



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)

September 2026

Version P06

EAST PARK ENERGY

Planning Act 2008

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

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

Version	Date	Status
P01	September 2025	DCO Submission
P02	April 2026	Deadline 1
P03	May 2026	Deadline 3
P04	July 2026	Deadline 4
P05	August 2026	Deadline 6
P06	September 2026	Deadline 8

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CONTENTS

1.0	Introduction	3
1.1	Background	3
1.2	Document Structure	4
1.3	Relationship with Other Management Plans.....	5
2.0	Scheme description	9
2.1	The Scheme	9
2.2	The Site	9
2.3	Site Context.....	11
2.4	Operational Phase Activities.....	13
3.0	Roles & responsibilities.....	27
3.1	Site Team	27
3.2	Stakeholders	28
4.0	Operational Environmental Management.....	30
5.0	Environmental Mitigation Measures	42
6.0	Implementation of Management Plan	62
7.0	Monitoring and Maintenance.....	63
7.1	Monitoring.....	63
7.2	Record keeping	64
Appendix A: Other plans to form part of the final OEMP		66
Appendix B: Operational Access Strategy		72

TABLES

Table 2.1:	Indicative Operational Lifespan of Scheme Components
Table 5.1:	Summary of the operational mitigation and management measures – Landscape and visual
Table 5.2:	Summary of the operational mitigation and management measures – Cultural Heritage
Table 5.3:	Summary of the operational mitigation and management measures – Ecology
Table 5.4:	Summary of the operational mitigation and management measures – Hydrology and Flood Risk

Table 5.5:	Summary of the operational mitigation and management measures – Traffic and Transport
Table 5.6:	Summary of the operational mitigation and management measures – Noise and Vibration
Table 5.7:	Summary of the operational mitigation and management measures – Air Quality
Table 5.8:	Summary of the operational mitigation and management measures – Ground conditions
Table 5.9:	Summary of the operational mitigation and management measures – Land and Soils
Table 5.10:	Summary of the operational mitigation and management measures – Socio economics
Table 5.11:	Summary of the operational mitigation and management measures – Climate change
Table 5.12:	Summary of the operational mitigation and management measures – Waste

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 This oOEMP is a control document that will be certified by the Secretary of State as part of the DCO and implemented via Requirement 9 of the draft DCO [EN010141/DR/3.1]. Should the Scheme be consented, the final

OEMP(s)¹ produced for any phase of the Scheme will be in substantial accordance with this oOEMP, and approved by the relevant local planning authority (LPA) in consultation with the relevant statutory nature conservation body and the Environment Agency.

- 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.
- 1.1.7 This oOEMP has been prepared having regard to the **Technical Note on Replacement Works [REP3-075]**. The controls in this oOEMP apply to all operational maintenance, repair, renewal and replacement activities, including the replacement of solar panels, mounting structures, inverters, transformers, battery storage units, cabling, fencing and CCTV.

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;

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

- **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, and making information available to registers and the local planning authority as required.

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, 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.
- **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.

1.3.3 In addition to the documents identified above, which will be submitted separately from the final OEMP, the following plans referenced in this oOEMP

will be prepared and incorporated into the final OEMP, either within its main body or as appendices, as appropriate:

- **Communications Strategy;**
- **Ecological Reasonable Avoidance Measures;**
- **Emergency Response Plan;**
- **Environmental Incident Management and Pollution Prevention Plan;**
- **Flood Warning and Evacuation Plan;**
- **Invasive Non-Native Species Management Plan;**
- **Major Replacement Campaign Method Statement and Environmental Review** (if required, see Section 2.4);
- **Operational Noise Assessment;**
- **Operational Noise Management Plan;**
- **Supply Chain Carbon Reduction Plan;**
- **Unexpected Contamination Protocol;** and
- **Watercourse and Groundwater Quality Monitoring Plan.**

- 1.3.4 The purpose of each of these documents is set out in **Appendix A** to this oOEMP.
- 1.3.5 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly (as a minimum annually) by the Site Manager, Environmental Manager, and relevant regulatory and local planning authorities. Monitoring results will be documented as part of the compliance framework for the operational phase.
- 1.3.6 If the DCO is granted, each of the above plans will be developed into a final document, with approval by the relevant LPA prior to the date of final commissioning for any phase of the authorised development (following consultation with the relevant bodies on each plan as set out in the DCO).
- 1.3.7 The final OEMP and the associated management plans will be reviewed and updated periodically (as a minimum annually) to ensure continued compliance with statutory and regulatory requirements and best practice standards.

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- 1.3.8 All approved management plans applicable to the operational phase will apply to repair, renewal and replacement activities where relevant. A Major Replacement Campaign Method Statement and Environmental Review approved under Section 2.4 will supplement, and must remain consistent with, the approved OEMP and the other relevant approved management plans.

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 Operational Phase 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 a maximum of 40 years, with decommissioning assumed to be no earlier than 2070.

Operational Workforce and Activities

- 2.4.2 The day-to-day management and maintenance of the Scheme will be co-ordinated from the 'Operations and Maintenance Area' in Site D which includes a storage, operations and maintenance building. The purpose of this area is the storage of site management and maintenance equipment, which will include plant and machinery not only for maintaining the infrastructure components of the Scheme, but also for maintaining the extensive habitat and landscape proposals.

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- 2.4.3 The operational access to the Operations and Maintenance Area will use the main site access from the B645 (identified as SA16 on ES Vol 3 Figure 2-4d [EN010141/DR/6.3]). All deliveries to Site during the operational phase would in the first instance be to the Operations and Maintenance Area, where plant, equipment and machinery would typically be unloaded to the storage, operations and maintenance building and held ready for distribution elsewhere within the Site, as required.
- 2.4.4 For routine maintenance operations, including replacement campaigns, there would not be a requirement for the construction compounds used during the construction phase. These construction compounds would have been removed at the end of the construction phase and would not be re-established until the decommissioning phase. Instead, the laydown area for components would be between the rows of panels or for other equipment existing hardstanding areas. In addition, there would be no requirement to construct new access tracks or access points from the highway network to facilitate replacement campaigns.
- 2.4.5 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.
- 2.4.6 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

2.4.7 Along the cable corridors activity will comprise routine inspections and any reactive maintenance, for instance where a cable has become damaged.

2.4.8 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.

Replacements

- 2.4.9 As set out above, during the operational phase of the Scheme, periodic replacement of equipment will be necessary to maintain operational efficiency and reliability. Periodic repair, renewal, and replacement of components are anticipated operational activities. Components may require replacement because of failure, damage, deterioration, the end of their practical service life, changes in safety or regulatory requirements, obsolescence, lack of compatible spare parts or technological advances which would improve the efficiency or reliability of the Scheme.
- 2.4.10 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.
- 2.4.11 For the purposes of the OEMP:
- **Routine Replacement Works** means isolated or reactive replacement of individual components, panels, strings or small groups of panels arising from faults, damage or localised underperformance.
 - **Planned Panel Replacement Campaign** means a coordinated programme of solar panel replacement which, together with all other panels replaced during the relevant rolling 12-month period, would not exceed 20% of the solar panels installed within the Scheme.
 - **Major Replacement Campaign** means one or more planned campaigns of solar panel replacement activities which, individually or cumulatively, would result in more than 20% of the solar panels installed within the Scheme being removed and replaced within any rolling 12-month period.

Replacement register and threshold calculation

- 2.4.12 The Site Operator will record the number and mapped location of the solar panels installed at final commissioning of each phase and at final commissioning of the Scheme as a whole.
- 2.4.13 A Replacement Register will thereafter be maintained recording the date, number, type and location of all components replaced. For solar panels, the register will show the cumulative number and percentage of panels replaced within each rolling 12-month period.
- 2.4.14 All solar-panel replacements will count towards the 20% threshold, including Routine Replacement Works and works undertaken under separate contracts or programmes.
- 2.4.15 No replacement work may be authorised where it would cause the cumulative total to exceed 20% within a rolling 12-month period unless the Major Replacement Campaign approval required below has first been obtained.
- 2.4.16 This restriction will not prevent emergency work required to make equipment safe or prevent immediate environmental harm. Where emergency replacement work causes or is likely to cause the threshold to be exceeded, the relevant planning authority will be notified as soon as reasonably practicable and no further non-emergency replacement work will proceed pending approval.
- 2.4.17 Impacts (including to highways) from Routine Replacement Works and Planned Panel Replacement Campaigns will be limited by virtue of their scale and the nature of works undertaken. These impacts will be controlled by the measures set out in this oOEMP, supplemented by the specific controls outlined in this section.

Existing infrastructure, compounds and laydown

- 2.4.18 Replacement activities will use the established operational accesses, internal tracks, Operations and Maintenance Area and other operational infrastructure.
- 2.4.19 Replacement works will not require:
- new permanent access tracks or accesses;
 - re-establishment of the construction compounds;
 - new areas of permanent hardstanding or permanent staff parking;
 - new array foundations or an expansion of the panel-support footprint;
 - new below-ground cable routes;
 - significant earthworks; or
 - vegetation clearance to create access or working areas.
- 2.4.20 Replacement works requiring any activity listed in paragraph 2.4.19 must not be undertaken unless they are authorised by the DCO and any approval required has first been obtained.
- 2.4.21 The Operations and Maintenance Area in Site D will be the primary logistics hub for replacement works. Bulk deliveries of solar panels, general replacement components, plant and equipment will first be made to that area before onward distribution around the Scheme.
- 2.4.22 Direct delivery to an individual work area will only take place where reasonably required by the size, weight or handling requirements of the component and where the delivery accords with the approved operational access arrangements.
- 2.4.23 Temporary laydown will be limited to:
- the Operations and Maintenance Area;
 - existing hardstanding or access tracks; or
 - suitable areas between panel rows within the defined work area.

2.4.24 Where ground conditions require it, temporary ground-protection matting will be used to avoid compaction, rutting or damage to grassland and soils. Matting, temporary materials and facilities will be removed and the affected land inspected and reinstated promptly following completion of the relevant works.

2.4.25 If any temporary closures or diversions to public rights of way are required to enable maintenance activities to be undertaken, these would be agreed in advance with the relevant local highway authority, in accordance with the **outline PRowMP [EN010141/DR/7.8]**.

Crew numbers and duration

2.4.26 A panel-replacement crew will comprise no more than five operatives directly engaged in panel replacement, consisting of:

- three panel technicians;
- one handling, materials or telehandler operative; and
- one quality or electrical engineer

2.4.27 The following crew controls will apply across the Scheme:

- A Planned Panel Replacement Campaign will use a minimum of two and a maximum of five crews operating simultaneously.
- A Major Replacement Campaign involving more than 20% but no more than 50% of the panels within a rolling 12-month period will use a minimum of three crews.
- Where more than 50% of the panels are proposed to be replaced within a rolling 12-month period, the campaign will proceed on the starting basis of five crews.
- No more than five panel-replacement crews will operate simultaneously unless a greater number has been expressly approved in writing as part of a Major Replacement Campaign.

2.4.28 Where more than five crews are proposed, the Major Replacement Campaign submission must:

- state the proposed maximum number and composition of crews;
- identify the maximum number and location of simultaneous work areas;
- quantify the associated workforce, daily panel throughput, plant, staff vehicles, delivery vehicles and waste movements;
- identify any additional mitigation, monitoring and reporting; and
- demonstrate that the proposed deployment would not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement.

2.4.29 Any approval permitting more than five crews will specify the maximum number of crews and any associated limits on simultaneous work areas, workforce, vehicle movements, working hours and environmental controls.

Duration and Phasing

2.4.30 Planned Panel Replacement Campaigns and Major Replacement Campaigns will be undertaken on a phased, sequential and localised basis.

2.4.31 The overall Scheme-wide programme shall therefore not be treated as the duration of effects at every receptor. Works will progress sequentially so that the duration of activity at an individual work area, access, settlement or environmental receptor is materially shorter than the overall campaign.

2.4.32 Unless otherwise approved through the Major Replacement Campaign procedure:

- all active panel-replacement crews will operate within the area served by a single operational Site access on any working day;
- each crew will operate within a defined work area and will progress systematically through that area;
- completed areas will be cleared and reinstated before crews progress to subsequent areas, so far as reasonably practicable;

- unnecessary dispersed or uncoordinated working across the Scheme will be avoided;
- the number of accesses and local highway routes affected simultaneously will be minimised; and
- the programme will minimise the duration of activity at individual receptors and settlements.

Vehicle Movements

- 2.4.33 Replacement traffic will use the operational access routes identified on the Operational Access Strategy Plan provided as **Appendix B**. Existing internal tracks will be used once vehicles enter the relevant Site area.
- 2.4.34 Bulk deliveries of replacement solar panels will be made to the Operations and Maintenance Area in Site D. Onward distribution to the active panel-replacement area will ordinarily use an 18-tonne rigid vehicle, or an equivalent vehicle suitable to access the delivery location. For routine maintenance works and replacement of inverters and transformers Site C would be accessed from Site D using the B645 and then Moor Road to access SA13. During a Planned Panel Replacement Campaign or Major Replacement Campaign, Site C would be accessed from SA12 on Great Staughton Road.
- 2.4.35 Where five crews are operating no more than ten loaded panel-distribution deliveries will be made from Site D to the active work area on any working day and each loaded delivery may make a corresponding return journey to Site D.
- 2.4.36 This equates to a maximum of ten rigid-vehicle round trips or twenty one-way rigid-vehicle movements through the active operational access on any working day. Proportionately lower limits will apply where fewer crews are operating.
- 2.4.37 Redundant panels will be loaded onto vehicles returning from the work area and returned progressively to the Operations and Maintenance Area. They will not be stockpiled across the wider Scheme.

2.4.38 Vehicle loads will be consolidated and available vehicle capacity used efficiently, so far as reasonably practicable and consistent with safe loading, axle weights, product protection, vehicle manoeuvrability and access constraints.

2.4.39 Due to the presence of Great Staughton Primary School on Causeway Road, delivery movements which pass the school will be scheduled to occur outside of highway peak hours and school pick-up and drop-off times.

Major Replacement Campaign approval

2.4.40 The OEMP will provide that no Major Replacement Campaign will commence until a Major Replacement Campaign Method Statement and Environmental Review has been submitted to and approved in writing by the relevant planning authority or authorities.

2.4.41 The submission will provide details of the management measures that are proposed to be put in place for those replacement activities. Those measures must remain consistent with the approved OEMP and all other relevant approved management plans and, where relevant, have regard to the controls contained in the approved CEMP and CTMP, and shall identify, insofar as relevant:

- the components and number of panels to be replaced;
- the calculation of the percentage of the as-built panel total;
- the parts of the Scheme, defined work areas and operational accesses affected;
- the anticipated commencement, completion, duration and phasing;
- working days and hours;
- workforce, crew numbers, crew composition and welfare;
- proposed panel throughput;
- staff, delivery, collection and waste vehicle movements;
- vehicle types, routes, accesses, booking arrangements and traffic management;

- temporary laydown, storage, ground protection, parking, soil management and reinstatement;
- measures relating to PRow, ecology, soils, drainage, flood risk, pollution prevention, noise, vibration, dust, air quality, lighting, landscape and visual amenity, archaeology, heritage and local residents;
- pre-works surveys, licences and environmental checks;
- stakeholder liaison and community communication;
- monitoring, inspection, reporting, corrective action and stop-work arrangements;
- material changes in the environmental baseline, legislation, guidance or surrounding development context; and
- all other repair, maintenance or replacement activities anticipated during the same period, so that cumulative effects are considered.

Other component and BESS replacement

2.4.42 Replacement of other Scheme components would generally involve a smaller workforce and fewer vehicle movements.

2.4.43 Their replacement will nevertheless remain subject to:

- the OEMP;
- the relevant topic-specific management plans;
- the Operational Access Strategy; and
- applicable highway-authority notification requirements.

2.4.44 During a BESS replacement campaign, no more than one BESS unit will be delivered to the Scheme in any working day. BESS replacement will be undertaken in accordance with the approved BSMP, Emergency Response Plan, OEMP and waste-management arrangements.

Panel Cleaning

2.4.45 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.

- 2.4.46 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.
- 2.4.47 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.
- 2.4.48 Where panel cleaning is required during the operational phase, this will be undertaken during working hours using water and mechanical brushing only. No chemical cleaning agents will be used for panel cleaning.

Vehicular Access

- 2.4.49 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.
- 2.4.50 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

- 2.4.51 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 will be 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, including in the event of any temporary closures or diversions required to facilitate maintenance activities (which would require the approval of the local highway authority in advance).

Vegetation Management

- 2.4.52 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 (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]**.
- 2.4.53 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]**.
- 2.4.54 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.

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 shall 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. The Environmental Manager will also undertake the interface role with Rothamsted Research in relation to the Agrisolar Research Area.
- **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 and as required instructing surveys of the works in relation to habitats (including for BNG), 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.
- **Traffic Co-ordinator** – Responsible for co-ordinating operational vehicle movements, deliveries and collections; ensuring compliance with approved routes, booking arrangements and timing restrictions; preventing vehicles from waiting on the public highway; managing interactions with PRow users; maintaining traffic records; and liaising with relevant authorities and Site personnel.

3.1.2 As a minimum the above roles and responsibilities are likely to be required to support implementation of the OEMP. The requirement for additional roles and details of responsibilities 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.

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, public holidays 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 shall 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.

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 manage 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 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 stored within 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 (PRoW) cross the Site or are affected by operational activity (e.g. vegetation maintenance activity, routine maintenance of PRoW, or where they cross access roads) then works will be fully 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 operational phase. 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 ensures that the landscaping, habitat and 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 by the Site Manager 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 request. Any spill or suspected pollution incident involving 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 from the public highway, signage will be maintained throughout the operational phase setting out required conduct within the Site's boundaries (e.g. speed limits, warning of possible hazards etc.). Signage will be erected at any point where an access track 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 shall not be accessed by the public and setting out the risks of entry. Signage will be inspected and maintained or replaced as necessary to ensure visibility, legibility, and continued good working order at all times.
- 4.1.21 Where necessary, and to ensure the safety of the public and site operatives, signage shall 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.

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- 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.
- 4.1.24 Risk assessments and methods statements will be produced for all activities and they will be site-specific. Site 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 Site 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. Parking by operatives undertaking maintenance, repair, renewal and replacement activities will not be permitted on the public highway.
- 4.1.27 Deliveries and collections of material to and 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.

- 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, removable 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.

Lighting

- 4.1.35 During the operational phase 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 Sensitive ecological receptors upon which lighting control measures will be implemented include:
- Non-statutory designated sites for nature conservation, including Huntingdon Wood Local Wildlife Sites and Kangaroo Meadows LWS;
 - Field boundary features including hedgerows, trees, woodland, ditches and watercourses;

- Retained individual trees;
- Ponds; and
- Badger setts.

4.1.39 Additional sensitive ecological receptors may also be identified at any time during the operational phase of the Scheme, in which case they must be reported to the Site Manager and the OEMP updated accordingly.

4.1.40 As set out in Section 2.4 of this oOEMP, where solar PV panel cleaning is required, it will be undertaken when the panels are cool and may therefore take place at night. Where cleaning is undertaken at night, the tractor-mounted cleaning system will use headlights and directional task lighting while travelling along the panel rows.

Utilities

4.1.41 Due to the nature of the Scheme, it is not anticipated there would be any works that will 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.

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

Emergencies, Fire Plan, and Special Site Instructions

4.1.43 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.

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

- 4.1.45 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.
- 4.1.46 At site induction all personnel must be advised of the firefighting equipment on site and the escape routes and procedures.

Certification of Mobile Plant

- 4.1.47 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

- 4.1.48 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.
- 4.1.49 Detail of measures to minimise, re-use, and control waste are set out in the **outline Waste Management Plan (oWMP) [EN010141/DR/7.12]**. A final Waste Management Plan will be prepared in substantial accordance with the oWMP must be prepared and approved by the relevant local planning authorities prior to each phase of the authorised development.

Surface water management

- 4.1.50 An **outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]** sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. It 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.

- 4.1.51 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.
- 4.1.52 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

- 4.1.53 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]**.
- 4.1.54 To manage the residual risk of flooding to site operatives a Flood Warning and Evacuation Plan will be developed as part of the final OEMP submitted for approval 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

- 4.1.55 Neighbouring residents will be informed about any substantial maintenance, repair, or replacement work on the Site throughout the duration of the operational phase via the CLG. Regular communications will be sent to them to provide updates on such work, any changes that may occur (e.g. due to 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.
- 4.1.56 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 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.
- 4.1.57 A project website will be maintained throughout the operational phase 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.
- 4.1.58 Any enquiries or complaints arising 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).

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- 4.1.59 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

- 4.1.60 The Site Operator will register to the voluntary 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

- 4.1.61 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 outline Landscape and Ecology Management Plan (oLEMP) [EN010141/DR/7.7] establishes measures to protect and maintain existing vegetation, ensuring that retained vegetation is safeguarded throughout the operational phase.	Monitoring will be undertaken through the approved LEMP. This will include: • Minimum of quarterly site walkovers; • Minimum of annual surveys of existing trees; and • Minimum of annual inspections in September of proposed woodland, hedgerows and individual trees during the first five years after planting. Damage, planting failures, replacement planting and other remedial action will be recorded. No separate OEMP vegetation survey
	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
		will be required that that required through the approved LEMP.
Visual impact of the development from surrounding areas	Woodland, hedgerows and individual trees provided for landscape integration and screening will be maintained to achieve the aims of the approved LEMP. •	Vegetation will be reviewed in accordance with the monitoring requirements of the approved LEMP. Where monitoring identifies that planting is not establishing or is not achieving the relevant LEMP aims, remedial management, infill planting or replacement planting will be undertaken.
Glint and glare from solar panels	Solar PV panels will be fitted with anti-reflective coatings to reduce glint and glare.	Review of any complaints related to glare and adjustments made if necessary.
	Planting will be implemented in accordance with the approved LEMP, which must be in substantial accordance with the oLEMP as secured by Requirement 4 of the draft DCO. The final landscape proposals must be in substantial accordance with the Illustrative Landscape Proposals presented in Appendix A of the oLEMP [EN010141/DR/7.7] , which incorporate the necessary mitigation identified in the Glint and Glare Assessment.	The time, location, weather conditions and affected panel area will be recorded. The relevant panels and screening vegetation will be inspected and the conclusion and any corrective action recorded.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
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, including for periodic replacements	An outline Public Right of Way Management Plan [EN010141/DR/7.8] has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction and maintained through the operational phase in accordance with a Requirement of the draft DCO [EN010141/DR/3.1]. 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.	Minimum of quarterly inspections of PRow routes within the site. 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

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	The oLEMP [EN010141/DR/7.7] 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. Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.	Planting will be monitored through the approved LEMP. Any complaint or incident relating to the setting of a heritage asset will be reviewed by the Environmental Manager and, where necessary, a suitably qualified heritage professional. The findings and any corrective action will be recorded.
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.	Archaeological monitoring will be undertaken where required in accordance with the approved Archaeological Mitigation Strategy or any written scheme of investigation.

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
Potential habitat loss or disturbance to wildlife through management and maintenance activities on site. Indirect and direct impacts to on-site habitats.	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. The oLEMP [EN010141/DR/7.7] 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. 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. Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oOEMP.	An EcoCoW will be appointed for the operational phase who will review and monitor all works on Site. Appropriate survey/s undertaken, and compliance with measures regularly recorded in accordance with the approved LEMP. Records to be kept of habitat maintenance and remedial actions taken, in accordance with the requirements of the approved LEMP. Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.
	Task-specific lighting will be used only where necessary and will be installed to avoid light spill into sensitive habitats (e.g., woodland, hedgerows, and watercourses).	
	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.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disturbance to protected and notable species through management and maintenance activities or replacements	Before an activity that could affect protected species begins, the EcoCoW will determine whether a survey, timing restriction, exclusion area, licence or other control is required. If a protected species, active nest or evidence of a protected species is found, work will stop in the affected area and will not resume until the EcoCoW confirms that the required measures are in place.	Monitoring will be undertaken in accordance with the requirements of the approved LEMP.
	The location and specification of mammal gates or gaps in perimeter fencing will be set out in the final LEMP and they will be retained and maintained throughout the operational phase.	
Spread of Invasive Non-Native Species (INNS) through management and maintenance activities or replacements	An Invasive Non-Native Species (INNS) Management Plan will be developed to control and, where possible, eradicate INNS. Training will be provided to site staff to ensure compliance with biosecurity measures, including cleaning equipment before and after use in affected areas. Any soils containing INNS will be managed in line with regulatory requirements and disposed of appropriately.	INNS will be checked during the quarterly LEMP walkovers and before and after work in any known affected area. The location, treatment, biosecurity measures and any subsequent regrowth will be recorded. Regrowth or further spread will trigger additional treatment and a review of the control measures.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon water quality from run-off from hardstandings and structures. Impact of surface water flows upon watercourses from new hardstandings.	The oSWMP [EN010141/DR/7.13] 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. The surface water management measures must then be maintained and operated per the SWMP.	Drainage features will be regularly monitored to ensure that they are operating effectively, in accordance with the approved SWMP. A watercourse quality monitoring plan will be provided for the construction phase and post construction (operational phase), which will involve both visual assessments and quality testing.
Chemical and fuel spillages resulting in pollution of watercourses and/or ground water	Equipment and spill kits will be provided to contain and clean up any spills to minimise the risk of pollutants entering watercourses. Where fuel, oil or solvents are stored temporarily on the Site, the containers will be stored in covered and bunded areas with impermeable surfacing. Additional spill-prevention and containment measures will be implemented during plant operation in any area where fuels or chemicals are stored. 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 coordinate remedial actions.	Following any fire or similar incident, the operation of the sluice gate and containment system, the collection and off-Site treatment of contaminated water and any corrective action will be recorded and reported in accordance with the Battery Safety Management Plan and Emergency Response Plan.
Uncontrolled release of fire water in the event of a fire	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 outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] which will be developed into	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	a final BSMP prior to construction, as secured by a Requirement of the draft DCO [EN010141/DR/3.1]. The Emergency Response Plan (ERP) will include steps to ensure that fire water is contained within the site in the event of a fire for testing, and then for its subsequent treatment, and will be prepared in consultation with Cambridgeshire Fire and Rescue Service and the Environment Agency.	
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. The sewage system for the storage, operations and maintenance building will be maintained and managed in accordance with manufacturer's requirements. 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.	
Risk of flooding to Site Operatives	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, in accordance with a Flood Warning and Evacuation Plan.	Monitoring of flood events by the Flood Warden and recording of responses to these and the effectiveness of measures taken.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Movement of vehicles for operational maintenance activities and replacements.	Routine operational maintenance will generally generate a low level of traffic, comprising staff vehicles and a small number of service and delivery vehicle movements. Periodic replacement activities may generate HGV and other delivery movements, which will be managed in accordance with the operational access arrangements and the measures below. Where more than 20% of the solar panels are proposed to be replaced within any rolling 12-month period, the notification and approval process in paragraphs 2.4.40-41 will apply. The Site accesses, internal access tracks, visibility splays and parking area at the storage, operations and maintenance building will be maintained throughout the operational phase. Replacement components will be delivered and distributed using the operational routes and Site accesses identified in the Operational Phase Access Strategy at Appendix B of this oOEMP. Prior to any planned replacement of a centralised inverter or solar transformer within Site A, Site B or Site C, the Site Operator must notify the relevant local highway authority or authorities at least 28 days in advance. The notification must identify the proposed replacement programme, the vehicle type and anticipated number of deliveries, the proposed route from Site D to the relevant work area, the proposed delivery times, any traffic-management measures to be implemented and any other replacement activity expected to use the same route during that period. Where operational delivery movements associated with maintenance, repair or replacement activities are required to use Causeway Road past Great Staughton Primary School, those movements will be scheduled outside the highway peak periods of 08:00–09:00 and 17:00–18:00 Monday to Friday and outside school drop-off and pick-up periods on school days. The relevant school drop-off and pick-up periods will be specified in the final OEMP, having regard to the operating hours of Great Staughton Primary School and any relevant advice from the local highway authority.	Before any replacement campaign involving HGVs or 18-tonne delivery vehicles begins, the Site Manager will confirm and record the applicable route, Site access, delivery programme, timing restrictions and any highway-authority notification or traffic-management requirements. During a replacement campaign, a daily delivery record will identify the date, vehicle type and registration, Site access, scheduled and actual arrival and departure times, and any departure from the identified route or timing restrictions. The relevant Site access and adjoining highway will be visually checked during the replacement campaign for any obstruction, mud, debris or damage attributable to the works. Any required cleaning or repair will be recorded and undertaken as soon as reasonably practicable. Any breach of the routing or timing restrictions, complaint, near miss or highway-safety issue will be investigated and the corrective action taken will be recorded.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
		Where paragraphs 2.4.40-41 apply, any additional traffic monitoring or reporting specified in the Major Replacement Campaign Method Statement and Environmental Review will also be undertaken.
Impact upon users of PRow within the Site.	An outline Public Right of Way Management Plan [EN010141/DR/7.8] 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 draft DCO [EN010141/DR/3.1]. This will set out measures to maintain the safety of PRow users during the operational phase of the Scheme. Where maintenance, repair or replacement traffic crosses or otherwise affects a PRow, the temporary signage, fencing, banksman or managed crossing arrangements required by the approved Public Rights of Way Management Plan or the task-specific risk assessment will be in place before the activity begins.	PRowS within the Site will be inspected quarterly and more frequently following operational maintenance or replacement activity affecting a route, a severe weather event or a report from a PRow user, in accordance with the approved LEMP and Public Rights of Way Management Plan.

Table 5.6: Summary of the operational 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 operation at noise sensitive receptors (NSR).	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 promptly, 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 and, where necessary to avoid an exceedance of the approved noise limits, will not return to normal operation until the issue has been corrected. 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 ES Volume 1, Chapter 10: Noise and Vibration [EN010141/DR/6.1]. The design as described in the operational noise assessment must be implemented as approved and maintained throughout the operation of the Scheme.	The final OEMP will identify the applicable plant noise-performance requirements, require inspection and servicing records to be retained, and require noise measurements where an inspection or complaint indicates potential non-compliance. The Environmental Manager will record each noise complaint, the investigation undertaken, the conclusion reached and any corrective action.
Impact of noise arising from maintenance and repair activities at noise sensitive receptors (NSR).	Best practicable means will be employed in accordance with BS 5228-1:2009+A1:2014, or any subsequent equivalent standard, to control noise from maintenance, repair, replacement and panel-cleaning activities, including by using properly maintained equipment and, where practicable, equipment fitted with silencers or acoustic hoods. Planned operational maintenance, repair and replacement activities will generally take place between 08:00 and 18:00 Monday to Friday and between 08:00 and 13:00 on Saturdays, with no planned work on Sundays, public holidays or bank holidays, except in an emergency or where panel cleaning is undertaken outside those hours in accordance with Section 2.4 of the OEMP. Where panel cleaning is required, it will be undertaken when the panels are cool	Noise monitoring will be undertaken by a suitably qualified person where the task-specific assessment identifies a risk of disturbance at a noise-sensitive receptor or where a complaint indicates that the noise-control measures may not be effective. For each panel-cleaning campaign undertaken outside normal working hours, the Site Manager will record the dates, hours, areas cleaned,

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	and may therefore take place at night using the tractor-mounted cleaning system described in Section 2.4. The routing and sequencing of plant and vehicles, including the tractor-mounted panel-cleaning system, will be planned to minimise the duration of noise close to noise-sensitive receptors. Engines will not be left idling unnecessarily during panel cleaning, and unnecessary reversing will be avoided. Acoustic hoods and silencers will be fitted to noisy plant where required by a task-specific risk assessment and method statement. Non-tonal 'broadband noise' reversing alarms will be used instead of tonal beepers. Local residents will be informed in advance of any planned noisy maintenance works, and before any planned panel cleaning outside the normal working hours (if undertaken) begins. The relevant LPA and residents likely to be affected will be informed of the expected dates and hours of the activity.	equipment used and any complaints received to inform future operations.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of dust arising from activities on the site, and movement of vehicles within and outside the site	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. Measures will include: • Use of suitable dust suppression measures or techniques when using cutting, grinding, or sawing equipment. • Suppression of dust/particulate matter using non-potable water where possible and appropriate. • Dry spillages to be cleaned as soon as possible after the event using suitable equipment and wet cleaning methods. • 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. • Ensure the proper maintenance of access roads, clean the highway or access roads where material is tracked onto them. • Provision and enforcement of internal site speed limit of 20mph along internal access tracks. • Ensuring that any material being carried in vehicles is properly secured and contained. • Inspection of vehicles before using public highway and removal of dust/soil where required. • 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.	Compliance with the applicable dust-control measures will be recorded for each dust-generating activity.

Table 5.8: Summary of the operational 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 operation	An Unexpected Contamination Protocol will be prepared as part of the final OEMP. 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. Any unexpected contamination will be logged, and remedial actions taken in accordance with best practice guidelines.	Compliance monitoring in accordance with the requirements set in the Unexpected Contamination Protocol.
Generation of contaminated run-off	An Environmental Incident Management and Pollution Prevention Plan will be implemented and will identify the circumstances in which the relevant regulatory authorities must be contacted. Existing drainage and SuDS features will be maintained in accordance with the approved SWMP to retain their containment and filtration functions. Relevant Site operatives will receive pollution-prevention and emergency-response training at induction and following any material change to the procedures.	Run-off will be visually monitored during and following ground-disturbing work, and sampling will be undertaken where required by the Environmental Incident Management and Pollution Prevention Plan following a suspected pollution incident.
Leaks and spillages of fuel, chemicals, or hazardous materials	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. The storage of fuels or chemicals required during the operational phase will 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 will be limited to designated re-fuelling areas and a suitably stocked spill-kit will be retained within the compound areas as part of a	Fuel and chemical storage areas, bunds, valves, separators and spill kits will be inspected at least monthly and following a delivery, spillage or extreme weather event that could have affected them. All spills, repairs, notifications and follow-up actions will be recorded and tracked to completion.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	standard construction compound requirement. Fuel storage and refuelling areas will be located at least 10 m away from the top of bank of watercourses. 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. 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 procedures to respond to a spillage, and for reporting (if required) to the Environment Agency. Equipment to be inspected at the necessary maintenance intervals to ensure that damage or leaks are identified early and repairs are made or equipment is replaced.	
Soil erosion or ground instability	Soil-management measures applicable to operational activities will be implemented in accordance with the approved Soil Management Plan. Drainage measures will be operated and maintained in accordance with the approved SWMP to prevent erosion and protect soil structure.	Ground-stability and erosion-prone areas will be inspected at least annually and following flooding, visible heavy run-off or work undertaken next to the affected area
Contamination of groundwater	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. 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.	An approved-products register will be maintained and reviewed annually and whenever a product is changed.

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	The measures set out in the outline Soil Management Plan [EN010141/DR/7.9] will be developed into and implemented through a final Soil Management Plan in accordance with Requirement 7 of the draft DCO [EN010141/DR/3.1] .	Monitoring to be undertaken in accordance with the approved SMP.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disruption to local residents, businesses, and community facility use	Measures to mitigate the effects of visual impacts during operation are outlined in Table 5.1: Landscape and visual. Measures to mitigate the effects of traffic during operation are outlined in Table 5.6 Traffic and Transport. Measures to mitigate the effects of noise during operation are outlined in Table 5.8 Noise and Vibration. Measures to mitigate the effects on air quality during operation are outlined in Table 5.10 Air Quality.	The monitoring requirements in Tables 5.1, 5.5, 5.6 and 5.7 will apply.

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.	The forecast, relevant warnings and any resulting change to the planned work will be recorded in the daily briefing or task record. Minimum annual 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	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 at the Site.	Routine inspection and maintenance of equipment and drainage infrastructure. Incident reporting for any weather-related damage.
	Equipment will be inspected and maintained at the manufacturer's recommended intervals to ensure there are no defects that could be vulnerable to extreme weather events.	
	Drainage systems will be regularly maintained to prevent flooding in accordance with the approved SWMP.	
Increased risk of flooding	This matter is dealt with in Table 5.4 in respect of measures for hydrology and flood risk	The monitoring requirements in Table 5.4 will apply.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Release of greenhouse gas emissions from operational activities and replacements	Sustainable methods of working will be adopted for maintenance activities and replacements, including: - Regular planned maintenance of the plant and machinery in accordance with the manufacturer's recommended intervals to optimise efficiency. - Implementing measures to decrease fuel use by maximising efficiencies, and avoiding engine idling. All members of the supply chain providing a carbon reduction plan where feasible. Staff and contractor travel will be managed to reduce emissions where reasonably practicable, including by encouraging car sharing, lower-carbon travel modes and use of EVs. Lower-carbon fuels, including HVO or equivalent sustainable biofuels, will be considered for operational plant where compatible and practicable. 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.	Operational electricity and fuel use and significant repair or replacement activity will be reviewed annually, and any practicable emission-reduction action identified by the review will be recorded.
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. SF6-containing equipment will be inspected at the manufacturer's recommended intervals. End-of-life disposal of SF6-containing equipment will follow best practice handling procedures to prevent atmospheric release.	An inventory of SF6-containing equipment and its applicable inspection schedule will be maintained. Any SF6 added, recovered, transferred for disposal or estimated to have leaked will be recorded and the records will be reviewed annually.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Generation of waste during maintenance activities and periodic replacements	The Waste Management Plan (WMP) approved in accordance with Requirement 6 of the draft DCO will be implemented to ensure compliance with the Waste Hierarchy (prevention, re-use, recycling, recovery, and disposal as a last resort). Waste from operational activity (site offices & welfare facilities, maintenance of vehicles, packaging from incoming materials, etc.) to be separated/segregated into main waste streams and stored securely prior to collection by an approved waste contractor. Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier. The quantities and management routes of waste generated during operation will be monitored and reviewed to identify any further measures to reduce waste and increase reuse, recycling or recovery.	Monitoring to be undertaken in accordance with the approved WMP.
End-of-life waste from solar panels and battery storage systems	Any solar panel removed during replacement will be assessed for refurbishment or reuse before it is classified as waste. Waste panels will be stored securely and managed through an authorised WEEE collection and recycling route. Battery storage units will be assessed for refurbishment, repurposing, manufacturer take-back or regeneration. Where no take-back scheme is available, waste battery cells will be sent to an Approved Battery Treatment Operator or Approved Battery Exporter, with preference given to an Approved Battery Treatment Operator. Any transformer or inverter removed during replacement will be assessed for reuse or refurbishment before it is classified as waste. Waste equipment will be managed through an authorised WEEE recycling or recovery route.	Documentation of panel and battery disposal or repurposing. Annual review of emerging recycling technologies to maximise material recovery. Available reuse, take-back and recycling outlets for solar panels and batteries will be reviewed before any replacement campaign, and the best available option at that time will be used.

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 undertake regular walkover surveys of the site to monitor compliance with the OEMP. They will undertake regular inspections as required by the OEMP and overall audits of the OEMP to ensure compliance with its requirements. They will 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 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 Register 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 on an annual basis and as required to respond to specific issues that 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).

APPENDIX A: OTHER PLANS TO FORM PART OF THE FINAL OEMP

The following plans referenced in this oOEMP will be prepared and incorporated into the final OEMP, either within its main body or as appendices, as appropriate:

- Communications Strategy;
- Ecological Reasonable Avoidance Measures;
- Emergency Response Plan;
- Environmental Incident Management and Pollution Prevention Plan;
- Flood Warning and Evacuation Plan;
- Invasive Non-Native Species Management Plan;
- Major Replacement Campaign Method Statement and Environmental Review;
- Operational Noise Assessment;
- Operational Noise Management Plan;
- Supply Chain Carbon Reduction Plan;
- Unexpected Contamination Protocol; and
- Watercourse and Groundwater Quality Monitoring Plan.

The purpose of each of these documents is set out in the Table below:

Document	Purpose
Communications Strategy	The Communications Strategy prepared for the final CEMP will be advanced into a Communications Strategy within the final OEMP. This will establish clear and proportionate arrangements for communication between the Site Operator and local residents, businesses, community bodies, relevant authorities, regulatory bodies and other third parties throughout the operational phase. It will identify responsible personnel, communication channels and notification procedures, and provide a transparent framework for issuing operational updates and managing enquiries and complaints. The Strategy will support the continuing operation of the Community Liaison Group and the role of the Community Liaison Officer. The Communications Strategy will include:

	• Roles and responsibilities for communications, including the Community Liaison Officer, Site Manager and Environmental Manager, together with an up-to-date contact directory; • Identification of relevant stakeholders and liaison arrangements, including the Community Liaison Group, parish councils, local businesses and community groups, host authorities and relevant regulatory bodies; • Detail of arrangements for the Community Liaison Group to continue throughout operation, including procedure for meetings and updates on current and forthcoming activities; • Detail of procedures for providing advance notice of maintenance, repair or replacement works, planned noisy works, and the movement of large loads; • Detail of public communication channels, including a project website and a dedicated telephone number, with an out-of-hours contact facility maintained throughout operation. • Detail of procedures for receiving, recording, investigating and responding to enquiries and complaints, including the maintenance and regular review of a Complaints Register and the identification of any necessary corrective action; and • Detail of requirements for maintaining records of communications, complaints, responses and actions, and for periodically reviewing the effectiveness of the communication arrangements.
Ecological Reasonable Avoidance Measures	The Ecological Reasonable Avoidance Measures prepared for the final CEMP will be incorporated into the final OEMP to mitigate risks to ecology during any maintenance works over the operational life of the Scheme.
Emergency Response Plan	An Emergency Response Plan (ERP) will form part of the final OEMP and Battery Safety Management Plan (BSMP) to set out the coordinated, site-specific procedures for responding to incidents and emergencies during construction, including emergencies associated with the delivery, installation, testing and commissioning of the BESS. The ERP will set out measures to protect site personnel, first responders, the public and the environment by defining emergency roles, communications, access, evacuation, shutdown, firefighting, pollution-control and recovery arrangements. It will be developed in consultation with the relevant local authority emergency planning officers, emergency services, including relevant fire and rescue services, the police, the East of England Ambulance Service, and the Environment Agency, and will be shared with the appropriate emergency services before construction begins. The ERP will include: • Detail on the scope of the ERP, Site description, relevant operational activities, personnel and working hours, and the credible emergency scenarios to be addressed;

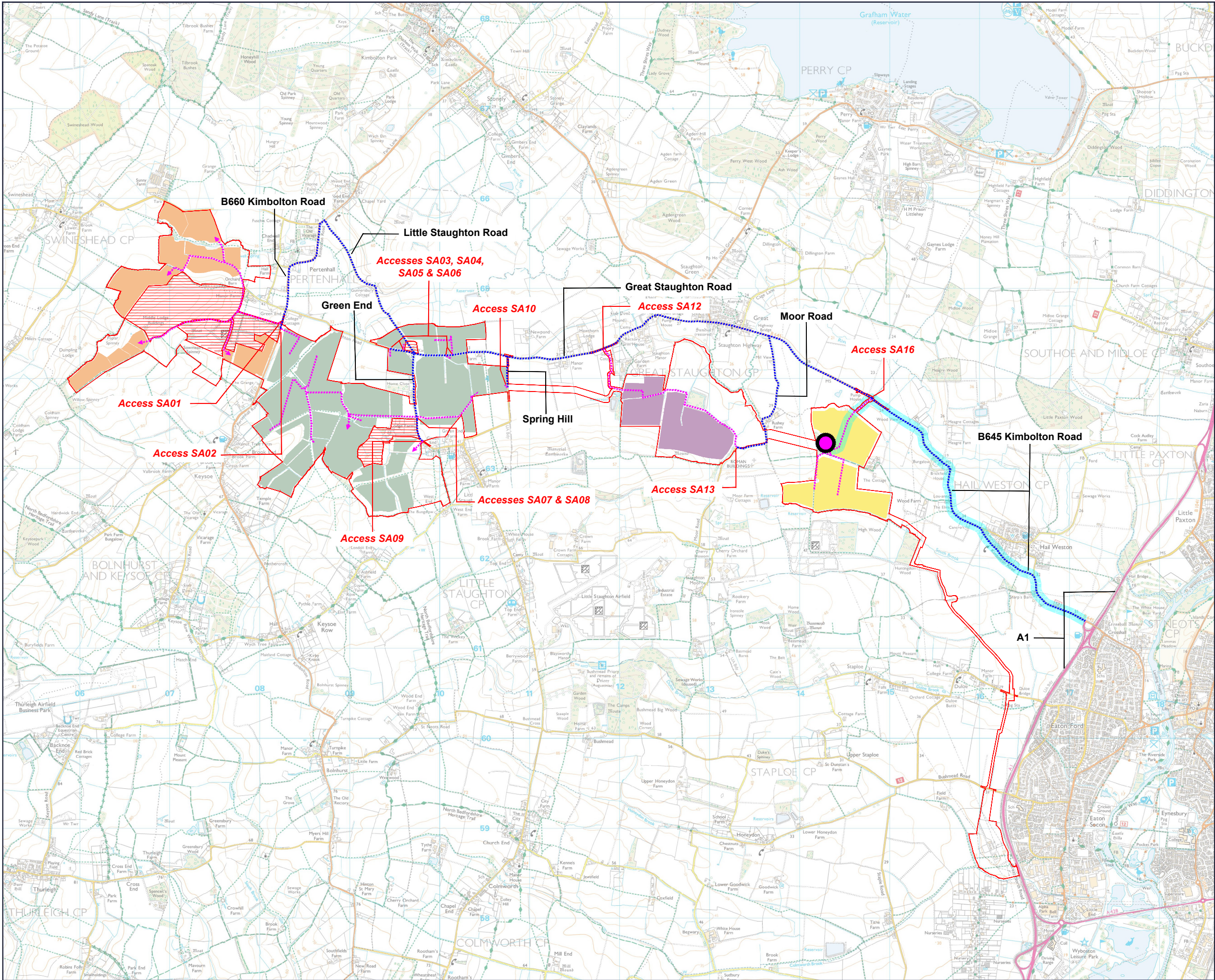
	• Detail on emergency roles, responsibilities and contact details, including the emergency response coordinator, BESS subject matter expert, relevant emergency services and regulatory bodies, and 24-hour contact and control arrangements where applicable; • Detailed about trained first-aid provision, first-aid locations and Automated External Defibrillators (AEDs), emergency access, incident escalation procedures, casualty handover and potential helicopter access locations; • Procedures covering the four stages of incident response: discovery; initial response and notification; incident actions; and resolution and post-incident actions, including reporting and escalation arrangements; • Site and emergency plans showing access and egress points, internal roads, agreed emergency routes, observation and turning areas, alarms, emergency isolators, dangerous goods, firefighting facilities and water supplies, and drainage and firewater-containment systems; • Detail on emergency-service access, site evacuation and escape procedures, emergency signage and notices, site inductions, training drills and emergency-service familiarisation, with relevant information available digitally and in hard copy on Site; • Detail on BESS-specific detection, alarm, emergency shutdown, electrical isolation and de-energisation procedures, together with the defensive firefighting and boundary-cooling strategy to be agreed with CFRS; • Detail on the environmental response procedures, including drainage isolation, containment and testing of firewater before controlled release or off-site treatment, and priority notification of the Environment Agency and relevant downstream receptors where controlled waters could be affected; • Detail of the BESS pre-delivery and pre-energisation hold points confirming that emergency access, commissioned firefighting water supplies, operational firewater containment, emergency equipment, communications, signage and response procedures are in place before battery equipment is delivered, and that integral fire-safety systems are tested before energisation; • Detail about proportionate off-site protection measures informed by the detailed-design plume analysis, including public or resident notifications and liaison regarding transport infrastructure where necessary; and • Detail about procedures for post-incident recovery arrangements addressing the potential for reignition, fire-watch requirements, de-energisation, replenishment of firefighting water, removal and disposal of damaged equipment, incident review and prompt circulation of any revisions to the ERP.
Environmental Incident	The Environmental Incident Management and Pollution Prevention Plan prepared for the final CEMP will be

Management and Pollution Prevention Plan	incorporated into the final OEMP and amended where necessary to reflect the requirements of the operational phase.
Flood Warning and Evacuation Plan	The Flood Warning and Evacuation Plan prepared for the final CEMP will be incorporated into the final OEMP to manage the residual risk of flooding during the operational phase.
Invasive Non-Native Species Management Plan	The Invasive Non-Native Species Management Plan prepared for the final CEMP will be incorporated into the final OEMP and amended where necessary to reflect the requirements of the operational phase.
Major Replacement Campaign Method Statement and Environmental Review	A Major Replacement Campaign Method Statement and Environmental Review must be submitted under the approved oOEMP in accordance with Section 2.4 if any one or more planned solar-panel replacement campaigns would, individually or cumulatively, result in more than 20% of the solar panels installed within the Scheme being removed and replaced within any rolling 12-month period. No Major Replacement Campaign will commence until the document has been submitted to and approved in writing by the relevant planning authority or authorities. Once approved, it will supplement, and remain consistent with, the approved OEMP and the other relevant approved management plans. The Major Replacement Campaign Method Statement and Environmental Review will include: • Detail of the components and number of panels to be replaced, the calculation of the percentage of the as-built panel total and the parts of the Scheme, defined work areas and operational accesses affected; • Detail of the anticipated commencement and completion dates, duration, phasing, working days and hours, with works undertaken on a phased, sequential and localised basis to minimise the duration of activity at individual receptors and settlements; • Detail of the workforce and working arrangements, including crew numbers and composition, and welfare provision; • Detail of the plant, vehicle and waste movements, any additional mitigation and monitoring, and confirmation that the work would not give rise to materially new or materially different environmental effects from those identified in the Environmental Statement; • Detail of the vehicle types, routes (in accordance with the oOEMP), accesses, booking arrangements and traffic management; • Detail of any temporary laydown areas, storage, parking arrangements, ground-protection and reinstatement arrangements, using established operational infrastructure; • Detail of any topic-specific environmental management measures over and above those already secured via the relevant approved management plans;

	• Detail of stakeholder liaison and community communication arrangements; • Detail of monitoring, inspection, reporting, corrective-action and stop-work procedures; and • An environmental review addressing any material changes in the environmental baseline, legislation, guidance or surrounding development context, together with other repair, maintenance or replacement activities anticipated during the same period so that cumulative effects are considered.
Operational Noise Assessment	An Operational Noise Assessment will form part of the final OEMP to demonstrate that the detailed design of the Scheme incorporates appropriate mitigation to achieve the operational noise rating levels set out in paragraph 10.7.6 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]. The design and mitigation described in the approved assessment will then be implemented and maintained throughout the operation of the Scheme. The Operational Noise Assessment will include: • Description of the final Scheme design, including the location and operating characteristics of the principal noise-generating plant and equipment, with reference to any submissions made under Requirement 3 of the DCO; • Identification of the relevant noise-sensitive receptors and the applicable operational noise rating levels established within ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]; • Detail of the acoustic performance requirements for operational plant and the noise data used in the assessment; • Detail of the assessment methodology, assumptions and operational scenarios used to calculate predicted noise rating levels at the relevant receptors; • Detail of any acoustic mitigation or design controls required to achieve compliance, including any requirements relating to plant selection, siting, enclosure or attenuation; • Presentation of the predicted operational noise rating levels and a clear demonstration of compliance with the limits established in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]. • Details of inspection, monitoring and maintenance arrangements for noise-generating equipment, including checks for disrepair, increased noise levels or changes in tonality, and records of the required acoustic performance and inspections; and • Detail of procedures for investigating noise complaints, including investigation by a suitably qualified practitioner where required, application of the latest version of BS 4142 or an equivalent standard, and the implementation and recording of appropriate corrective action.

Operational Noise Management Plan	A Operational Noise Management Plan (ONMP) will form part of the final OEMP to set out the site-specific controls, monitoring and communication measures that will be used to manage operational noise and, where relevant, vibration at residential and other noise-sensitive receptors, public rights of way and equestrian land uses. The ONMP will apply best practicable measures, including the principles of BS 5228, to minimise disturbance throughout operation. The ONMP will include: • Detail about plant and noise-sensitive receptors to which the controls apply; • Detail about the applicable noise and vibration criteria; • Best practicable measures, including plant selection and maintenance, silencers or acoustic hoods, switching off plant when not in use, broadband reversing alarms, appropriate routing and maximising separation from receptors; • Measures for equestrian receptors, including advance warning signage, stop-and-hold procedures, pausing non-essential noisy activities, equestrian sensitivity zones and the method of providing advance notification of short-term higher-noise works; • Procedures for investigating complaints or potential noise exceedances and implementing corrective action.
Supply Chain Carbon Reduction Plan	The Supply Chain Carbon Reduction Plan prepared for the final CEMP will be incorporated into the final OEMP and amended where necessary to reflect the requirements of the operational phase.
Unexpected Contamination Protocol	The Unexpected Contamination Protocol prepared for the final CEMP will be incorporated into the final OEMP.
Watercourse and Groundwater Quality Monitoring Plan	The Watercourse and Groundwater Quality Monitoring Plan prepared for the final CEMP will be incorporated into the final OEMP to cover the first six months of operation.

APPENDIX B: OPERATIONAL ACCESS STRATEGY



- Order Limits
- Land Excluded from Order Limits
- East Park Site D
- East Park Site C
- East Park Site B
- East Park Site A
- HGV Delivery Route
- Operational access route utilising section of existing public highway
- Indicative operational access route utilising existing access tracks or proposed new access tracks internal to the site, and which would be retained post-construction
- Storage, Operations & Maintenance Building

Note: The full extent of operational access tracks internal to the site are illustrated in ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan (APP-121)



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Project

East Park Energy

Figure Number

Figure 1

Figure Title

Proposed Operational Phase
Access Strategy

Scale

1:40,000 @ A3

Date

May 2026

