Dean Moor
Solar Farm

Environmental Statement: Appendix 5.4 – Framework Decommissioning Management Plan (FDMP)

on behalf of **FVS Dean Moor Limited**

March 2025
Prepared by: Stantec UK Ltd
PINS Ref: EN010155
Document Ref: 6.3
Revision: 1

Firma Energy

ib vogt

DEAN MOOR SOLAR FARM
ENVIRONMENTAL STATEMENT
APPENDIX 5.4 – FRAMEWORK DECOMMISSIONING MANAGEMENT PLAN
PLANNING INSPECTORATE REFERENCE EN010155
PREPARED ON BEHALF OF FVS DEAN MOOR LIMITED

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, Regulation 5(2)(a)

Project Ref:	**EN010155/ES/Appendix 5.4: Framework Decommissioning Plan**
Status:	Final
Issue/ Rev:	1
Date:	March 2025

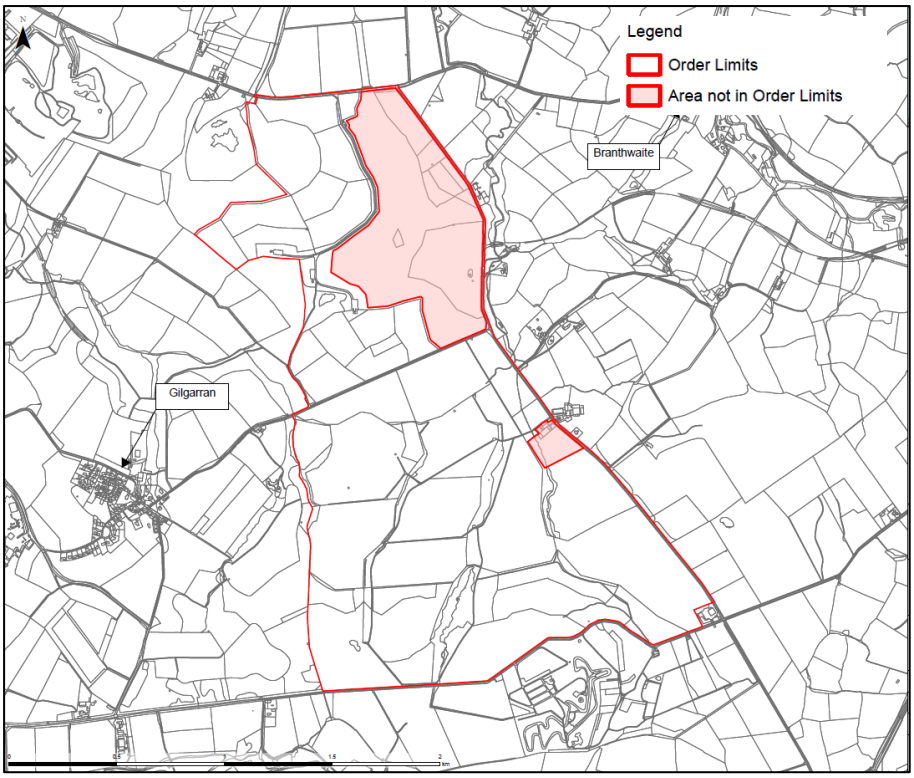
Contents

1 Introduction

1.1 Overview

1.1.1 This Framework Decommissioning Management Plan ('FDMP') has been prepared on behalf of FVS Dean Moor Ltd (the Applicant) as Appendix 5.4 of the Environmental Statement ('ES') to support a Development Consent Order ('DCO') application for the Dean Moor Solar Farm ('the Proposed Development') on land at between the villages of Gilgarran and Branthwaite in West Cumbria ('the Site'), which is situated within the administrative area of Cumberland Council ('the Council'), as shown on the Site Location Plan (ES Figure 1.1), an extract of which is shown below.

Figure 1.1: Extract of the Site Location Plan (ES Figure 1.1)



1.1.2 The Proposed Development comprises the construction, operation, and decommissioning of a solar photovoltaic ('PV') energy generating station. A full description of the Proposed Development is provided within ES Chapter 3 – Site and Proposed Development Description.

1.1.3 The Proposed Development is proposed to be temporary and to have an operational life of up to 40 years, after which the generating station equipment shall be removed, and the Site must be returned its current use.

1.2 Purpose of this Document

1.2.1 The Proposed Development's decommissioning is expected to require a suite of management plans covering topics similar to those relevant at construction. In the FDMP this future document suite will be referred to as the 'DMP' although it is envisaged that this will encompass a range of documents equivalent to those required for construction.

1.2.2 This FDMP provides a framework for a future DMP and establishes expectations and commitments for what the DMP will contain, including the minimum that should be required as an information baseline for future management plans.

1.2.3 The objective of the FDMP is to secure an approach to the future management of environmental effects and the outcomes to be achieved through the DMP suite based on information available now, and to support flexibility regarding the methodology for decommissioning as Site environmental conditions, technical/engineering options, and best practice methodologies, will evolve over the 40-year operational lifespan of the Proposed Development.

1.2.4 The purpose of this FDMP is therefore to provide a framework for the future decommissioning of the Proposed Development and restoration of the land. A framework is provided to reflect the amount of time that will elapse between the preparation of the DCO application and the time at which a document suite would be required for the management of environmental effects associated with its decommissioning. Further discussion of the context for this approach is found at section 2.1 of this document.

1.2.5 The effects of decommissioning are likely to be of a similar magnitude to those associated with construction effects and these are considered in the ES technical chapters (6-10). Construction effects assessed in the ES are supported by a range of management plans including the Outline Construction Environmental Management Plan ('OCEMP') (Appendix 5.1), Outline Construction Traffic Management Plan ('OCTMP') (Appendix 5.2), and Outline Soil Management Plan ('OSMP') (Appendix 5.3). These documents will be updated and submitted for approval prior to construction as secured by DCO Requirements and will be substantially in accordance with their outlines.

1.2.6 Also supporting the Proposed Development is an Outline Landscape and Ecological Management Plan ('OLEMP') (Appendix 7.7) which does not directly govern construction, but for which a Site restoration equivalent would be relevant to decommissioning.

1.2.7 The DMP will conform to regulations and guidance at the time of decommissioning. As a minimum it is expected to include:

a. An overview of the Proposed Development as it relates to decommissioning, decommissioning activities, and programme;
b. Detail that reflects up to date assessments of the environmental baseline coupled with relevant assessment of potential environmental effects which the DMP will manage;
c. Mitigation measures to prevent or reduce potential adverse environmental effects; and
d. Mechanisms for monitoring and securing the effectiveness of mitigation measures.

1.3 Structure of this Document

1.3.1 This section introduces the content of the FDMP. The remainder of this document includes the following:

- **Section 2** – 'Principles of Decommissioning and Environmental Management' provides the context for the approach taken by this FDMP, an overview of likely decommissioning activities, a high-level programme for decommissioning, and an overview of general content for a future DMP suite.

- **Section 3** – 'Environmental Mitigation and Management' reviews topics likely to be relevant to the DMP and establishes expectations for what the DMP will need to include in relation to each.
- **Section 4** – 'Implementation and Monitoring' sets out what is expected of a future DMP suite to ensure quality management and compliance.

  Section 5 – 'Future Steps' provides the conclusion to the FDMP in which commitments are established for how this framework will be turned into the DMP suite secured as a DCO Requirement.

1.4 The Proposed Development

1.4.1 Full details of the Proposed Development are described in ES Chapter 3 – Site and Proposed Development Description and further details of the construction and decommissioning phases are described in ES Chapter 5 – Construction and Decommissioning Methodology and Phasing.

1.4.2 The Proposed Development comprises the construction, operation, and decommissioning of solar PV energy generating station with a total capacity exceeding 50 MW comprising solar PV arrays, grid connection infrastructure, associated infrastructure and green infrastructure.

1.4.3 The Proposed Development will include the following key elements of infrastructure:

- Solar PV panels;
- Solar PV array mounting structures;
- Power Conversion System ('PCS') Units in the form of Inverters and Transformers;
- Grid Connection Infrastructure comprising Customer and DNO Substation Buildings and external electrical equipment and ancillary infrastructure within a Security Fence;
- Perimeter Fencing, Gates, CCTV cameras, electrical cabling, and other associated infrastructure;
- Access from the highway and internal access tracks; and
- Green infrastructure including landscape planting and ecological enhancements.

2 Principles of Decommissioning and Environmental Management

2.1 Context

2.1.1 To understand how this FDMP functions it is useful to provide context for the Applicant's approach in putting forward a framework and not seeking to provide a document suite for decommissioning that mirrors that which is provided for the construction phase.

2.1.2 The reason for this approach is that even though construction could occur as early as 2026, the outline documents provided for that phase (e.g., OCEMP, OCTMP, and OSMP) acknowledge the need for targeted updating of environmental assessments and levels of detail not available until closer to construction (i.e., after detailed design and procurement) before they can be provided in a final form.

2.1.3 In this context it is considered premature to provide an outline DMP document suite because it is not possible to make a legitimate outline for activities that will occur in more than 40 years, and for which there is limited baseline for how this should be done. Presently there are no established methodologies nor facilities (in the UK) to support solar farm removal and recycling. However, by the mid to late 2030s this part of the industry will become well developed as the 25-year Renewable Obligations Certificate ('ROC') schemes[1] implemented across 2012-2017 are decommissioned, and later 2020 onward 40-year projects also coming to an end in advance of the Proposed Development's decommissioning phase.

2.1.4 By the time a DMP is required for the Proposed Development there will be established best practices, opportunities to incorporate lessons learnt from other projects to inform risk assessments and method statements, and an industry to support the reuse and/or recycling of materials.

[1] ROC schemes are those that benefit from a subsidy that lasts for 25 years from the date of commissioning. For this reason, these schemes predominantly had operational lifespans of 25 years. In some instances, these were extended.

2.1.5 For these reasons a framework is provided for how the future DMP should be approached and the contents it will be expected to cover based on current knowledge and assumptions, but without limiting what it should cover in its final form based on what becomes established best practice for solar farm removal and Site restoration. To support this, the FDMP also sets out commitments for further engagement in advance of a DMP being produced, with information on this at section 4.2.

2.1.6 A core commitment of this FDMP which must be carried through into the future document suite is that the DMP will be expected to demonstrate that re-use and recycling are prioritised and that no materials which can be re-used or recycled are disposed of in any other way without a compelling justification.

2.1.7 The DMP suite will provide a level of detail necessary to show what will be removed, methodologies for removal, insight into what will happen with removed materials, and any controls needed for decommissioning methodologies to prevent, minimise, or mitigate environmental effects.

2.2 Programme

2.2.1 The Proposed Development is anticipated to have an operational life of up to 40 years. At the end of this period, the Proposed Development will be decommissioned, and the Site will be reinstated and returned to the respective landowners. The sequencing of decommissioning is likely to follow that of construction but in reverse, and with a post-equipment-removal end stage for restoration (e.g., soils and vegetation) that is akin to the post-construction landscaping as governed by the LEMP. Further details of the decommissioning programme, including phasing and the timing of removal and restoration works will form part of the DMP suite.

2.2.2 The decommissioning phase has been assessed in the ES to last 12 months. This is considered a reasonable worst-case (most intensive) scenario), by virtue of environmental considerations such as (but not limited to) traffic, soil management, surface water management, and noise. However, it is reasonable that the decommissioning phase could

last for longer than 12 months, in the event Site conditions (e.g., waterlogging) restrict progress. A longer decommissioning phase will not reflect an increase in the works to be undertaken but would reduce the intensity of activities on-Site, therefore reducing the likelihood of negative environmental outcomes on considerations such as soil resources and traffic.

2.3 Decommissioning Activities

2.3.1 This part of the FDMP provides a high-level overview of the scope of work that will be subject of the future DMP. This is broken down into three areas which are the removal of above-ground infrastructure, the removal of below-ground infrastructure, and land reinstatement.

2.3.2 The DMP suite will provide a level of detail necessary to show what will be removed, methodologies for removal, insight into what will happen with removed materials, and any controls needed for decommissioning methodologies to prevent, minimise, or mitigate environmental effects.

2.3.3 During decommissioning temporary compounds will be required. Locations of such facilities would be identified in the DMP. Along with compounds temporary access tracks may be required to supplement the existing internal network. Any temporary construction facilities/infrastructure would also be removed as the works wind down and demobilise.

Above-ground Infrastructure

2.3.4 During the decommissioning phase, all above ground infrastructure such as the solar PV modules, mounting structures, PCS Units, above-ground Grid Connection Infrastructure, and other associated structures will be removed and made available for re-use or will be recycled, or otherwise disposed of in accordance with regulations and guidance in force at the time of decommissioning and reflecting good practice and market conditions.

2.3.5 Any request from the landowner to leave certain aspects such as permissive paths, signage, and internal access tracks would be discussed

as part of the decommissioning planning process, with details of retained features included in the DMP.

Below-ground Infrastructure

2.3.6 Below-ground infrastructure includes building foundations and targeted SuDS for buildings (such as gravel sub-bases for ancillary buildings), underground pipework or other elements associated with the Drainage Strategy ('DS') (an outline version of which is included within the Flood Risk Assessment, provided at ES Appendix 2.4), and underground cabling/ducting.

2.3.7 As part of decommissioning all above-ground infrastructure and their below-ground components (e.g. foundations) will be removed as appropriate. The removal of underground cabling should be generally assumed, but with a degree of flexibility depending on any likely disturbance from their removal. It is possible that cables within ducts may be pulled and removed/recycled, but that ducts could be left in-situ to avoid soil disturbances if leaving them would be better for environmental outcomes than full excavation. These matters will be informed by the prevailing best practice and regulations in force at the time and set out in the DMP where applicable.

2.3.8 As per the OSMP (ES Appendix 5.3), excavated soils that cannot be backfilled during construction, particularly topsoil, will be retained on Site wherever possible so they may be used as infill for Site restoration. The majority of excavations during decommissioning will be promptly backfilled, as is the case with similar works during construction. Where removal of equipment requires ground works for which retained soils are insufficient, imported soils will be used where required. An appropriate level of detail regarding the composition of any imported soils and profiles to be achieved will be included within the DMP.

Site Restoration

2.3.9 The DMP will include a Site Restoration Scheme ('SRS') to detail the condition to which the land will be restored. The DMP will include appropriate management plans for how this will be achieved.

2.3.10 Measures within the DMP will show how existing (at the time of decommissioning) vegetation will be protected to avoid loss and include the details of any new planting is required to fulfil the SRS objectives.

2.3.11 Should any construction activities lead to extensive soil removal the soils would be stored in accordance with the SMP. Should any bunds of excavated soils from construction be retained on-Site the DMP will make provision for their restoration to the ground following the removal of the in-ground features that led to their displacement. If any imported soils are required for backfilling detail of the materials and soil profiles to be achieved must also be included in the DMP.

2.3.12 It is recommended that when SMP measures are considered in relation to a final DMP suite, that when Site is cleared of generating station infrastructure and approaching reinstatement to its current use, an appropriate number of topsoil samples (e.g., 15) are collected and tested at a laboratory against BS3882:2015 (or the future equivalent) to determine anomalies in nutrient status that may be relevant to landscape restoration planting measures and agricultural use options.

2.3.13 While the DMP will reinstate the Site to its current use, it will not propose the removal of landscape and biodiversity enhancement measures implemented via the LEMP, and the DMP suite will provide adequate protections for these enhancements as the CEMP does for existing features in construction. Retained features would be handed back to the landowner in the best possible condition to manage as they see fit once the land is no longer under the Applicant's control (after cessation of the decommissioning phase).

2.3.14 While decommissioning of the Site will mean the removal of above and below ground infrastructure associated with the Proposed Development, it

is possible that some works would be appropriate to retain, and allowances should be made for exceptions that align with the principles of sustainable development. This includes but may not be limited to:

- The Proposed Development's permanent access track network (as opposed to any temporary construction/decommissioning routes that could be utilised) will largely follow the existing farm track network. When the Proposed Development is decommissioned the removal of these features will be dependent on any request from the landowner to leave certain infrastructure for the benefit of the resumption of farming activities.
- The Proposed Development's perimeter fencing is stock proof deer fencing which is not atypical in an agricultural environment. It is possible that the landowner would wish for this to be retained because, if removed by the Applicant, it would need to be replaced by the landowner for the return to farming. In such circumstances it would be more appropriate to leave the fencing in place.
- The electricity undertaker could choose to retain aspects of the Grid Connection Infrastructure alongside their other existing infrastructure within the Site if doing so would be of value to the local grid network.

2.3.15 Any elements of the Proposed Development which would be retained in this way will be considered a form of re-use/recycling to prevent unnecessary waste and avoidable new consumption and such features would be identified within the DMP.

3 Environmental Mitigation and Management

3.1 Overview

3.1.1 The DMP will include a suite of documents and plans to provide for holistic environmental management of the decommissioning phase. All plans will be produced to comply with the relevant legislation and best practice guidance at the time of decommissioning and would be informed by the relevant surveys and assessments.

3.1.2 At this time, it is envisaged that the following documents would be required as a minimum:

- Decommissioning Environmental Management Plan ('DEMP');
- Decommissioning Traffic Management Plan ('DTMP');
- Decommissioning Soil Management Plan ('DSMP'); and
- A Site Restoration Scheme ('SRS').

3.1.3 The DMP must reflect the input of all necessary updating surveys and assessments to provide an up-to-date environmental baseline. As a minimum, this will include a Phase 1 Ecological Assessment ('PEA') or its future equivalent, any further associated species survey arising from the PEA (e.g., a badger walkover survey), and an up-to-date Tree Constraints Plan ('TCP') to inform the DEMP and DSMP. Additional surveys relating to traffic volumes and traffic speeds may also be necessary to inform measures within the DTMP.

3.1.4 Provision is made by this FDMP for future engagement with the Council, or other relevant stakeholders over the scope of surveys to be undertaken for the DMP to ensure what is submitted as the DMP is fit for purpose. Further details regarding future engagement can be found in section 5: Future Steps.

Decommissioning Environmental Management Plan (DEMP)

3.1.5 The DEMP will be a document similar to the CEMP prepared for construction. As with the CEMP, depending on the nature of the content to be included these topics could be covered in a single DEMP or could be

extracted into standalone management plans as required. The DEMP would cover topics including those set out below:

- General requirements (working hours, health and safety, training and inductions, good housekeeping, etc.);
- Ecological management (habitats and species);
- Arboriculture management (tree protections);
- Pollution prevention (air pollution, control of dust and dirt);
- Noise and vibration management;
- Water management (flood risk and drainage);
- Materials handling and waste management;
- Ground conditions risk management; and
- Community engagement.

Decommissioning Traffic Management Plan

3.1.6 The impacts of traffic associated with decommissioning will be managed with a DTMP, which will include a strategy equivalent to that which is outlined in the OCTMP (ES Appendix 5.2). The DTMP will provide measures to control traffic and minimise impacts on the local road network.

Decommissioning Soil Management Plan

3.1.7 Before decommissioning, a DSMP will be submitted to the Council for approval. It is anticipated that an outline version of this plan will be agreed with the Council in advance of this. The DSMP will provide measure to manage the handling and placement of soils during decommissioning.

Site Restoration Scheme

3.1.8 The SRS will detail the form and manner of the Site's condition following the decommissioning and removal of generating station infrastructure and the demobilisation of temporary works associated with this phase. It should include, as a minimum, a visual plan for what will be achieved, and a management plan for the implementation of any required measures such as replacement vegetation. It will not specify any requirements for the landowner once the Site is no longer in the Applicant's control but can

provide recommendations for ongoing management of features to be retained to support the Site's environmental interests.

Decommissioning Management Plan Core Topics

3.1.9 The decommissioning phase is anticipated to be similar to the construction phase, but in reverse. The approach to decommissioning management can therefore be expected to generally mirror the approach taken to the management of construction effects, with a comparable document suite as outlined above. What will change between now and the decommissioning to occur in more than 40 years should only reflect the evolution of technology, standards, regulations, and established best practice. Despite these two phases having very different end-outcomes, the principles of good environmental management and methods to achieve these outcomes while minimising negative effects can carry through, and that is what this FDMP is intended to support.

3.1.10 This section of the FDMP includes Table 3.1 in which environmental effects assessed in the ES as being associated with decommissioning are identified along with mitigation and management measures for how they should be considered by the DMP suite to avoid or mitigate potential environmental effects as identified.

3.1.11 While Table 3.1 is intended to be as proportionately comprehensive as possible to inform a document being produced more than 40 years in advance, and based on an application-stage ES, it is recommended that updating assessment of potential effects be undertaken in advance of DMP production. This should be based on knowledge gained in pre-construction, through the implementation of the CEMP and other construction stage management plans, and through the information baseline established via Operational Management Plan ('OMP') and LEMP compliance, with the latter providing for annual environmental monitoring reports. Further detail on recommended and committed future steps for the DMP is provided in section 5.

Table 3.1: Decommissioning Mitigation and Management Measures

Mitigation and Management Measures	Effect
a) General Measures	
The DMP will set out general management and control measures. It will stipulate working hours for decommissioning activities which will be the same as those provided by the CEMP unless otherwise agreed with the Council. It will set out training and induction requirements, provide details of any future quality management schemes equivalent to the current Considerate Contractor Scheme via which the works will be conducted. As well as detail any other overarching best practice and good housekeeping requirements to protect the amenity of surrounding receptors, the Site's natural environment, and for the wellbeing of Site workers.	Effective quality management and good housekeeping will ensure the decommissioning occurs in a manner that is considerate, protects the environment, and has methods in place to monitor compliance and ensure corrective action where required.
b) Temporary Decommissioning Compounds	
Details will be provided of any temporary decommissioning compounds to be utilised on-Site and the phasing of their implementation and demobilisation across the decommissioning phase. Details will include locations, specifications for construction (e.g. the use of permeable aggregate), details of worker parking, welfare areas, waste management and storage areas, and loading/turning areas for larger vehicles. Compounds will be located and constructed with regard for environmental sensitivity and will provide sufficient facilities and space for decommissioning to be managed in a controlled manner. The compounds will be implemented, maintained, and demobilised in accordance with the DMP. Temporary decommissioning compounds will be targeted to the same locations as those provided for the construction phase by Work No. 4, although other locations may be agreed as part of the DMP where appropriate.	Secure and well managed decommissioning compounds will support effective decommissioning Site management and compliance with requirements of the DMP.
c) Site Security	
During the decommissioning phase, the security of the Site will be managed by the appointed contractor(s), who will ensure that works are fully enclosed from trespassers / members of the public. The DMP will include details of any additional and temporary measures, including details of energy supplies for the CCTV and required lighting once the power supply from the generating station (the Proposed Development) has ceased.	To minimise risk of trespassing or theft from Site, to ensure health and safety for works and members of the public, and to maintain effective control Site entry points for overall environmental management compliance control.
d) Lighting	
Temporary lighting may be required for decommissioning. As with construction the use of lighting would need to be set out in a sensitive lighting strategy within the DMP that considers ecological and amenity interests.	To minimise light spill and nuisance.

Mitigation and Management Measures	Effect
e) Pollution Prevention	
Appropriate management measures will be implemented to prevent pollution incidents. Appropriate controls will be in place and cover matters including fuel delivery and fuel storage, provision and control of silt, working near water bodies, and preventing sources of soil and groundwater contamination. Any DMP will fully outline the measures to be adopted to prevent incident risks and for response in the event of a spill and/ or pollution incident.	To minimise risk of environmental harm arising from a pollution incident.
f) Materials Handling	
The DMP will include best practice measures for the safe storage, handling, and management of materials, with due regard to the sensitivity of the local water environment and other sensitive habitats, to prevent risks arising from spillage or release of hazardous materials.	To minimise mishandling of materials resulting in waste or pollution of the surrounding environment and to prevent health and safety risks for workers.
g) Waste Management	
The decommissioning phase be conducted in such a way as to minimise the creation of waste. The appropriate measures to manage waste produced during the decommissioning phase will be provided by the DMP. This will include details of how waste will be handled on Site and methods to ensure proper segregation to enable re-use and recycling where reasonably practicable. Many of the components of a solar farm has current recyclable value, and it is expected that UK facilities to support this will be more mature in 40 years. The DMP to be agreed with the Council and relevant stakeholders will include sustainable decommissioning measures that provide for the removal and recycling and/or disposal of the infrastructure within the Site.	To minimise the unnecessary use of resources and waste production during decommissioning and to prevent unnecessary waste being generated by the infrastructure to be removed.
h) Noise	
During decommissioning, noise levels are anticipated to be less than those of the construction phase because there will be no piling activities. Noise impacts may also potentially be less impactful in the decommissioning phase due to an uptake in the use of electric vehicles. The DMP will include the equivalent best practice measures to those set out in the CEMP, including selecting the quietest viable plant and machinery or working methods. Any decommissioning activities that may be associated with higher than normal/typical activity noise levels would be timed to avoid periods when background noise levels are lower.	To minimise noise from decommissioning activities and vehicles, and to ensure decommissioning is undertaken in accordance with best practice measures for noise management on construction sites at the time.
i) Air Quality	
The DMP will include measures which will control the impact of decommissioning works on air quality, which would align with those that have been outlined in the OCEMP (Appendix 5.1), including future best practice measures equivalent to current	To minimise emissions to air, including dust, from decommissioning activities and vehicles.

Mitigation and Management Measures	Effect
regime provided by the Institute of Air Quality Management (IAQM) guidance. This will include measures relating to dust management and will be agreed with the Council as per the relevant requirements at the time of decommissioning, including dust monitoring and recording complaints.	
j) Ground Conditions	
While ground conditions risks are expected to be significantly reduced at decommissioning compared to construction (due to their avoidance or remediation as part of that phase). The DMP will set out a range of standard best practice measures similar to those within the CEMP covering risk to/from ground conditions and prevent risk of contamination. Appropriate control measures to avoid any impacts on identified peat or minerals resources on the Site. Measures to reduce the risks associated with decommissioning activities in proximity to identified coal mine entries and from contamination from the legacy of coal mining on the Site would be included if they are not avoided or remediated as part of detailed design and construction.	To minimise the risk to worker health and safety from decommissioning activities in areas with ground conditions sensitivities and to protect sensitive areas of the Site from the activities.
k) Biodiversity	
The DMP will include mitigation measures equivalent to those provided by the CEMP to protect ecological for the protection of habitats and species on-Site and for the protection of any locally or nationally designated ecological interests on or off-Site with the potential to be affected by decommissioning works. The DMP will be informed by updating surveys and assessments undertaken by a suitably qualified ecologist at appropriate times to inform the production of the DMP and in accordance with any additional surveys or walkovers specified by the DMP in advance of decommissioning works. An appropriately experienced/licenced ecological clerk of works ('ECoW') (or future equivalent) will be appointed to advise the appointed contactor and provide monitoring and supervision across the decommissioning phase. The DMP will identify ecological constraints, detail regulatory compliance standards, specify protection measures to be employed, specify method statements for types of works or works in certain parts of the Site, will set out requirements for toolbox talks, and make provision for monitoring and reporting.	To minimise the loss of established habitats and the impact on the Site's biodiversity interests.
l) Arboriculture	
The DEMP will be informed by an updated tree survey and Tree Constraints Plan to identify the root protection areas of trees. The DMP will include a Tree Protection Plan (TPP) which provides for tree protection measures including barriers, ground protection, and/or specified working methods in the vicinity of trees, hedges, and other woody vegetation.	To protect retained trees from decommissioning activity effects and to ensure retained trees cannot present a risk to workers on the Site.
m) Transport and Access	

Mitigation and Management Measures	Effect
The DMP will include the equivalent of the CTMP provided for construction. This will be based on consultation with the relevant highway authorities and may include updating traffic count and/or speed surveys to inform the DTMP. Similar measures to those outlined within the OCTMP (Appendix 5.2) will be implemented during decommissioning, subject to changes in technology and construction techniques. This will ensure the flow of traffic is controlled, that access in/out of the Site is safe, that measures are in place to prevent adverse impacts on the road network, and that Site workers benefit from a sustainable travel plan. The DTMP will include details of a signage scheme, a routing to Site plan, control measures for the traffic (volume and size/nature of vehicles, any temporary traffic management required by the relevant stakeholders, and anything else needed to achieve for decommissioning what the CTMP provides for construction (re: environmental effects) based on the standards in place at the time.	To minimise emissions, traffic related noise, and traffic on the local road network during decommissioning and to ensure the safety of Site workers and road users in the vicinity of the Site.
n) Water Management	
Surface water runoff will be controlled and managed to avoid impact on surrounding natural ecosystems resulting in the depletion of groundwater and surface water, nutrient runoff, pollution of aquifers, etc. These impacts can be mitigated with hydrological management tools and techniques. Measures similar to those outlined in the OCEMP will be implemented during decommissioning and all watercourse buffers secured by the CEMP and LEMP will be adhered to as part of the works controlled by the DMP. Where necessary, temporary drainage infrastructure such as infiltration swales, filter drains, and silt fencing will be installed to manage and regulate surface water run-off during the decommissioning phase. Decommissioning activities will be undertaken in accordance with the relevant legislation and methods for preventing water pollution at the time of decommissioning, and it is reasonable to assume that a similar or higher standard will apply at the time of decommissioning. Where necessary, decommissioning activities will be paused during periods of elevated surface water flood risk (or presence of extensive surface water) to minimise the disruption to on-Site overland flows.	To manage on-Site drainage to prevent impacts to water features on-Site and off-Site.
o) Soil Resource Management	
The DMP document suite will include a DSMP (equivalent to the SMP) to protect soil resources during decommissioning (as the SMP will for construction). It will set out up to date best practice measures and reflect Site environment conditions including the management of new (presently unforeseen) risks to soil caused by climate change. The objective of the DSMP will be to identify and safeguard the soil resources (topsoil and subsoil) and to support best practice for the protection of the soil resource during the decommissioning phase.	To avoid, reduce, or offset adverse environmental effects on soil resource, ensuring that the Site is returned to its existing use in its existing condition following cessation of the decommissioning phase.

4 Implementation and Monitoring

4.1 Roles and Responsibilities

4.1.1 The DMP will set out the actions required in respect of implementation of the measures described in this FDMP as well as any additional matters that become established for the decommissioning of utility scale renewable energy infrastructure projects, including the roles and responsibilities of individuals and contractor teams. The DMP will reflect:

- An organogram showing team roles, names, and responsibilities;
- Training requirements for relevant personnel on environmental topics;
- Information regarding on-Site briefings and toolbox talks that will be used to equip relevant staff with the necessary level of knowledge to follow;
- Environmental control procedures;
- Decommissioning phase processes;
- Communication methods; and
- Quality management and compliance procedures.

4.2 Community Liaison

4.2.1 The DMP will set out a community engagement strategy with no less than the commitment to engagement that is provided by the CEMP. This may be in a future DEMP or by some other means, but it must form a part of the DMP suite. This will reflect details of engagement in advance of DMP preparation, which informs the DMP and establishes minimum requirements for ongoing engagement across the decommissioning phase.

4.2.2 As a minimum the community liaison strategy shall include the details of key contacts for the Applicant and their contractor team, and details of methods of communication such as signage, public meetings, and other future best practice options that will be employed. The Applicant will also set out details of a complaints management process so that the decommissioning activities can occur in a considerate and responsive manner.

4.3 Monitoring and Reporting

4.3.1 The DMP suite will detail methods for environmental monitoring of the Proposed Development and its impacts to be undertaken across the decommissioning phase, including regular walkover inspections conducted by the appointed contractors and supported by environmental specialists as appropriate to ensure the measures in the DMP are being implemented. Monitoring requirements will be described in the final DMP.

4.3.2 The DMP shall make provision for a monitoring regime that includes regular Site inspections and records of Site conditions and issues that inform an action log which details any non-conformities or new risks for which corrective actions are required and the results of those actions. The DMP will establish mechanisms for regular contact with the relevant stakeholders and the monitoring and quality management regime will reflect environmental best practice as established at the time.

5 Future Steps

5.1 Overview

5.1.1 This FDMP sets out a framework for the document suite that would be required for the management of environmental effects associated with decommissioning.

5.1.2 The preparation and approval of the DMP is secured via a DCO Requirement and will reflect measures consulted on with other relevant stakeholders prior to decommissioning.

5.1.3 Schedule 2 of the draft DCO [**REF: 3.1**] includes a requirement that unless otherwise agreed with the Council, no later than 6 months prior to the intended date of decommissioning of any part of the Proposed Development, the Applicant must submit a DMP to the Council for approval.

5.1.4 The Proposed Development's decommissioning will be undertaken only in accordance with the DMP suite to be approved. The decommissioning may occur at any point in advance of the end of the Proposed Development's operational life, in which case the DMP would be submitted earlier before this occurs. The DMP may also be submitted in stages based on different aspects the DMP will cover or to cover distinct parts of the Site or the Proposed Development. Based on the generating station having an operational life of up to 40 years, the DMP must be submitted in full no less than 6 months in advance of the end of this 40-year period based on the start of commercial operations following the Proposed Development's commissioning.

5.1.5 Before the end of the operational phase, it is envisaged that the Applicant will, seek to engage with the Council and relevant stakeholders prior to the preparation of the DMP suite. This may include matters such as the community engagement strategy, agreeing the scope of environmental surveys to inform the DMP, agreeing measures to be included within the

DMP in which the relevant stakeholders have an interest, and to obtain any licenses or permits on which decommissioning would rely.

5.1.6 Any DMP submitted must be substantially in accordance with this FDMP and will incorporate topic specific mitigation measures identified as necessary to mitigate any potentially significant adverse effects that may arise during decommissioning.

5.1.7 Any DMP submitted and approved must be implemented as approved.

5.1.8 This FDMP and subsequent detailed DMP demonstrate the Applicant's commitment and approach to the decommissioning of the Proposed Development so as to avoid or minimise environmental effects.