storage and spill response kits. Watercourse buffer zones (minimum 10m) will be maintained to prevent contamination of aquatic habitats. Regular maintenance of sediment control measures, including silt fences and drainage channels. Details of the above will be set out in the Decommissioning Dust Management Plan.	Post-decommissioning habitat surveys to assess regeneration. Regular ecological monitoring during decommissioning.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	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. Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012 (or any subsequent equivalent standard).	
Disturbance to protected and notable species during decommissioning works	A pre-decommissioning ecological survey will be conducted to identify any protected species in accordance with best practice at the time. Appropriate exclusion zones will be established in accordance with regulatory requirements. Specific species protection measures set out below to be adopted. An Ecological Clerk of Works (EcoCoW) will oversee site activities to ensure compliance with wildlife legislation. Trenches will be backfilled or covered overnight, or otherwise fitted with a means of escape to prevent entrapment, such as planks or ramps. Where used, ramps will be no greater than 45 degrees in angle.	Watching briefs by the EcoCoW during high-risk activities.
Displacement of breeding birds due to removal of habitats	Vegetation clearance within the nesting bird season (March to August inclusive) to be avoided where reasonably practicable. Any vegetation to be cleared during the nesting bird season must first be checked by the EcoCoW. If a nest is located an appropriate buffer zone (species specific) will be enforced.	Regular ornithological monitoring throughout decommissioning.
Disturbance of Wildlife and Countryside Act Schedule 1 bird species	A pre-decommissioning survey for schedule 1 birds, with a focus on disturbance-sensitive species such as barn owl, will be undertaken prior to work commencing in any new location within the Site.	Compliance to be recorded in the DEMP.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Damage or destruction of bat roosts	Trees present within the Site would be retained and protected during decommissioning (in accordance with British Standard (BS) 5837:2012 (or any subsequent equivalent standard). However, if as a result of detailed design trees require removal/felling the trees where works are required would be subject to pre-decommissioning survey to assess any bat roost potential and appropriate mitigation measures (e.g., soft fell), further survey and/ or licencing to be undertaken. If bats are confirmed roosting within the tree(s), no removal would take place until a European Protected Species Mitigation Licence has been issued by Natural England. Trees with potential, but unconfirmed bat presence, would be felled under RAMS and Precautionary Working Method Statement, in line with BCT Guidance and UK Bat Mitigation Guidelines (or any subsequent equivalent standard).	Watching briefs by the EcoCoW during high-risk activities.
Killing/ injury of amphibians and/ or reptiles	RAMs would be implemented to avoid/reduce potential impacts on amphibians and reptiles, to include: • Clearance of suitable terrestrial habitat (e.g., tussocky grassland) to be undertaken following a two-stage cut. • Hedgerow removal to be subject to a hand search by the EcoCoW prior to removal. • Any suitable refugia (e.g., rubble piles) to be dismantled by hand under the watching brief of the EcoCoW. • Stored Materials to kept on pallets raised off the ground to discourage use as a refuge.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Damage to water vole burrows	A pre-decommissioning survey for water vole will be undertaken at all locations where ditch/ watercourse crossings are proposed. Where necessary, works will only proceed under an appropriate licence issued by Natural England.	
Disturbance of otter	A pre-decommissioning survey for otter holts will be undertaken prior to work commencing. Where necessary, works will only proceed under an appropriate licence issued by Natural England.	
Damage to badger setts or disturbance of badger using a sett.	A pre-decommissioning survey for badger will be undertaken prior to work commencing to identify any newly excavated badger setts. A 20 m buffer (30m for large, tracked machinery) would be maintained from active badger setts set out with Heras fencing or similar, with no works to be undertaken within this area unless covered under a specific method statement and agreed by the ECoW. If any works to setts is deemed necessary, works will only proceed under an appropriate licence issued by Natural England.	
Injury/killing of fish	Where works are required within a watercourse for the removal of culverts or structures and it is deemed that a dry works technique is required, the section of water between the 'dams' will be inspected for fish and other aquatic life such as eels. Prior to dewatering, the coffer-dammed area will be inspected using electric fishing and/or fine mesh seine netting to ensure all fish, including juveniles, are safely relocated. Where appropriate a fish rescue plan will be executed. Pumps will be fitted with 2mm aperture screens to prevent entrainment of elvers and glass eel. A Fish Rescue Plan will include details dewatering methods to include the use of fish-safe meshes to be installed over any pumps, monitoring of water pH, and siltation. The fish rescue plan will form a part of the final DEMP.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Measures to control run-off and pollution set out elsewhere in the oDEMP to be followed.	
Spread of Invasive Non-Native Species (INNS)	Prior to the commencement of decommissioning, a botanical invasive species walkover survey will be undertaken during an appropriate time of year (May to October) in order to assess the spread of invasive species. Any areas of identified as containing INNS will be suitably demarcated to ensure site staff are aware of its presence and avoid work in such areas without approval from the ECoW and inform production of an INNS Management Plan. A botanical invasive species treatment programme will be implemented by a licensed and experienced invasive species contractor, which will follow a detailed method statement set out in an Invasive Non-Native Species Management Plan produced prior to commencement of works to ensure that the INNS are not spread during works, that any soil containing them is managed appropriately, and that a long-term eradication or control programme is undertaken. Should further areas of spread / other invasive species be encountered on-Site prior to or during decommissioning, the advice of the appointed EcoCoW will be sought, and appropriate measures taken in order to achieve legislative compliance. The EcoCoW will ensure that a toolbox talk is provided to contractors on avoidance / good practice measures required to avoid facilitating the spread of INNS.	Regular INNS site inspections during decommissioning. Monitoring of biosecurity compliance and treatment effectiveness.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Increased sedimentation in runoff from decommissioning earthworks areas and other exposed ground.	A Decommissioning Surface Water Management Plan (DSWMP) will be developed to manage runoff and minimise flood risk. Erosion control measures (e.g., silt fences, sediment traps) will be implemented around exposed soils and watercourses. Decommissioning activities will be scheduled to avoid prolonged exposure of bare soil, particularly during high rainfall periods. Revegetation of disturbed areas will be carried out as soon as practicable to stabilise soils.	Regular water quality monitoring to detect sedimentation and contamination impacts. Visual inspections of erosion control measures.
Foul Drainage	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. 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.	
Contamination of groundwater and surface water from spills,	The DSWMP will be manage risks from contamination during the decommissioning phase. Pollution prevention measures (e.g., bunded storage areas for fuels/chemicals, spill kits) will be implemented and maintained. Refuelling and maintenance of machinery will be carried out in designated areas away from watercourses. Machinery and plant to be checked regularly for oil leaks. Wastewater and hazardous materials will be handled in compliance with prevailing regulations and removed by licensed contractors.	Routine inspections of spill response equipment. Incident reporting system for spills and leaks, with corrective actions recorded. Appropriate monitoring and sampling to be undertaken in accordance with approved plan.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Increased runoff volume during storm events	Storage of materials and equipment will be planned to avoid flood-prone areas. Temporary storage volumes for surface water run-off from the hardstanding areas will be provided during decommissioning by settlement ponds. Appropriate discharge consents will be obtained prior to commencement of decommissioning activities.	Daily flood risk monitoring using weather forecasts and Environment Agency alerts.
Increased flood risk due to removal of infrastructure and disturbance to drainage systems	A Flood Warden will be appointed to monitor weather conditions, receive flood warnings, and co-ordinate site response actions. A Flood Warning and Evacuation Plan will be developed will be developed, outlining procedures for halting works, securing equipment, and evacuating workers during flood events. Existing drainage infrastructure (e.g., Sustainable Drainage Systems (SuDS), ditches, and swales) will be retained and maintained during decommissioning where feasible.	Environmental Manager to review system logs from vibration detection systems daily, with alerts triggered if pre-defined thresholds are exceeded. Regular inspections of drainage systems to ensure they remain operational. Post-decommissioning assessment to confirm drainage functionality.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Increased traffic flows, including HGVs, on the roads leading to the Site.	A Decommissioning Traffic Management Plan (DTMP) will be prepared and will include measures to optimise vehicle movements and minimise unnecessary trips. Low-emission vehicles will be encouraged prioritising the best available vehicles at the time	The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the DTMP.
Severance and intimidation associated with increased traffic and abnormal loads.	The final DEMP will include measures to maintain the safety of PRoW users while minimising disruption to PRoW as much as possible during decommissioning works.	The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the DEMP.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of noise arising from decommissioning activities at noise sensitive receptors (NSR).	Decommissioning activities will be carried out in line with a Decommissioning Noise Management Plan (DNMP), which will form part of, or be submitted alongside, the final DEMP. Noise will be managed through the application of best practicable measures, following the guidance set out in BS5228-1:2009+A1:2014 (or any subsequent relevant standard). This will include, where feasible, the use of well-maintained machinery and equipment fitted with silencers, acoustic hoods, or other appropriate noise-reduction features.	Appropriate surveys undertaken to show compliance with noise threshold guidance, and compliance with measures regularly recorded via an appropriate method to be determined in the DEMP. The DEMP will detail the frequency.
Impact of vibration arising from decommissioning activities at vibration sensitive receptors.	Careful choice of any equipment that would generate vibration to minimise noise and vibration.	

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Dust generation from decommissioning activities (e.g., earthworks, dismantling, vehicle movements)	A Decommissioning Dust Management Plan (DDMP) will be prepared as part of, or to accompany, the final DEMP, in line with prevailing guidance on dust mitigation. Exposed soils and stockpiles will be damped down using water suppression where necessary. Drop heights will be minimised when handling materials to reduce dust emissions. Skips and enclosed chutes will be covered when handling waste.	A Dust Management Plan (DMP) would be developed and agreed with appropriate stakeholders and set out in the DEMP. Compliance with measures to be regularly recorded via an appropriate method to be set out in the DEMP. A scheme of quantitative dust monitoring to be developed and agreed with appropriate stakeholders and set out in the DEMP.
	Other measures in relation to internal haulage movements will include: • provision of hardstanding finish or heavy-duty construction matting on temporary internal access roads; • regular compaction, grading and maintenance of on-site non-metalled internal haulage routes; • regular inspections of the Site access, other access points, crossing points and local access points; • provision and enforcement of internal site speed limit; • sheeting of all incoming / outgoing vehicles carrying loose loads; provision of wheel cleaning facilities at appropriate locations before exit on the public highway.	
Impacts of gaseous emissions from use of on-site plant and	All Non-Road Mobile Machinery (NRMM) and decommissioning vehicles will comply with prevailing emission standards at the time of decommissioning.	Vehicle emission compliance checks.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
non-road mobile machinery (NRMM)		

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Encountering unexpected contamination during decommissioning	An Unexpected Contamination Protocol will be in place to form part of, or accompany the DEMP, setting out procedures for assessment and remediation if contamination is identified. Any contamination identified will be investigated and risk-assessed, with remediation strategies developed as required. A watching brief will be maintained by an Environmental Clerk of Works (ECoW) for unexpected contamination.	Regular site inspections by the ECoW. Incident reporting and remediation records for unexpected contamination.
Disturbance of existing made ground and potential mobilisation of contaminants	Controlled excavation methods will be used to prevent unnecessary mobilisation of contaminants. Stockpiling of excavated materials will be in designated areas away from watercourses and sensitive receptors.	Monitoring of groundwater surface water quality and soils to detect any contamination during decommissioning.
Generation of silty and otherwise contaminated run-off	An Environmental Incident Management and Pollution Prevention Plan (EIMP) will be implemented, and will include surface water management controls, including silt fencing and sediment traps, will be used to prevent contaminated runoff. Regular maintenance of decommissioning machinery to minimise leaks or spills. Any major decommissioning works will be minimised during heavy precipitation and carried out during the dry months where possible. Dust suppression during dry and wind conditions, good housekeeping during decommissioning to reduce potential impacts of list, dust and debris generation pursuant to a Decommissioning Dust Management Plan.	Routine inspections of pollution prevention measures. Water quality monitoring programme to detect contaminants, to be undertaken in accordance with the EIMP.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Leaks and spillages of fuel and chemicals required for decommissioning phase	An Environmental Incident Management and Pollution Prevention Plan (EIMP) will be implemented. Pollution prevention measures (e.g., bunded storage areas for fuels/chemicals, spill kits) will be implemented and maintained. Refuelling and maintenance of machinery will be carried out in designated areas away from watercourses. Machinery and plant to be checked regularly for oil leaks. Wastewater and hazardous materials will be handled in compliance with prevailing regulations and removed by licensed contractors. The storage of fuels or chemicals required during the decommissioning phase will be limited to diesel generators to provide power to the compound area and above ground diesel and ad-blue tanks / fuel tankers for re-fuelling Site plant. Such fuel storage would be housed appropriately in covered areas to prevent the accumulation of rainfall. These areas will be covered with impermeable surfacing and bunded, with an appropriate valve outlet to allow any standing water to be released. An oil separator will be used on the outlet from these bunded areas. The bunded areas will have a minimum capacity of 110% of the capacity of the containers. Refuelling would be limited to designated re-fuelling areas and a suitably stocked spill-kit will be retained within the compound areas as part of a standard construction compound requirement. Fuel storage and refuelling areas will be located at least 10 m away from the top of bank of watercourses.	Routine inspections of spill response equipment. Incident reporting system for spills and leaks, with corrective actions recorded. Appropriate monitoring and sampling to be undertaken in accordance with EIMP.
Contamination of groundwater	The Site Manager shall, wherever reasonably practicable, ensure that fuels, oils and other chemicals used during decommissioning, including cleaning agents, decontaminants and similar products, are free from intentionally added PFAS. 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.	Regular audits to assess compliance.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Soil erosion, compaction, and loss of soil quality	Soil management measures in line with the principles of the approved Soil Management Plan for construction will be set out in the DEMP Best practice soil handling measures will be implemented, including phased stripping and temporary storage. Topsoil and subsoil layers will be stored separately, with handling minimised to prevent compaction. Site restoration will include reinstatement of soil profiles and reseeding with appropriate vegetation.	Soil condition assessments before and after decommissioning. Regular checks on soil storage areas to prevent degradation.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disruption to users of Public Rights of Way	The final DEMP will include measures to ensure continued safe access for walkers, cyclists, and horse riders while minimising disruption of the PRoW as much as possible, in accordance with the principles established within the Public Rights of Way Management Plan from the construction phase. Temporary PRoW diversions will be clearly signposted, minimising inconvenience to users. Use of banksmen where PRoW and decommissioning traffic intersect to manage safety.	The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the DEMP.
Disturbance to leisure and recreation businesses near the site	Advance stakeholder engagement with local businesses and recreational organisations to provide notice of decommissioning works and discuss any required adjustments. Noise and dust control measures will be implemented to limit impacts on nearby leisure activities.	Consultation records with local businesses and recreation groups. Monitoring of noise and dust emissions near key receptors.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts upon on-site workers from extreme weather events and conditions	Weather conditions will be actively monitored, with forecasts reviewed daily to inform site operations. This includes proactive planning to account for the possibility of extreme weather events including the use of extreme weather alert systems.	Logging of weather forecasts and distribution to site staff and contractors. Periodic audits of RAMS and staff training compliance.
	Risk Assessment Method Statements (RAMS) will be developed for site activities, ensuring appropriate safety measures are in place for adverse weather conditions.	
	Staff will be provided with climate-appropriate PPE and trained in extreme weather response protocols.	
Damage to equipment from extreme weather events / climate conditions	Ensure that equipment, plant, and materials used in decommissioning meet industry standards for extreme weather resilience. Regular maintenance checks will be undertaken to ensure there are no defects that could be vulnerable to extreme weather events.	Routine inspection and maintenance of equipment and drainage infrastructure. Incident reporting for any weather-related damage.
	Existing site drainage infrastructure will be maintained during decommissioning to prevent flood-related equipment damage. Equipment will be elevated or removed from flood-prone areas where necessary and covered when stored as appropriate.	
Increased risk of flooding	A Flood Warden will be appointed to monitor site conditions and ensure timely response to flood warnings and a Flood Warning and Evacuation Plan developed.	Regular review of flood warning systems and emergency response plans.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
		Post-event evaluation of flood mitigation effectiveness.
Release of greenhouse gas (GHG) emissions from decommissioning activities, including vehicle movements	A Decommissioning Transport Management Plan (DTMP) will be prepared to optimise vehicle movements and minimise unnecessary trips. Low-emission vehicles will be encouraged prioritising the best available vehicles at the time.	Monitor fuel consumption of decommissioning plant and vehicles. Record transport emissions data in line with best practices at the time.
Embodied carbon emissions from the disposal of decommissioned materials	Prioritise the recycling and re-use of materials, including PV panels, mounting structures, inverters, transformers, and BESS units. Work with accredited recycling and waste management facilities to minimise landfill waste.	Conduct waste audits to track the proportion of materials re-used and recycled.
Fugitive emissions of sulphur hexafluoride (SF6) from gas-insulated electrical equipment	SF6-free electrical components will be prioritised wherever feasible to eliminate emissions from gas-insulated switchgear and transformers. For any equipment that uses SF6, only sealed-for-life components with extremely low leakage rates will be used to minimise fugitive emissions. Routine inspections of electrical equipment will be conducted to detect and prevent leaks. End-of-life disposal of SF6-containing equipment will follow best practice handling procedures to prevent atmospheric release.	Regular equipment inspections to ensure SF6 containment integrity. Monitoring and reporting of SF6 usage, leakage rates, and disposal practices.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Generation of waste materials from decommissioning activities	An **outline Waste Management Plan [EN010141/DR/7.12]** has been prepared and will be developed into a final Waste Management Plan prior to the start of decommissioning phase in accordance with a Requirement of the **draft DCO [EN010141/DR/3.1]**. The waste hierarchy will be applied, prioritising waste prevention, reuse, and recycling before disposal. All waste will be transported by licensed waste carriers and disposed of at facilities with the necessary permits.	A waste register will be maintained, tracking all waste streams, quantities, and destinations.
Contamination risks from improper waste handling (e.g., hazardous waste, chemicals, and oils)	Hazardous waste (e.g., oils, batteries) will be segregated and stored in designated secure containers. Spill response procedures will be in place to manage accidental releases. All hazardous waste will be removed by licensed contractors, in accordance with prevailing waste regulations at the time of decommissioning.	Regular site inspections to verify compliance with hazardous waste handling procedures.
End-of-life waste from solar panels and battery storage systems	Solar panels will be dismantled and sent to specialist PV recycling facilities, where materials such as silicon cells, polymers, and metals will be recovered. Battery Energy Storage Systems (BESS) will be refurbished, repurposed, or recycled where feasible, reducing disposal requirements. Transformers and inverters will be either reused or sent for metal recovery at authorised recycling facilities. Cabling will be either reused or sent for recovery at authorised recycling facilities.	Documentation of panel and battery disposal or repurposing. Periodic review of emerging recycling technologies to maximise material recovery.

6.0 IMPLEMENTATION OF MANAGEMENT PLAN

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

- The team roles and responsibilities, and 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;
- Detail of the communication strategy (stakeholders and third parties);
- Detail of the required training for key personnel on environmental topics relevant to the Scheme and final DEMP. This will include detail on toolbox talks and on-site briefings required to ensure that relevant staff and site operatives are aware of the requirements for environmental control and procedures for the same, and that they have the necessary knowledge to deliver them;
- Detail of measures to ensure that staff and personnel are advised of changes to circumstances as work progresses on decommissioning the Scheme; 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 final DEMP, monitoring and reporting will take place throughout the decommissioning 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 final DEMP.

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 final DEMP, 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 final DEMP. They will also undertake regular inspections as required by the final DEMP and overall audits of the DEMP to ensure compliance with its requirements. They will also meet regularly with the Decommissioning Project Manager to discuss the decommissioning 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. 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 in a logbook available for inspection on request by the Local Planning Authorities.

7.1.3 Where complaints are received from members of the public these will be logged by the Decommissioning Project Manager in a record keeping system. These logs will include details of the complaint, and actions arising from the same.

7.1.4 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.

7.1.5 All complaints will be reviewed by the Decommissioning Project 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 by the Principal Contractor. These will be certified in line with the ISO 14001 standards (or any equivalent standard in place at the time of decommissioning).

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 decommissioning phase of the Scheme, and that corrective actions are undertaken.

7.2.3 A central record keeping system will be established (by the Project Quality Administrator, 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 final DEMP and measures therein. These would include the following records as a minimum:-

- Licenses, approvals, and other similar regulatory documentation.
- Environmental surveys.
- Environmental equipment test records.
- The Environmental Action Schedule.
- Records of routine site inspections.

- Details of incidents, breaches of the DEMP, or complaints from third parties, and corrective action taken in respect of the same.

7.2.4 A full review of the DEMP will be undertaken at 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 be added to the DEMP, or amendment to existing measure or mitigation, then these changes will be made only after prior agreement from the Local Authorities.

7.2.5 The records held in respect of the DEMP will be made available for the purposes of monitoring compliance with the DEMP where a request is made by a Local Planning Authority, the Environment Agency, Natural England, or Historic England (or any equivalent successor bodies).