Rosefield Solar Farm

Outline Operational Environmental Management Plan (Clean)

EN010158/APP/7.3.4
Revision 4
Deadline 3
May 2026
Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1. Introduction

1.1. Purpose of this document

1.1.1. This document has been updated at Deadline 3 in response to East Claydon Parish Council's comment around correspondence with agricultural tenants and inclusion of further details on maintenance. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [EN010158/APP/1.2.8]** for the list of current versions of documents.

1.1.2. This Outline Operational Environmental Management Plan (Outline OEMP) has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to sets out the principles and key measures that will be employed during the operation phase to control and minimise the impacts on the environment, including best practice guidelines on waste and water management, in relation to the Development Consent Order (DCO) application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').

1.1.3. Detailed OEMP(s) will be produced for the Proposed Development in accordance with Requirement 12 in the **Draft Development Consent Order (DCO) [EN010158/APP/3.1]** prior to the commencement of the operational phase. The detailed OEMP(s) will be required to be substantially in accordance with this Outline OEMP.

1.1.4. The Proposed Development is likely to become operational (or be commissioned) in phases or parts, and it is envisaged that the detailed OEMP may be prepared, approved and implemented for the individual parts or phases of the Proposed Development. As a result, there could be multiple detailed OEMP(s) prepared in accordance with this Outline OEMP. Each detailed OEMP will be produced in line with this Outline OEMP following grant of the DCO and consulted on and approved by Local Planning Authority in advance of the date of final commissioning for the relevant phase of the Proposed Development.

1.1.5. To ensure that the detailed OEMP(s) remain relevant and effective, updates will be undertaken as necessary, to align with environmental conditions.

1.1.6. This document does not address measures for the construction or decommissioning phases, which are provided in the separate **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2]** and **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4]**, respectively.

The aim of this Outline OEMP is to provide a clear and consistent approach to the control of operational and maintenance activities.

1.1.7. Likely significant effects have been identified through the Environmental Impact Assessment (EIA) process and are reported in the **Environmental Statement (ES) [EN010158/APP/6.1].** A range of best practice mitigation and operational management measures are accounted for in the assessments, which will be implemented during operation of the Proposed Development. This Outline OEMP details how these operational best practice and mitigation measures will be implemented. It also sets out the monitoring activities designed to demonstrate that such mitigation measures are carried out, and that they are effective.

1.1.8. This Outline OEMP is prepared with the objective of ensuring compliance with the relevant environmental legislation and mitigation measures set out within the ES. Any additional licenses, permits or approvals that are required for the operation phase of the Proposed Development and that are not disapplied by the DCO, will be set out in the detailed OEMP, including any environmental information submitted in respect of them. The overarching list of other consents and licences is set out in the **Schedule of Other Consents and Licences [EN010158/APP/5.5].**

1.1.9. This document provides the likely structure of the detailed OEMP and relevant preliminary information. It also indicates what additional information or controls might be included under each sub-section within each detailed OEMP.

1.1.10. The Applicant will be responsible for ensuring any works are undertaken in accordance with the environmental controls documented in any approved detailed OEMP(s), which must be prepared and implemented in substantial accordance with this Outline OEMP.

1.1.11. This Outline OEMP is set out in the context of the other environmental management plans that are submitted with the DCO application in **Figure 1** below.

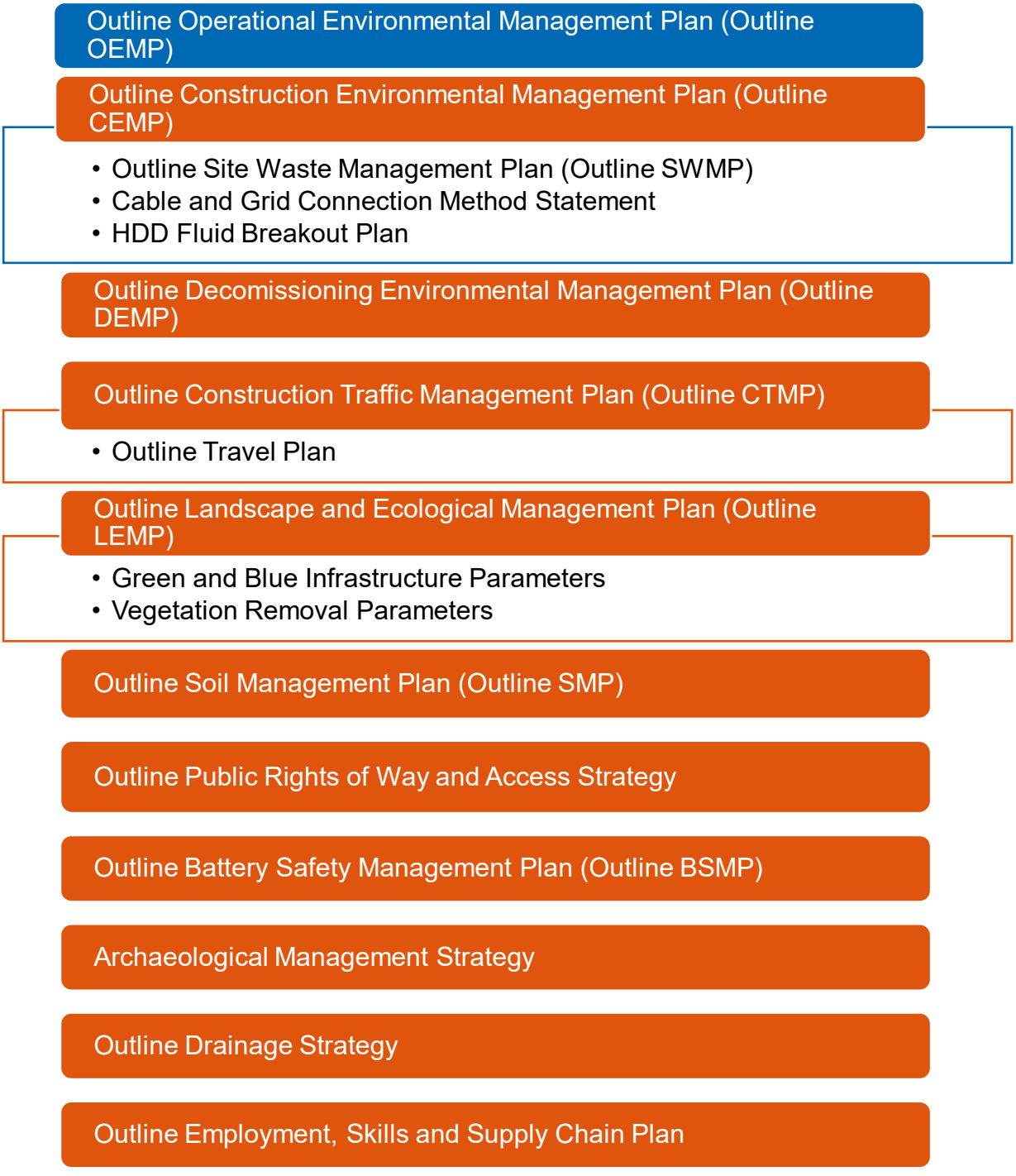

Figure 1: Outline Management Plans

1.1.12. The following additional environmental management plans are secured by this Outline OEMP and will be prepared as part of the OEMP prior to operation of the Proposed Development:

- Site Waste Management Plan;

- Emergency Preparedness and Response Plan (including Flood Risk); and
- Health and Safety Plan (including Flood Risk and Climate Change).

1.2. The Proposed Development

1.2.1. The Proposed Development comprises the construction, operation (including maintenance) and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and Grid Connection Cabling Corridor to the National Grid East Claydon Substation.

1.2.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').

1.2.3. The location of the Proposed Development is shown on **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3]**. The Proposed Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3]** within which the Proposed Development can be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. Land within the Order Limits is known as the 'Site'.

1.3. The Order Limits

1.3.1. The extent of the Order Limits are shown in **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]** and the Proposed Development is described in full in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and shown spatially on the **Works Plans [EN010158/APP/2.3].**

2. Operational Environmental Management

2.1. Introduction

2.1.1. This section sets out the general site arrangement for the operational phase of the Proposed Development.

2.2. Roles and Responsibilities

2.2.1. The Applicant and all appointed contractors will be responsible for ensuring that the potential risks to the environmental are adequately avoided or controlled by the application of measures documented within the OEMP, which shall be complied with throughout operation. Key roles and responsibilities during the operation phase in the management of environmental impacts will likely include, but are not limited to:

- **Site Manager** – Overall responsibility for activity onsite.
- **Environmental Manager** – Responsible for the overall management of environmental aspects onsite, ensuring environmental legislation and best practices are complied with, and environmental mitigation and monitoring measures identified are implemented. The Environmental Manager will oversee environmental monitoring onsite and carry out regular environmental site inspections, reporting and responding to any incidents of non-compliance. The Environmental Manager will liaise with the local planning authority, relevant environmental bodies and other third parties as appropriate.
- **Health and Safety Manager**– Responsible for monitoring and controlling of health and safety compliance and related rule and regulations onsite.
- **Community Liaison Officer** – A Community Liaison Officer will be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.

2.2.2. These roles and responsibilities are indicative and will be confirmed in the OEMP(s).

Table 1: Project roles and environmental responsibilities

Process Task	Role[1]			
	Site Manager	Environmental Manager	Health and Safety Manager	Community Liaison Officer
Developing and maintaining the OEMP	A	R	C	I
Monitor environmental aspects through review of operation method statement, identify and control issues	A	R	R	I
Monitoring operations to ensure any necessary environmental issues and control measures are in place; ensuring they are effectively communicated, appropriate and implemented on site.	A	R	C	I

[1] **RACIM DETAILS** –

R – Responsible: The individual(s) who perform an activity responsible for action/implementation – although usually only one, R's can be shared.

A – Accountable: The individual who is ultimately accountable including yes/no decision and power of veto – only one (A) can be assigned.

C – Consulted: The individual(s) to be consulted prior to a final decision being made or action taken – two-way communication.

I – Informed: The individual(s) who need to be informed after a decision is made or action is taken – one-way communication.

M – Monitor: Monitor the delivery of the proposed development on behalf of third parties and report on compliance.

Process Task	Role[1]			
	Site Manager	Environmental Manager	Health and Safety Manager	Community Liaison Officer
Ensuring the work is performed by trained and qualified staff, and providing training where necessary.	A	R	C	-
Ensuring the adequate resources are allocated for environmental management.	R	M	I	-
Ensuring that all relevant environmental documentation and information (including permission, consents, permits and assessments) is communicated	R	M	C	I
Regular site inspections and maintaining a record of environmental performance, and reporting performance and monitoring environmental performance.	C	R	I	I
Following good practice and minimising impact on the environment	A	R	C	-
Understanding project environmental obligations and mitigation measures	A	R	C	I

Process Task	Role[1]			
	Site Manager	Environmental Manager	Health and Safety Manager	Community Liaison Officer
Liaison with local authority, other statutory bodies, members of the public, press and the media	A	R	I	C
Supporting all site staff with environmental management including reviewing and commenting on method statements and risk assessments	R	M	R	-
Ensuring that the environmental policy of the Applicant is delivered	A	R	M	-
Providing information on waste management/reduction procedures to relevant staff	A	R	MR	-

2.3. Operational Programme

2.3.1. The operational life of the Proposed Development is 40 years, which is to be controlled by Requirement 18 in the **Draft DCO [EN010158/APP/3.1].**

2.4. Operational Activities

2.4.1. The Proposed Development is described in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and Schedule 1 of the **Draft DCO [EN010158/APP/3.1]**, where the "authorised development" is divided into work packages. The work numbers for those packages are identified below:

- Work No. 1: Ground Mounted Solar PV Generating Station
- Work No. 2: Rosefield Substation Compound
  - Work No. 2A: Rosefield Substation Compound
  - Work No. 2B: Abnormal Indivisible Load Corridor
- Work No. 3: Satellite Collector Compounds
- Work No. 3A: Satellite Collector Compounds
- Work No. 3B: Satellite Collector Compound Transformer
- Work No. 4: Battery Energy Storage System Compound
- Work No. 5: Main Collector Compound
- Work No. 6: Grid Connection Cabling Corridor
- Work No. 7: Interconnecting Cabling Corridor(s)
- Work No. 8: Temporary Construction and Decommissioning Compounds
  - Work No. 8A: Primary Construction Compounds; and
  - Work No. 8B: Secondary Construction Compounds
- Work No. 9: Highways Works (Facilitate access)
- Work No. 10: Green and Blue Infrastructure

2.4.2. During the operational (including maintenance) phase of the Proposed Development, onsite activities would include routine servicing, maintenance, and replacement equipment as and when required, as well as solar panel cleaning and vegetation management.

2.4.3. It is anticipated that up to 24 permanent staff would typically be onsite during the operational (including maintenance) phase, with additional staff attending when required for maintenance, replacement of solar equipment, vegetation management and cleaning.

2.4.4. The land underneath and around the Solar PV modules will be managed through a combination of grazing and/or hay/silage production to maintain the field vegetation during the operational phase of the Proposed Development. The management of the Green and Blue Infrastructure and Mitigation and Enhancement Areas will be undertaken in accordance with the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6].**

2.4.5. During the operational (including maintenance) phase, the Abnormal Indivisible Loads (AIL) access located in the north of Parcel 3, would only be used should unforeseen events occur which result in the Rosefield Substation requiring replacement. The AIL access would not be used during flood events.

2.5. Working Hours

2.5.1. The Site will generally be managed by up to 24 permanent staff per day during normal working hours (7 am to 7 pm) Monday to Friday, with additional staff attending when required for maintenance, replacement of equipment, vegetation management and cleaning. The Rosefield Substation will be unmanned during normal operation.

2.6. Site Security

2.6.1. The Proposed Development will receive several security risk management threat assessments during its development, construction, operation and decommissioning phases. These will be conducted at minimum yearly but also as needed to respond to any newly identified threat to the safe and secure operation of the site. These security risk management threat assessments will be conducted by a suitably qualified and experienced person and will determine security risks and ensure these are appropriately managed. Security measures for the Proposed Development will be amended accordingly depending on the outcome of the security risk management threat assessments.

2.6.2. Fencing would enclose the Solar PV modules located within the area of **Work No. 1**. The fields containing the Solar PV modules and supporting infrastructure would likely be fenced using ‘deer-proof fencing’ (as shown indicatively in Section 3.14 of the **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**.), which is formed of wooden and/or metal posts and wire mesh, up to 2.5m in height above ground level (AGL). Pole-mounted internal-facing closed-circuit television (CCTV) systems would be installed at a height of up to 5m. Access gates would be metal and be of a similar height to the perimeter fencing. Clearances above ground, or mammal gates, would be included to permit the passage of wildlife.

2.6.3. Fencing and CCTV would also be installed around the perimeters of Work Nos. 2 - 5 and the Jointing Bay elements of Work No. 6. The fencing of these works would either be palisade security fencing or monitored pulse and wire mesh fencing. Palisade security fencing would be up to 2.75m in height (AGL) and comprise steel rails attached to horizontal-running rails, connected to vertical steel joints.

2.6.4. Monitored pulse and wire mesh fencing would comprise a mesh fence up to 2.75m in height (AGL) with a pulse monitoring security fence up to 3.4m height (AGL) inside the mesh fence.

2.6.5. Further details of Site security measures will be provided in the detailed OEMP(s).

2.7. Control of Light

2.7.1. During operation (including maintenance), no part of the Proposed Development would be continuously lit; manually operated and motion detection lighting would be utilised for operational and security purposes. This Outline OEMP controls lighting during the operation phase to ensure effects are reduced.

2.7.2. The lighting of the Rosefield Substation, BESS and Satellite Collector Compounds would be in accordance with health and safety requirements, particularly around any emergency exits where there would be lighting, similar to street lighting that operates from dusk. Otherwise, the use of motion detection security lighting to avoid permanent lighting will be used around the Rosefield Substation, BESS and Satellite Collector Compounds for security purposes, and a sensitive lighting scheme will be developed to ensure inward and downward distribution of light, avoiding light spill onto existing boundary features including residential receptors.

2.7.3. Lighting will conform to best practice guidelines with respect to minimising light spill into adjacent ecologically sensitive habitats and minimise disturbance to bats and other species, including livestock, during operation.

2.7.4. Further details of the lighting scheme will be provided in the detailed OEMP(s).

2.8. Control of Noise

2.8.1. It is anticipated that the noise emitting equipment will be refined as part of the detailed design. This design development may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits, which will be in accordance with the parameters secured within the **Work Plans [EN010158/APP/2.3]** and **Design Commitments [EN010158/APP/5.9]**.

2.8.2. Prospective design solutions, including final plant locations and selections, will not be progressed if the associated noise levels post-mitigation result in any significant adverse effects i.e. no greater than the adopted criteria of 40 dB L_{Ar} daytime and 35 dB L_{Ar} night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1]**.

2.8.3. In the case of the main transformers being a major component of the acoustic emissions from the Proposed Development, it is proposed that a minimum 5 dB(A) reduction is obtained at source through refinement of the engineering requirements in order to adopt lower noise emitting transformers.

2.8.4. The following noise barriers will be implemented during the operational phase to minimise noise emissions:

- 3.5m high barrier around the BESS container areas;
- 5m high barrier around sections of the boundary of the Rosefield Substation;
- 3.5m high absorptive barriers around Central Inverters that are impacting upon noise-sensitive receptors; and
- Introduction of enclosures and/or barriers around the main transformers within the Rosefield Substation and Satellite Collector Compound

2.8.5. Barriers should be constructed using a suitably dense material, with no holes or gaps around or underneath.

2.8.6. Further mitigation related to the control of noise is detailed in **Section 3** of this Outline OEMP.

2.8.7. Noise measurements of the installed operational equipment will be undertaken to verify that noise levels at source align with values used within the noise prediction model prepared at the detailed design stage. For the site-wide inverters, this would be based on a representative sample of units. The noise monitoring process would be undertaken on a cyclic basis at an interval agreed with the Environmental Health department at Buckinghamshire Council. The resultant dataset would be used to verify that the noise emissions have not increased over time, at a magnitude that could result in significant adverse effects.

2.8.8. If the noise monitoring demonstrates that the source levels are higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed to ensure that the resultant noise levels do not exceed the adopted criteria of 40 dB L_{Ar} daytime and 35 dB L_{Ar} night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the **Draft DCO [EN010158/APP/3.1.3]**.

2.8.9. In the event of a noise related complaint being received during the operational phase, the following procedure would typically be adopted:

- Community Liaison Officer to log noise complaint and advise complainant on the steps that will be taken. During this period, further details of the noise complaint will be established, including, but not limited to, the characteristics of the noise source and when it occurs.
- Community Liaison Officer to notify the Environmental Health department at Buckinghamshire Council regarding the complaint that has been received.
- Representative of Rosefield Solar Farm will carry out an inspection of noise emitting equipment associated with the development in the locality of the complainant property, to establish that it is operating as intended, and that the installed mitigation measures are in place and working effectively.
- In the event that defects (or other issues) are encountered to either the noise emitting equipment or any associated mitigation measures during the Site inspection, this would trigger the requirement for appropriate remedial actions to be taken. Upon completion of the remedial works, additional noise measurements of the affected unit(s) would be taken to verify noise levels at source align with values used within the noise prediction model.
- If the noise monitoring undertaken (post-remedial works) demonstrates that the source levels are higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed. This will ensure that the resultant noise levels do not exceed the adopted criteria of 40 dB L_{Ar} daytime and 35 dB L_{Ar} night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the **Draft DCO [EN010158/APP/3.1.3]**.
- Where no noise defects are encountered during the Site inspection, the requirement for additional noise monitoring would be discussed and agreed with the Environmental Health department at Buckinghamshire Council. As part of this, consideration would be given to the on-going noise monitoring that has been undertaken (refer to paragraphs 2.8.7 and 2.8.7).
- Details of the noise complaint and the remedial actions that have been taken would be recorded in a complaint investigation document that would be provided to the Environmental Health department at Buckinghamshire Council and also the complainant, as appropriate.
- The complainant will be kept informed of the steps being taken as part of the complaint investigation, via the Community Liaison Officer.

2.9. Operational Traffic Management and Access

2.9.1. It is anticipated that up to 24 permanent staff per day would be on Site during the operational (including maintenance) phase, with additional staff attending when required for maintenance, replacement of faulty or end of service life solar equipment, vegetation management activities and cleaning.

2.9.2. In the event of the need to replace any of the Proposed Development's operational equipment, there may be a level of HGV activity required to complete these works within the Order Limits. The extent of traffic generation, however, would be significantly less than that assessed for the peak of construction activities.

2.9.3. The land underneath and around the Solar PV modules along with the Green and Blue Infrastructure and Mitigation and Enhancement areas would be managed in accordance with the **Outline LEMP [EN010158/APP/7.6]**.

2.9.4. No new internal access tracks would be constructed for the operation (including maintenance) phase of the Proposed Development. The construction phase internal access tracks would remain into the operational (including maintenance) phase of the Proposed Development.

2.9.5. The access points that will be used for operation are illustrated in **ES Volume 3, Figure 3.11: Indicative Location of Internal Access Tracks [EN010158/APP/6.3]** and **ES Volume 3, Figure 3.14: Indicative Watercourse and Ditch Crossing Locations [EN010158/APP/6.3]**.

2.9.6. There is no proposed access route across Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**) between Parcel 2 and Parcel 3 during the operational (including maintenance) phase of the Proposed Development. Any access will be limited to ad hoc, infrequent access for any necessary cabling maintenance works.

2.9.7. The internal access track between Parcels 1 and 2, adjacent to the cable route, will be available for use by tenants for agricultural activities.

2.10. Parking Provisions

2.10.1. During operation, parking for vehicles will be available for use by workers adjacent to the collector compound.

2.10.2. Further details on parking provisions will be confirmed by the Applicant and provided in the OEMP(s).

2.11. Replacement Schedule

2.11.1. During the operational phase of the Proposed Development, various components will likely require replacement as detailed in Table 3.20 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. As components approach towards the end of their design life, there will be an evaluation to determine if the components require maintenance and/or replacement. It is not anticipated that wholescale maintenance or replacement would be required during the operational phase of the Proposed Development.

2.11.2. The Applicant will submit a planned maintenance schedule every 12 months from the date of final commissioning to the relevant local planning authority.

2.11.3. Towards the end of the operational phase, if the decommissioning works is anticipated to begin within the 12 month planned maintenance schedule, the schedule will incorporate the anticipated activities and amount of waste that would be recycled / landfilled during the start of the decommissioning phase.

2.11.4. The planned maintenance schedule will exclude unforeseen emergencies that may require maintenance throughout the year. This would include any maintenance activities that need to be undertaken urgently due to health, safety or environmental responses in response to an event or circumstance which happens unexpectantly.

2.11.5. The Applicant will inform the relevant local planning authority when a component is no longer operational and requires decommissioning.

2.11.6. As part of the maintenance schedule, the Applicant will confirm any associated vegetation removal requirements.

2.11.7. The annual planned maintenance schedule must include the following details as a minimum:

- Extent and nature of the schedule maintenance (including anticipated amount of waste that would be recycled / landfilled);
- Details of any trees that require removal and if they are proposed to be replaced;
- Details of transport requirements;
- The proposed timing of such maintenance;
- Confirmation that the environmental effects that are likely to arise as a result of such maintenance and the environmental controls to be implemented are not materially worse than those reported in the ES.

2.11.8. The Applicant will further notify the relevant local planning authority of any maintenance that has been undertaken as a result of any unforeseen emergencies. The notification shall be given as soon as practically possible but no later than 14 days from the emergency maintenance being carried out. The notification shall include details of the extent and nature of the maintenance (including anticipated amount of waste anticipated that would be recycled / landfilled).

2.11.9. Excluding unforeseen emergencies and unless otherwise agreed with the relevant planning authorities, the Applicant will not undertake maintenance activities outside of the planned maintenance schedule.

2.12. Operational Waste Management

2.12.1. Any equipment that needs to be replaced during the operational period will be disposed of following the waste hierarchy, with materials being reused or recycled wherever possible.

2.12.2. The Proposed Development is anticipated to generate Waste Electrical and Electronic Equipment (WEEE) during the operation (including maintenance) phase. As such, these will be recovered and recycled by an authorised reprocessor as required by the WEEE Regulations 2013 **[Ref. 1]**. To ensure that this is done to "Best Available Treatment Recovery and Recycling Techniques", a list of up-to-date authorised reprocessors should be established prior to the operational phase of the Proposed Development, and kept up to-date throughout the operation phase of the Proposed Development.

2.12.3. Electrical waste will be disposed of per the Waste from Electrical and Electronic Equipment (WEEE) Regulations, minimising the environmental impact of replacing any elements of the Proposed Development.

2.12.4. Solar PV modules are covered under WEEE Regulations, with 99% of its components able to be recycled. The Solar PV modules will be removed, stacked and covered, on hard-standing ground over 10m away from a watercourse on-site then sent to be recycled. Removal, stacking and storage of panels before leaving site will be undertaken in such a way that ensures no risk to controlled waters.

2.12.5. Prior to the operation (including maintenance) phase commencing, a Site Waste Management Plan (SWMP) will be prepared by the Applicant, which will provide waste estimates, and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will use, as a starting point, the measures detailed within the **Outline Site Waste Management Plan** which forms **Appendix 1** of the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** updated to reflect the circumstances prevailing

during the period in which operational and maintenance activities are to be carried out.

2.12.6. All waste to be removed from the Order Limits will be undertaken by fully licensed waste carriers and taken to licensed waste facilities for recycling or disposal and managed in line with the requirements applicable at the time. The waste hierarchy will be applied, in priority order: prevention, preparation for reuse, recycled, other recovery and disposal.

2.13. Environmental Incidents and Emergencies

2.13.1. The following additional plans are secured by this Outline OEMP and will be prepared as part of the detailed OEMP(s) prior to the operation of the Proposed Development:

- Emergency Preparedness and Response Plan (including Flood Risk); and
- Health and Safety Plan (including Flood Risk and Climate Change).

2.13.2. The Emergency Preparedness and Response Plan will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environmental Agency in relation to responding to flood warnings and events. The plan will also detail the procedures for responding to incidents (such as spills, leaks or generation of silt laden runoff as to prevent pollution) and emergencies (such as flooding) on site, and any reporting. This will also include the arrangements for all incidents, including environment incidents, and will include the procedures for the immediate response, reporting, stakeholder communications, and incident investigation.

2.13.3. An **Outline Battery Safety Management Plan (BSMP) [EN010158/APP/7.9]** and **Outline Drainage Strategy [EN010158/APP/7.11.2]** sets out the key fire safety provisions for the Battery Energy Storage System (BESS) proposed to be installed at the Proposed Development including fire protection measures and mitigation to reduce fire risk and contamination associated with firewater. A Requirement in the **Draft DCO [EN010158/APP/3.1]** secures the submission of a detailed Battery Safety Management Plan prior to construction of the BESS. The detailed Battery Safety Management Plan will address aspects such as safe design, construction, operation, and disposal and the strategy for firefighting and emergency planning.

2.13.4. In the event that a battery becomes damaged or requires replacement, the operator will develop a post-incident recovery plan that addresses the potential for reignition of the BESS and de-energizing the system, as well as removal and disposal of damaged equipment. Further detail will be set

out at a later stage in the Emergency Response Plan located in the **Outline BSMP [EN010158/APP/7.9.3]**.

2.14. Management of Landscaping, Vegetation Planting and Biodiversity

2.14.1. An **Outline LEMP [EN010158/APP/7.6]** has been prepared and submitted as part of the Application. The **Outline LEMP [EN010158/APP/7.6]** provides a framework for delivering the landscape strategy and the successful establishment of future management of proposed landscape works associated with the Proposed Development. It sets out the short and long-term measures and practices that will be implemented to establish, monitor and manage landscape and ecology mitigation and enhancement measures embedded in the design.

2.14.2. The **Outline LEMP [EN010158/APP/7.6]** sets out the measures proposed:

- To mitigate the effects of the Proposed Development on landscape, biodiversity, and heritage features;
- To enhance the biodiversity, landscape, and green infrastructure value of the Order Limits; and
- To secure compliance with relevant national and local planning policies.

2.14.3. Detailed Landscape and Ecology Management Plan(s) (LEMPs) will be prepared in substantial accordance with the **Outline LEMP [EN010158/APP/7.6]** and will be required to be submitted to and approved by the relevant local planning authority. This will include provisions in respect of ongoing maintenance, management and monitoring of the landscape, vegetation, habitats and species during the operational phase of the Proposed Development.

2.15. Community Liaison and External Communications

2.15.1. While the Community Liaison Group (CLG) would not be in place during operation, updates would be given to the local community and stakeholders at key milestones to maintain an on-going relationship over the entire lifetime of the project. There would also be contact details onsite and online for members of the community and stakeholders who can contact the Community Liaison Officer.

2.15.2. The Applicant will liaise with all agricultural tenants and Preston Farms Ltd and TCS Biosciences Ltd (together, the Prestons') during the preparation of the detailed Operational Environmental Management Plan and subsequently during the operational phase. Measures to be included in the detailed Operational Environmental Management Plan will include:

- providing at least six months advance notification of the location and timing of any maintenance activities in proximity to the agricultural tenants' and the Prestons' grazing land;

- appropriate biosecurity measures reflective of the agricultural tenants' and the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and
- provision of toolbox talks to relevant site staff about the sensitive nature of the agricultural tenants' and the Prestons' specialist operations, and the processes around the measures above.

3. Operational Environmental Management and Mitigation Plan

3.1. Topic Specific Mitigation

3.1.1. This section of the Outline OEMP sets out the mitigation and management measures to be included as a minimum in the OEMP using information presented in the **Environmental Statement [EN010158/APP/6.1-6.4].** It also identifies where monitoring is proposed to assess the effectiveness of the mitigation measures.

Table 3.1: Air Quality

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Road traffic exhaust emissions during operation (including maintenance)	Display the name and contact details of people accountable for air quality and dust issues with respect to the Proposed Development at the Main Construction Compound. This may be the Environment Manager or the Site Manager. Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. **Operating vehicle/machinery and sustainable travel** Ensure all vehicles switch off engines when stationary - no idling vehicles.	N/A	The Applicant Responsibilities will be confirmed within the OEMP.

Table 3.2: Biodiversity

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Habitat loss or gain **Fragmentation of population or habitats** **Habitat degradation** **Species mortality**	Appropriate management and monitoring of mitigation habitats would be required for a period of 30 years (as required by the Environment Act 2021 **[Ref. 2]**) to ensure successful establishment and condition. Control measures to mitigate and manage operational related effects on habitats to prevent pollution events occurring. The appropriate habitat management regimes to maintain habitat suitable to support: • black hairstreak and brown hairstreak butterfly; • open ground nesting habitat and increased foraging potentials; and • terrestrial invertebrates (excluding black hairstreak and brown hairstreak butterfly). **Black hairstreak and brown hairstreak butterfly** Management of woodland, hedgerows and scrub habitat that contain Blackthorn would be undertaken in such a manner to ensure maintenance works do not damage or	N/A	The Applicant Responsibilities will be confirmed within the OEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	destroy Blackthorn that could support black or brown hairstreak eggs.		
	Ground nesting birds, non-ground nesting birds and wintering birds Control measures for vegetation clearance, which would avoid the main nesting bird period (March to August inclusive) where possible. Any vegetation clearance proposed within the nesting bird period (March to August inclusive) would be checked for the presence of any nests by a suitably experienced ecologist within 48 hours prior to vegetation removal or ground clearance. If active nests are found, appropriate buffer zones will be put in place and the area monitored until the young birds have fledged. The appropriate habitat management regimes to maintain open ground nesting habitat and increased foraging potentials	Monitoring of ground nesting birds would be undertaken during the operation (including maintenance) phase to measure the effectiveness of the embedded mitigation and the effect of Solar PV modules on ground nesting birds.	
Change in normal conditions (light, noise, vibration, human activity) impacting flora and fauna	**Barn owl, red kite, hobby, peregrine falcon and birds** Measures to mitigate and manage operational related effects on habitats and to prevent disturbance, including measures to prevent air, water and light pollution.	Monitoring of bat activity would be undertaken during the operation (including maintenance) phase to measure the effectiveness of the embedded mitigation	
	During operation (including maintenance), no part of the Proposed Development would be continuously lit.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	Manually operated and motion detection lighting would be used only for operational and security purposes. Lighting would be used only at entrances or gates, or within compounds, and would only be operated when required for safe working or security. The use of PID systems security lighting, required around key electrical infrastructure, avoids the need for permanent lighting. The inward/downward direction design of lighting would avoid light spill on to adjacent hedgerows, woodlands, field margins and watercourses, ponds and wet ditches likely to be used by bats, badgers or otter.	and the effect of Solar PV modules on bats.	
Potential impacts on trees	Measures to mitigate and manage operational related effects on trees.	A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be	

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
		undertaken following severe weather events or where concerns are identified.	

Table 3.3: Climate

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Failure of assets due to changes in climate	The condition and integrity of assets would be regularly assessed, and maintenance undertaken as early as required, giving consideration to materials with enhanced tolerance to fluctuating temperatures and exposure to rainfall.	N/A	The Applicant The Principal Contractor Responsibilities will be confirmed within the OEMP(s).
Release of greenhouse gas (GHG) emissions during operation	Implementing measures to decrease fuel use by maximising energy efficiencies in vehicles and plant, for example to ensure all vehicles switch off engines when stationary and ensure vehicles are well maintained and conform to current emissions standards; Promoting the use of sustainable fuels in vehicles, and where possible making use of electric vehicles to reduce fuel consumption; Using locally sourced and/or produced materials. The use of recycled aggregates, where appropriate, for		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	foundations, subbases, hard-standings and pavement materials; and Actions to meet the waste hierarchy in accordance with the principles of the Government's Resources and waste strategy for England 2018 **[Ref. 3]**. Promoting the recycling of materials by segregating construction waste to be re-used and recycled where practical.		
Risk from flooding	A Flood Management Plan will be produced for any areas of the Proposed Development (mainly Internal Access tracks and Solar PV panels) that intersect areas of flood risk.		

Table 3.4: Cultural heritage

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Damage to sensitive archaeological remains.	No intrusive groundworks in areas of known high archaeological value.	N/A	Principal Contractor
Unnecessary disturbance of below ground archaeological remains.	Care to be taken when removing piles if needed for maintenance.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Increased traffic flows on the contribution of setting to the significance of heritage assets.	Abnormal indivisible loads for maintenance (if required) to be routed away from Botolph Claydon.		
Accidental damage to sensitive archaeological remains and heritage assets	Protection measures for any archaeological remains preserved in situ through the detailed design and heritage assets will be added to the detailed Operational Environmental Management Plan(s) including detail on the location and vulnerability of these assets. Mitigation measures within the final Archaeological Management Strategy will be agreed with Buckinghamshire Council in consultation with Historic England and will be included in the detailed Operational Environmental Management Plan.		The Applicant

Table 3.5: Land and groundwater

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Damage to human health and the environment due to contamination	• Managing any remaining risks (if present) from former agricultural activities such as foot and mouth burial pits, waste pits, pesticides and asbestos containing material, ensuring that land and groundwater receptors are protected from	N/A	The Applicant Responsibilities will be confirmed

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Contamination of soil/groundwater/surface water related to potential spills from operational plant through operation or refuelling activities, and spillages and leaks of fuels, oils and chemicals. **Existing groundwater levels and flow directions**	effects of contamination associated with historical usage of the land. Measures include: • Good housekeeping and site maintenance, including management of materials and waste; • Maintain records relating to routine inspections, investigations, corrective actions and action schedules; and • Emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the land and groundwater during the operation (including maintenance) phase. Before any operational activities occur near the identified wells, the results of the further investigation as to the status of these wells, and subsequent mitigation (if required), will be incorporated into the detailed Operational Environmental Management Plan. The Environment Agency assign a default 50m radius groundwater Source Protection Zone 1 to any point where groundwater is abstracted for domestic supply or for food production purposes. Procedures to mitigate against erosion, prevent disturbance of contamination, and emergency procedures to manage accidental spillages and leaks		within the OEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	in order to minimise any risk to the soil and groundwater shall include the following: *Water Pollution* • Surface water and drains must be protected from silt run-off: use drain guards to protect drains. Use straw bales, gravel traps or silt fencing to protect surface waters. All silt protection measures must be inspected frequently and maintained throughout the works. • Tracking or washing out next to drains/surface waters must be avoided. • Contaminated water must be treated or discharged offsite. • Road sweepers shall be utilised where necessary. • Silty water and associated run-off to surface water and drains must be avoided: minimise any areas of soil stripping and stockpiling, control water volumes used to supress dust, batter/sheet stockpiles where required. • The transformers will be bunded and placed on an impermeable base and will have separate oil interceptors and an emergency shut off system to prevent fire risk and the contamination of firewater		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	and surface water runoff. All bunds will have 110% capacity of oil in the transformers as per the relevant requirements. *Fuel storage* • Fuel levels shall be monitored and recorded regularly (sudden changes may be a sign of leaks). • Fuel tanks, secondary containers and storage compounds shall be inspected regularly for damage, corrosion, leaks, faults and vandalism. Repair defects/faults immediately and retain records. • The secondary containment system must provide storage for at least 110% of the tank's maximum capacity and ensure that any valves, filters, sight gauges, vent pipes or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges would be contained. • Fully lockable and labelled 'Fuel Safe Static Tank' will be deployed. • Sufficient spill kits will be provided. Spill kit supply to be monitored regularly to ensure adequate stock remains full.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Spill kits will be available within each plant onsite and located close to identified pollution sources or sensitive receptors (fuel storage areas, water course crossings, etc.). • All drains located adjacent or near to refuelling points shall be covered by a drain guard before commencing transfer. All fuel transfers to be supervised. • Drums must be stored in a secure interceptor drum store within the designated refuelling area. • Oil spill and oil impacted water must be collected in a fuel safe container with fuel tags. Fuel spills must be contained using the spill kits provided, spills should be reported to the Site Manager immediately. • Records must be maintained of all environmental incidents, mitigation works, clean up method and validation. • A suitable container for hazardous wastes must be provided within the waste compound. *Refuelling*		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Where possible, refuelling should only be carried out in a designated area, which will be secured/locked out of hours. • The refuelling area shall be located away from drains and watercourses (>10m from a watercourse and >50 meters from a spring, well or borehole) and should not be undertaken near any standing water (such as puddles etc.). • Areas of permanent waste oil/fuel/chemical storage will be located 50m away from watercourses or drainage paths. Where this is not possible, advice will be sought from the Environmental Manager and a minimum distance will be agreed with the Applicant. • Refuelling will always be supervised by a competent supervisor. • Drip trays or equivalent should be used for all refuelling plant. • Mobile plant must be refuelled away from surface waters, drains, permeable pavements and open excavations. A fuel drip tray must be used.		

Use and storage of hazardous materials/substances

- The Principal Contractor is responsible for carrying out a risk assessment of each substance and ensuring that all appropriate storage, protective equipment and if necessary, emergency procedures are put in place onsite.
- All hazardous materials shall be labelled, sealed and stored with their COSHH assessment in a bunded and lockable container away from drains and watercourses when not in use.
- COSHH datasheet will be read and understood before using any hazardous materials.
- Any spent (contaminated) spill kits, absorbent granules, sheets or fibres must be disposed of in accordance with COSHH regulations and Site Waste Management Plan requirements.
- Hazardous liquids shall be transferred using a funnel and drip tray and sealed and returned to the container immediately after use. Damaged containers shall be reported to the Site Manager.
    - All usages of hazardous liquids shall comply with its requirements for safe handling and storage.
    - Hazardous liquids must be re-sealed after use. Empty containers are to be disposed of to the

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	designated container within the waste compound. Workers are required to wear PPE such as gloves and face masks (where appropriate) to prevent dermal contact and inhalation or ingestion. *Site set up and groundwork* • Local Authority consent must be obtained for particularly noisy activities before starting works. For example, crushing and piling. The Applicant and operatives must be informed of consent conditions. • Minimise the use of builders skips and inspect lifting and locking points, doors and door locks and general condition weekly as minimum. • Ordered materials shall be adequately managed to avoid spoilage or overordering and surplus materials shall be minimised: provide a suitable and sufficiently sized materials storage compound that is lockable and provides an above-ground covered area, protected from wind and rain. Encourage the reuse of cut-offs and arrange for suppliers to take back unused surplus materials and packaging.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Storage compounds will be located away from any identified water features. • Surplus materials are to be reused on site where possible. All reuse and recycling to be carried out in accordance with the terms of a valid waste exemption or voluntary codes of practice/protocols. • Excavated material surplus shall be minimised so far as practicable; details of all inert material reuse onsite including composition and disposal location must be mapped and records retained. Refer to CL:AIRE DoW:CoP, which is outlined in Appendix 1 (Outline SWMP) section 3.5 to the **Outline CEMP [EN010158/APP/7.2.2]**. • If necessary temporary bunding and/or settlement ponds will be installed to allow for isolation and onsite treatment of any sediment laden or contaminated water prior to discharge to the drainage system. • Spill kits capable of dealing with hydrocarbon and chemical spills shall be available at all worksites. Each storage location shall be clearly visible to the workforce, for instance by deploying clear signage.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• If a compound, fuel storage point or COSHH store is provided then additional spill kits will need to be available at each separate location. • The spill kit contents shall include absorbent pads, absorbent booms, absorbent granules and hazardous waste disposal sacks as a minimum. Regular checks of the spill kits shall be completed to ensure they remain adequately stocked to deal with environmental incidents. • Spill drills shall be performed periodically to confirm that the workforce can effectively contain and clear up potentially polluting spillages. All drills will be documented and details kept on record for the duration of the works. • Water wheel washing or 'dry brush' wheel washing will be undertaken, if required. If water wheel washing is undertaken, it will be undertaken within a contained designated impermeable or lined area and will not be allowed to discharge into a watercourse or infiltrate to groundwater. The site of the wheel washing facilities should be a minimum of 10m from the top of bank of watercourses / ditches.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility

	Spillages and Leaks
	
	All pollution incidents should be managed through the STOP – CONTAIN – NOTIFY concept.
	
	STOP: Immediately stop the discharge to prevent further spread to drainage, waterbody or ground.
	
	CONTAIN: Control the spill to prevent environmental impact, such as by stopping works or using containment material. Personal safety take priority, especially if the spill substance is unknown.
	
	NOTIFY: Promptly inform the appropriate authorities and contacts e.g. Environment Agency and the Applicant.
	
	• Oil, Fuel or Chemical Spill to Ground:
	  ○ Wearing protective clothing, stop release at the source and secure the area.
	  ○ Create temporary bunds to contain the spill if it is migrating.
	  ○ Protect nearby drains/ditches using drain seals or spill kit materials.
	  ○ Absorb the spill with granules or pads from the spill kit.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility

- Notify the Environment Agency with details on time, type/quantity, location, and Site contact information.
- Inform the Applicant and Local Planning Authority if required under Environmental Damage Regulations.
- Keep containment in place until contamination is assessed and a remediation strategy is developed.

- Oil, Fuel or Chemical Spill to Waterbody:
  - Wearing protective clothing, prevent further release at source and contain the spill.
  - Deploy booms from the spill kit across the water to stop spread; tie them to banks and add more as needed.
  - Notify the Environment Agency with discharge details and inform the Client.
- Oil, Fuel or Chemical Spill to Drainage System:
  - Wearing protective clothing, stop further release and deploy drain covers to affected gullies.
  - Supplement containment with booms around the gully to control migration.

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	○ Notify the Environment Agency and relevant water company with details on discharge time, type/quantity, specific drain location, and contact information. ○ Notify the Applicant and Environment Agency as needed. • Silt Discharge ○ Cease dewatering or other activity causing silt release. ○ Use drain seals, hay bales, silt fencing, or bunds to contain and direct silt away from sensitive areas. ○ If the silt discharge enters drains or surface waters without prior approval, notify the Environment Agency and relevant water company. • Contamination involving Wate Materials ○ Evacuate the area if necessary, especially if fumes are present. ○ Assess whether segregation of waste can mitigate the issue. ○ Conduct a risk assessment including COSHH considerations.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	○ If segregation is unsafe, classify the entire waste volume as hazardous. ○ Report the incident to the Applicant. ○ Dispose of waste according to standard site procedures. Discovery of Unexpected Contamination 1. In the event that land contamination, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the Applicant must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency. 2. Where the Applicant determines that remediation of the contaminated land is		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency. 3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2). 4. Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.		
	Development has not yet begun so the specific panel makeup, cabling and firefighting products, is not known. However, the Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used for the Proposed Development and would seek to minimise the level of PFAS in the final equipment selection.	Cables will be routinely tested to monitor insultation defects and degradation. Any failing cable would be replaced before it could cause an unplanned outage. All equipment or firefighting products will have routine	

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
		periodic testing and/or visual inspection to monitor defects and degradation. Equipment will be replaced if damage or degradation is identified.	
Impact of firewater associated with the operational BESS	• The BESS units will be constructed on concrete bases – to prevent discharge of contaminated firewater into the watercourses. • Systems will be in place to isolate and contain any firewater runoff and this will incorporate appropriate containment measures within drainage features and storage components to ensure a sealed and isolated system via use of a sealing and isolatable system which would include a bund and automated isolation system (e.g. a penstock system) with a manual backup. An outline maintenance schedule of the pen stock is included within the **Outline BSMP [EN010158/APP/7.9.4]**. • Containment of contaminated water within an underground attenuation tank or bunded holding lagoons. • Testing of the contaminated water following the fire event.	Inspections of the containment measures will be undertaken following removal of silt and aggregate to ensure the containment measures have not been compromised. If damage to the containment measures is identified, this will be repaired immediately.	

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• If contaminated, the firewater would be collected and tankered offsite to be disposed of in an environmentally safe manner.		

Table 3.6: Soil

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Compaction, damage and deterioration of soil and agricultural land as a result of trafficking of agricultural land by vehicles and compounds.	The timing of works will be managed carefully to consider weather conditions, particularly heavy and persistent rain to minimise vehicles travelling across the Site when soil conditions are wet. Management of vehicle movement. Established tracks used for vehicle movement during operation. Storage of topsoil within bunds and seeded for periods greater than six months.	N/A	Principal Contractor Responsibilities will be confirmed within the OEMP(s).

Table 3.7: Noise and vibration

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Noise impact at the nearest noise sensitive	Use of equipment with low noise emissions, where feasible. Orientating noise emitting equipment to reduce noise level beyond the Order Limits.	Noise measurements of the installed operational equipment will be undertaken to verify predicted levels at	The Applicant Principal Contractor

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
receptors/residential properties is reduced.	Compliance with best practice measures	source align with values used within the detailed design noise prediction model.	Responsibilities will be confirmed within the OEMP(s).

Table 3.8: Water

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Pollution discharge to watercourses and degradation to water quality during operations	Measures to reduce any residual effects on water quality include: • No vehicle, equipment or material storage is permitted within the Flood Zone 2 or Flood Zone 3 or within 20m of watercourses, where practicable. • Vehicles to be inspected at the start of each day, and vehicles showing signs of fuel/oil drips, missing fuel caps, or damaged hydraulics would be rejected and not used on Site before repair. • Spill kits would contain as a minimum: spill booms, granules, mats and gully covers. The measures outlined in **Table 3.5** in relation to groundwater will also be adhered to in order to protect surface water quality. If uncontaminated firewater is captured, it is recognised that a water discharge activity permit or	Water monitoring regime will be undertaken 12-months post-construction. Further details of the monitoring would be set out at detailed design stage and in agreement with the Environment Agency and Buckinghamshire Council.	Responsibilities will be confirmed within the OEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	other environmental permit may be required to release uncontaminated firewater to the local drainage network as set out in section 6.7 of the **Outline Drainage Strategy [EN010158/APP/7.11.3]** and section 6.6 of the **Outline BSMP [EN010158/APP/7.9.3]**. Further detail on firewater containment, storage capacity and operational controls will be confirmed at detailed design to ensure continued safe and resilient operation of the BESS during any period of retained storage		
Flood risk	• A Flood Management and Evacuation Plan would be produced prior to the operational (including maintenance) phase commencing for any areas of the Proposed Development (mainly Internal Access Corridors and Solar PV modules) that intersect areas of flood risk.	Following a flood event, visual inspections along the fencing will be undertaken to identify any blockage which, if identified, will be cleared and any remedial works undertaken.	

4. Implementation

4.1.1. The detailed OEMP(s) will set out all roles, responsibilities and actions required in respect of implementation of the measures described in this Outline OEMP including:

- An organogram showing team roles, names and responsibilities;
- Training requirements for relevant personnel on environmental topics;
- Information of onsite briefings and Toolbox Talks that will be used to equip relevant staff with the necessary level of knowledge to follow environmental control procedures;
- Measures to advise employees of changing circumstances;
- Communication methods;
- Document control;
- Monitoring, inspections and audits of site operations; and
- Environmental emergency procedures.

4.1.2. Detailed OEMP(s) are also to include further details of the following measures:

- Details of lighting arrangements;
- Details of site security and fencing arrangements;
- Details of parking provisions;
- Information regarding procedures for the accidental release of potential pollutants including fuel/oil spillage and surface water release, including pollution incident response plans;
- Monitoring requirements;
- Details of accordance with the SWMP.

4.1.3. In addition, the environmental management plans detailed in **Paragraph 1.1.11** are to be prepared as part of the OEMP(s) prior to the operational (including maintenance) phase.

5. Monitoring and Reporting

5.1. Process for Monitoring and Inspections

5.1.1. Monitoring and reporting will be undertaken for the duration of the operational phase in order to demonstrate the effectiveness of the measures set out in the Outline OEMP and related operational controls and allow for corrective action to be taken where necessary.

5.1.2. As part of the monitoring process a designated Environmental Manager will observe site activities and report any deviations from the OEMP in a logbook, along the with the action taken and general conditions at the time. In addition, the Environmental Manager will conduct regular walkover surveys which will be documented and arrange regular formal inspections to ensure the requirements of the OEMP are being met.

5.1.3. The Environmental Manager would also act as day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.

5.2. Records

5.2.1. Records will be managed through the Quality and Safety Management Systems (QMS) and the Environmental Management System (EMS) of the Applicant which will be certified in line with the ISO 14001 standards.

5.2.2. The Environmental Manager will retain records of environmental monitoring and implementation of the OEMP. This will allow provision of evidence that the OEMP are being implemented effectively. Documents shall be stored in a suitable manner and backups created to safeguard the records. These records will include:

- Results of routine site inspections by Environmental Manager/Project Manager;
- Environmental surveys and investigations;
- Environmental Action Schedule;
- Environmental equipment test records;
- Licenses and approvals; and
- Corrective actions taken in response to incidents, breaches of the approved OEMP or complaints received from a third party.

6. References

- **Ref. 1:** Government (2013), The Waste Electrical and Electronic Equipment Regulations (2013). Available online: https://www.legislation.gov.uk/uksi/2013/3113/contents/made.
- **Ref. 2:** The Environment Act 2021. Available online: https://www.legislation.gov.uk/ukpga/2021/30/contents https://www.legislation.gov.uk/ukpga/2021/30/contents
- **Ref. 3:** Department for Environment, Food and Rural Affairs (2018). Resources and waste strategy for England. Available online: https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england