Rosefield Solar Farm

Outline Decommissioning Environmental Management Plan (Clean)

EN010158/APP/7.4.4
Revision 4
Deadline 3
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Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)
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1. The 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 tenants and Anglian Water's request around consultation on buried utilities. 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 Decommissioning Environmental Management Plan (Outline DEMP) has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to detail management methods to ensures that potential impacts on the environment during decommissioning will be mitigated 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 DEMP(s) will be produced for the Proposed Development in accordance with Requirement 18 in the **Draft Development Consent Order (DCO) [EN010158/APP/3.1]** prior to commencement of decommissioning. Detailed DEMP(s) will be required to be substantially in accordance with this Outline DEMP.

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

1.1.5. This document does not address measures for the operational or construction phase, which are provided in the separate **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3]** and the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2].**

1.1.6. 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 measures were accounted for in the assessments, and these will be implemented during decommissioning of the Proposed Development. This Outline DEMP outlines how these measures will be implemented through

the detailed DEMP(s). It also sets out the monitoring activities designed to demonstrate that such mitigation measures are carried out, and that they are effective.

1.1.7. The detailed DEMP(s) will be prepared and submitted for approval by the local planning authority following the appointment of a Principal Contractor, prior to the start of the decommissioning of the Proposed Development.

1.1.8. This Outline DEMP has been prepared with the objective of compliance with the relevant legislation and mitigation measures identified through the EIA process. Any additional licenses, permits or approvals that are required for the decommissioning phase of the Proposed Development and that are not disapplied by the DCO, will be set out in the detailed DEMP(s).

1.1.9. This Outline DEMP provides the likely structure of the detailed DEMP(s) and controls which might be included within the detailed DEMP(s) to deliver the decommissioning phase of the Proposed Development.

1.1.10. The appointed Principal Contractor will be responsible for working in accordance with the environmental controls documented in any approved detailed DEMP(s), which will be in substantial accordance with this Outline DEMP. The overall responsibility for implementation of the detailed DEMP(s) will lie with the appointed Principal Contractor as a contractual responsibility to the Applicant.

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

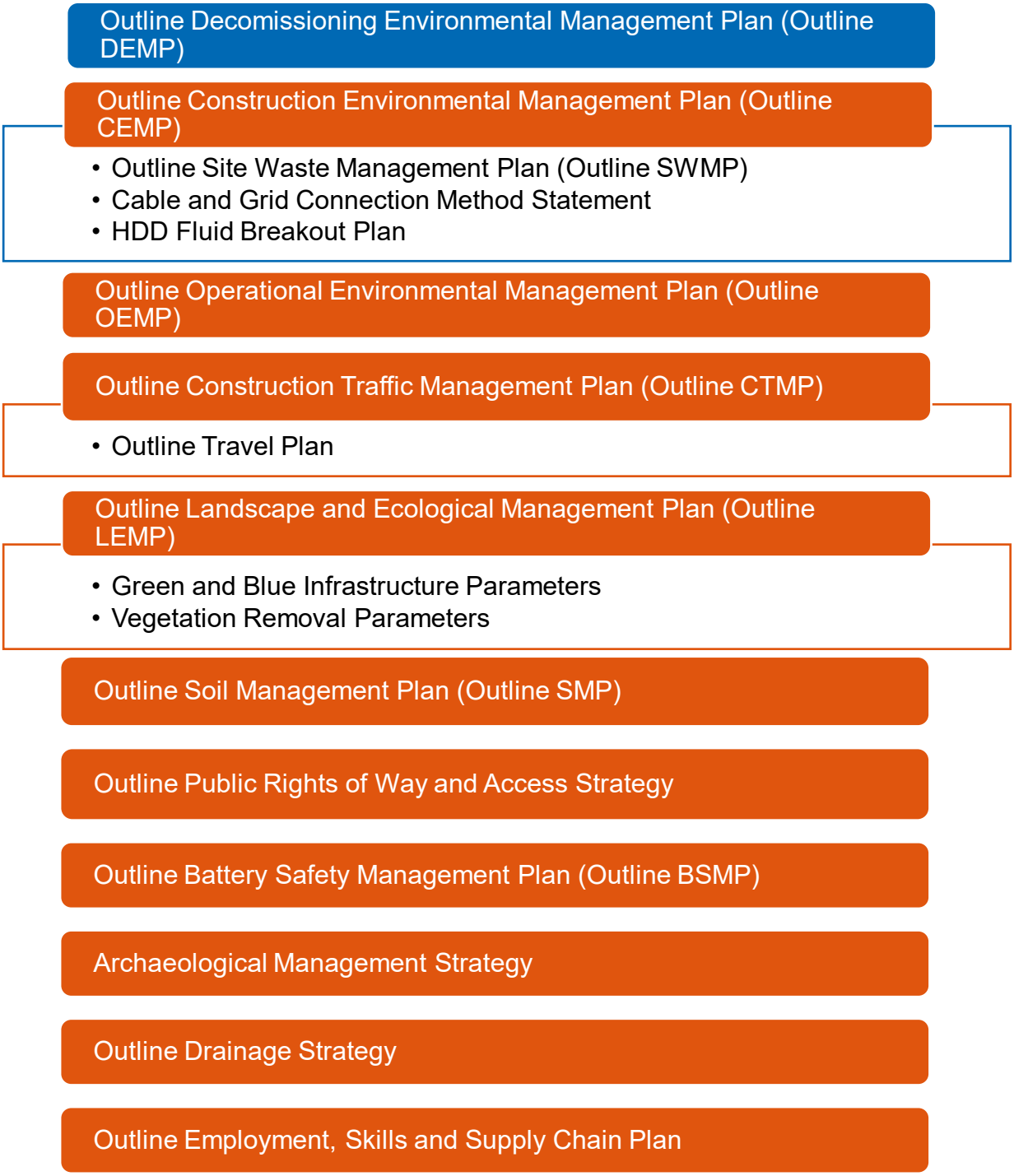

Figure 1: Outline Management Plans

1.1.12. The following additional environmental management plans are secured by this Outline DEMP and will be prepared as part of the detailed DEMP(s) prior to decommissioning of the Proposed Development:

- Dust Management Plan;

- Emergency Preparedness and Response Plan;
- Traffic Management Plan and Travel Plan;
- Flood Management and Evacuation Plan;
- Site Waste Management Plan; and
- Health and Safety Plan.

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 (shown in **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**) within which the Proposed Development can be carried out in accordance with the **Works Plans [EN010158/APP/2.3]**. Land within the Order Limits is known as the 'Site'.

1.2.4. A summary of the description of the Proposed Development can be found in Section 3.1 of the **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. The terminology used in this document is defined in the **Glossary [EN010158/APP/6.1]**.

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. Decommissioning Environmental Management

2.1. Roles and Responsibilities

2.1.1. The Principal Contractor shall make available sufficient time and resource for the effective management of environmental risks that could arise during decommissioning work. This includes appointing adequately qualified personnel with knowledge and capability in the environmental management of decommissioning site works. Persons having responsibility for environmental site management, and in particular any persons required to undertake and oversee response to any incidents with potential environmental consequences, shall be empowered to make decisions and take appropriate actions necessary to avoid or mitigate adverse environmental effects, even when this may lead to delay and/or additional cost to the Principal Contractor.

2.1.2. The Applicant and all appointed contractors will be responsible for ensuring that the potential risks to the environment are adequately avoided or controlled by the application of measures as documented within the detailed DEMP(s), which shall be complied with throughout decommissioning. The main organisations and persons involved in the decommissioning stage of works are set out in Table 1. The key roles and responsibilities during the decommissioning phase in managing environmental impacts will likely include, but are not limited to:

- **Site Manager** – overall responsibility for activity on Site, and will be based on-site full time;
- **Decommissioning Project Manager** - overall responsibility for ensuring all elements in the DCO, detailed DEMP and all environmental, legal and other requirements are implemented, and appropriately resourced, managed, reviewed and reported;
- **Environmental Manager** - responsible for the overall management of environmental aspects on Site, 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 or 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 the monitoring and controlling of health and safety compliance and related rules and regulations on-site.
- **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.

2.1.3. These roles and responsibilities are indicative and will be confirmed in the detailed DEMP(s).

Table 1: Project roles and environmental responsibilities

Process Task	Role[1]			
	Site Manager	Decommissioning Project Manager	Environmental Manager	Health and Safety Manager
Developing and maintaining the DEMP	C	M	R	A
Monitor environmental aspects through review of method statements, identify and control issues	A	M	R	C
Monitoring works to ensure any necessary environmental issues and control measures are in place; ensuring they are effectively communicated, appropriate and implemented on-site	A	M	R	C

[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	Decommissioning Project Manager	Environmental Manager	Health and Safety Manager
Ensuring the work is performed by trained and qualified staff; and providing training where necessary	A	M	R	C
Ensuring the adequate resources are allocated for environmental management	A	M	R	I
Ensuring that all relevant environmental documentation and information (including permission, consents, permits and assessments) is communicated	A	M	R	C
Regular site inspections and maintaining a record of environmental performance and reporting performance and monitoring environmental performance.	A	M	R	C
Following good practice and minimising impact on the environment	A	M	R	C
Understanding project environmental obligations and mitigation measures	A	M	R	C
Liaison with local authority, other statutory bodies, members of the public, press and the media	A	M	R	C
Supporting all site staff with environmental management including reviewing and	R	M	C	R

Process Task	Role[1]			
	Site Manager	Decommissioning Project Manager	Environmental Manager	Health and Safety Manager
commenting on method statements and risk assessments				
Ensuring that the environmental policy of the Applicant is delivered	A	M	R	C
Providing information on waste management/reduction procedures to relevant staff	A	M	R	C

2.2. Decommissioning Programme

2.2.1. The Proposed Development will be decommissioned after 40 years of operation.

2.2.2. Decommissioning is expected to take approximately 24 months and may be undertaken in phases.

2.2.3. Further details on the decommissioning phasing will be provided within the detailed DEMP(s) in consultation with Local Planning Authority, prior to decommissioning commencing.

2.3. Decommissioning activities

2.3.1. 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

2.3.2. Decommissioning activities will involve the removal of all of the Solar PV infrastructure, including the Ground Mounted Solar PV Generating

Stations, Collector Compounds, Rosefield Substation, BESS and ancillary infrastructure, including any onsite compounds.

2.3.3. At the end of the operational (including maintenance) phase, any above-ground infrastructure will be dismantled and removed per industry best practices. The decommissioned materials will follow the waste hierarchy such that they will be reused where possible before recycling and disposal are considered.

2.3.4. During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m. All the below-ground cables below 1m will be left in situ, however, this will be dependent upon the legislation and industry standards at the time of decommissioning.

2.3.5. This approach reflects common practice for Electricity Distribution Network Operators infrastructure (such as substations) and the associated export cables. It is not anticipated that the cables that are left in situ below 1m buried underground would cause any contamination.

2.3.6. The Site will be reinstated in accordance with any approved detailed DEMP(s). The detailed DEMP(s) will be subject to the approval of the local planning authority at the time of decommissioning.

2.3.7. The decommissioning phase would see the land returned to the landowner. The permanently diverted PRoWs would not be altered any further and would remain, post-decommissioning of the Proposed Development. Subject to discussion with the landowner, it is assumed that the permissive footpaths would be removed at the end of operation.

2.3.8. Landscape structural planting, including tree planting, hedgerows, scrub, etc., created to deliver biodiversity mitigation and enhancement associated with the Proposed Development would be left in situ when the Site is handed back to the relevant landowners, after which the Applicant would no longer have control of the Site. Earth bund(s) would also be removed/reinstated to allow the fields to be returned to agricultural use. Otherwise, it is assumed that the landowner would return the land to agricultural use following decommissioning.

2.4. Site Set Up and Compounds

2.4.1. Temporary Primary and Secondary Decommissioning Compounds would be created to house necessary plant and equipment and provide areas for parking for staff. These Compounds would be removed and the ground restored upon completion of the decommissioning phase.

2.4.2. Further details of the Site layout and Decommissioning Compounds will be included in the detailed DEMP(s).

2.5. Working Hours

2.5.1. The normal (or core) hours of working on any part of the development during the decommissioning period will be:

- 7 am to 7pm on Mondays to Fridays;
- 7 am to 12pm on Saturdays.

2.5.2. The following controls will also apply to the works:

- No work would be undertaken on Sundays or Bank Holidays without prior agreement with Buckinghamshire Council as the host Local Planning Authority.
- Working days would consist of one 12-hour shift, with employees travelling to and from Site an hour on either side of these times (i.e. between 6am - 7am and 7pm - 8pm).
- Where onsite works are to be conducted outside the core working hours, they will comply with the restrictions outlined in Section 2.8 and would be agreed upon with Local Planning Authority.
- Between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the decommissioning activity proposed to take place and its proximity to sensitive receptors.
- Further detail is outlined in Section 2.8: Control of Noise within this Outline DEMP.

2.6. Site Security

2.6.1. Site security during decommissioning will be managed by the Principal Contractor. The Site security fencing will remain in place throughout the duration of the decommissioning period and will be the last feature to be removed from the Proposed Development. Any storage of materials would be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the contractor.

2.6.2. Further details of site security and fencing to be installed during the decommissioning phase will be included in the detailed DEMP(s).

2.7. Control of Light

2.7.1. Temporary Site lighting, in the form of mobile lighting towers will be required in areas where natural lighting is unable to reach (sheltered/confined areas) and during core working hours within winter months. Artificial lighting would be provided to maintain sufficient security and health and safety for the Order Limits, whilst adopting the mitigation principles to avoid excessive glare and minimise spill of light to nearby

receptors (including ecology and residents) outside of the Order Limits as far as reasonably practicable.

2.7.2. All decommissioning lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors:

- The use of lighting will be minimised to that required for safe Site operations;
- Lighting will conform to best practice guidelines with respect to minimising light spill into adjacent habitats and prevent disturbance to bats and other species during decommissioning;
- Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via use of light hoods/cowls which direct light below the horizontal place, preferably at an angle greater than 20° from horizontal); and
- Lighting will be directed towards the interior of the Order Limits rather than towards the boundaries.

2.8. Control of Noise

2.8.1. Between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors.

2.8.2. Activities such as Abnormal Indivisible Load (AIL) deliveries could be required outside of the assumed day-time construction hours (i.e. evening, Sundays, Bank Holidays or at night).These works and any associated mitigation measures will be agreed upon with the relevant planning authority prior to these works.

2.8.3. Applications for Section 61 consents, variations and dispensations under the Control of Pollution Act 1974 (COPA), or equivalent process at the time, if this process has been superseded, will be submitted to the local planning authority for decommissioning activities.

2.8.4. Noise thresholds have been identified for nearby sensitive receptors, presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** (and based off Annex E of BS5228-1), and the applicable noise thresholds will be defined in each of the detailed DEMP(s). Thus, where on-site works are to be conducted outside of the core working hours, they will comply with any restrictions agreed with Local Planning Authority and reflected in the detailed DEMP(s), in particular regarding the control of noise and traffic.

2.8.5. There are mitigation measures that can be applied to minimise noise levels from piling activities in instances where the piling works are predicted to give rise to significant adverse effects at noise sensitive receptors.

2.8.6. Mitigation measures for piling works are typically applied at the source in the form of shrouds and/or resilient pads between the pile and the driver. Noise reduction from these measures should be expected to be in the range of 10-15 dB.

2.8.7. If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works. The plant would be installed and operated such that noise levels do not exceed a level of 45dB LA_{eq} at the closest neighbouring noise-sensitive locations during night-time operation of equipment. Depending on the plant used, location, pit depth, etc., this may require the use of acoustic screening using temporary solid barriers with a height of at least that of the drilling equipment located in proximity (around 10m or less) of the trenchless drilling work.

2.8.8. Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. In addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' **[Ref. 6]** would be implemented, where applicable.

2.9. Decommissioning Traffic Management and Access Route

2.9.1. During decommissioning, the contractor will ensure that the impacts from decommissioning traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable.

2.9.2. PRoW user desire lines may change over time, therefore, prior to the commencement of the decommissioning phase the management of these PRoW will be detailed in the detailed DEMP(s) and approved by the Local Planning Authority.

2.9.3. In the interests of highway safety, wheel cleaning facilities will be used by vehicles prior to exiting the Order Limits onto the public highway if there is mud or debris from the decommissioning Site.

Parking provisions

2.9.4. Car parking for staff during the decommissioning phase will be provided within the temporary Decommissioning Compounds. These would be removed upon completion of the decommissioning phase.

2.9.5. Details of the temporary Decommissioning Compounds, including the location and size of parking provisions, loading and unloading areas for plant and materials, storage areas, wheel washing facilities will be confirmed with the Contractor and set out in the Decommissioning Traffic Management Plans (DTMP)(s).

2.10. Decommissioning Waste Management

2.10.1. At the end of the operational (including maintenance) phase, any above-ground infrastructure will be dismantled and removed per industry best practices. The decommissioned materials will follow the waste hierarchy such that they will be reused where possible before recycling and disposal are considered.

2.10.2. Solar PV modules are made up of several materials, including a metal frame. Approximately 99% of the Solar PV module can currently be recycled. When decommissioning, options to reuse or recycle materials available at the time will be explored to ensure that as much of the materials as possible are recycled and diverted from landfills.

2.10.3. The Proposed Development is anticipated to generate a substantive amount of Waste Electrical and Electronic Equipment (WEEE) at decommissioning which would include Solar PV modules, batteries, and substation equipment, as well as other smaller quantities of WEEE from supporting electrical infrastructure. As such, these will be recovered and recycled by an authorised re-processor 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 decommissioning phase of the Proposed Development.

2.10.4. In order to control the waste generated onsite and removal of materials, the contractor will separate the main waste streams onsite, prior to transport to an approved, licensed third party waste facility for recycling or disposal.

2.10.5. Prior to the decommissioning works commencing, a Site Waste Management Plan (SWMP) will be prepared by the contractor 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 (Outline SWMP)** included as **Appendix 1** of the **Outline Construction Environmental Management Plan [EN010158/APP/7.2],** updated as appropriate in line with industry best practice and relevant legislation at the time of preparation to reflect the circumstances prevailing during the period in which decommissioning is to be carried out.

2.10.6. 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.

2.11. Environmental Incidents and Emergencies

2.11.1. An Emergency Preparedness and Response Plan will be developed in consultation with the Local Planning 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.

2.11.2. The plan will also detail the 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.

2.11.3. The Abnormal Indivisible Loads (AIL) access located in the north of Parcel 3 would not be used during flood events.

2.11.4. The **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **Outline Drainage Strategy [EN010158/APP/7.11.3]** set 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.

2.12. Protection of Below Ground Utilities

2.12.1. Engagement with Anglian Water Services, and other utilities services where necessary, will be undertaken on a regular basis to ensure their access to their existing and new assets is available throughout the decommissioning period.

2.12.2. Offsets around major utilities will be implemented, as agreed with each utility owner, to avoid impacts.

2.13. Housekeeping and Site Maintenance

2.13.1. Good housekeeping is an important part of good environmental practice and helps to maintain a more efficient and safer site. The Site should be tidy, secure, and have clear access routes that are well signposted. The appearance of a tidy, well-managed site can reduce the likelihood of theft, vandalism, complaints and/or specific hazards that could affect the safe

operation of the other businesses in the area, such as bird hazards and wind-blown litter.

2.13.2. As outlined in the fifth edition of CIRIA's 'Environmental good practice on site guide' (C811) **[Ref. 2],** when considering good housekeeping, the appointed Contractor should implement the following recommendations:

- Adequately plan the Site with designated areas of materials and waste storage;
- Segregate and label different types of waste as it is produced and arrange frequent removal;
- Keep the Site tidy and clean;
- Ensure that no wind-blown litter or debris leaves the site, use covered skips to prevent wind-blown litter;
- Keep hoarding tidy - repair and repaint when necessary, removing any fly posting or graffiti;
- Frequently brush-clean wheel washing facilities and keep haul routes clean from site derived materials;
- Keep roads free from mud by using a road sweeper; and
- Ensure the Site is secure.

2.13.3. In addition, Site personnel should uphold Site etiquette, which includes maintaining personnel cleanliness, such as keeping personal protective equipment (PPE) clean, and using respectful and professional language whilst on and offsite.

2.14. Best Practice Means

2.14.1. The Considerate Constructors Scheme (CCS) will be adopted to assist in reducing pollution and nuisance from decommissioning of the Proposed Development, by employing good practice measures which go beyond statutory compliance.

2.15. Community Liaison and External Communications

2.15.1. Updates will be given to the local community and stakeholders at key milestones to maintain an on-going relationship over the entire lifetime of the Proposed Development. There would also be contact details onsite and online for members of the community and stakeholders to contact the Community Liasion 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 Decommissioning Environmental Management Plan(s) and subsequently during the decommissioning phase. Measures to be

included in the detailed Decommissioning Environmental Management Plan(s) will include:

- providing at least six months advance notification of the location and timing of any decommissioning 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. Decommissioning Environmental Management and Mitigation Procedures

3.1.1. A summary of the mitigation and management measures to be included as minimum in the detailed DEMP(s), using information presented in the **Environmental Statement [EN010158/APP/6.1],** is provided below. It also identifies where monitoring is proposed to assess the effectiveness of the mitigation measures. The nature of decommissioning activities and potential for likely significant effects would be similar to construction, and therefore the detailed DEMP(s) will include similar measures to those included in the CEMP(s).

Table 3.1: Air Quality

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
The exhaust emission impacts from the Proposed Development to residential properties.	Decommissioning traffic routes are planned to avoid passing sensitive villages and residential receptors where possible	N/A	Applicant
Dust and particulate matter emissions during decommissioning phase	*Communications* • Develop and implement a stakeholder communications plan that includes community engagement before work commences on Site. • 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 Environmental Manager/engineer or the Site Manager.	Undertake regular on Site and off Site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the Local Planning Authority when asked. Monitoring will,	Principal Contractor Responsibilities will be confirmed within the DEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	Site management • 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. Make the complaints log available to the Local Planning Authority when asked. Record any exceptional incidents that cause dust and/or air emissions, either on or off Site and the action taken to resolve the situation in the logbook.	where possible, should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100m of the Order Limits in agreement with the relevant homeowners/landowners.	
	Preparing and maintaining the Site • Plan the Site layout so that machinery and dust causing activities are located away from sensitive receptors, as far as is possible. • Erect solid screens or barriers around activities where there is a high potential for dust production. • Avoid runoff of water or mud from the Site. This may include measures such as diverting run-off, installing sediment traps and/or swales. • Keep Site fencing, barriers and scaffolding clean. • Remove materials that have a potential to produce dust from Site as soon as possible, unless being re-used on Site. If they are being re-used on Site cover as described below. • Cover, seed or fence stockpiles to prevent wind whipping.	Carry out regular Site inspections to monitor compliance with the Decommissioning Environmental Management Plan, record inspection results, and make an inspection log available to the Local Planning Authority when asked. Increase the frequency of Site inspections by the person accountable for air quality and dust issues on	

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	Operating vehicle/machinery and sustainable travel • Ensure all vehicles switch off engines when stationary - no idling vehicles. • Impose and signpost a maximum speed limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas. • Implement a Travel Plan that supports and encourages sustainable travel. *Decommissioning operations* • Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems. • Ensure an adequate water supply on the Site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate. • Use enclosed chutes and conveyors, and covered skips. • Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	Site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. During the decommissioning phase, agree dust deposition, dust flux, or real-time PM_{10} continuous monitoring locations with the Local Planning Authority. Where possible, commence baseline monitoring at least three months before work commences on Site. Other monitoring requirements will be confirmed in the DEMP(s).	

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Ensure equipment is readily available on Site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.		
	Measures specific to demolition • Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust). • Ensure effective water suppression is used during demolition operations. • Avoid explosive blasting, using appropriate manual or mechanical alternatives. • Bag and remove any biological debris or damp down such material before demolition.		
	Measure specific to earthworks • Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable. • Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable. • Only remove the cover in stages during work and not all at once.		
	Measures specific to trackout		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the Site. • Avoid any dry sweeping of large areas. • Ensure vehicles entering and leaving Site are covered to prevent escape of materials during transport. • Record all inspections of haul routes and any subsequent action in a Site logbook. • Implement a wheel washing system. *Measures specific to non-road mobile machinery* Ensure that any plant used on Site comply with the nitrogen oxides, particulate matter and carbon monoxide emissions standards specified in the Regulation (EU) 2016/1628 of the European Parliament and of the Council (as amended) **[Ref. 3]** as a minimum, where they have net power of between 37kW and 560kW. The emissions standards vary depending on the net power the engine produces.		

Table 3.2:Biodiversity

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Habitat loss or gain	Mitigation and management of decommissioning related effects on biodiversity, including measures to prevent	N/A	Responsibilities will be confirmed

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Fragmentation of population or habitats **Change in normal conditions (light, noise, vibration, human activity) impacting flora and fauna** **Habitat degradation** **Species mortality**	air, water, light and noise pollution and avoid disturbance to sensitive species. Prior to decommissioning, updated surveys, where required (for example for badgers), would be undertaken in sufficient time in advance of works to ensure that appropriately timed mitigation can be carried out. Appropriate mitigation measures would be based on the results of the updated ecology surveys. Many of the mitigation measures required for the construction phase are also likely to be required during the decommissioning phase. Control measures that will be implemented during construction to protect designated sites, ancient woodland and habitats are: • Using demarcation fencing and signage where appropriate to establish and maintain appropriate buffer zones. This will depend on habitat type. • Mitigation for habitat degradation from potential construction related effects including dust deposition, air pollution, pollution incidents and water quality, would be provided through the adoption of construction industry good practice and environmental protection legislation during construction. For example, prevention of surface and		within the DEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	ground water pollution, soil removal and appropriate re-instatement. *Great Crested Newts* • Decommissioning activities with the potential to affect GCN would be carried out either under the Buckinghamshire District Level Licensing Scheme through NatureSpace Partnership or under a European Protected Species licenced from Natural England. • Appropriate pre-decommissioning GCN surveys will be undertaken. *Reptiles* Appropriate pre-decommissioning reptile surveys will be undertaken. A suitably qualified ecologist will supervise all work and ensure appropriate measures are undertaken to prevent injury and/or death to reptiles. *Ground nesting birds, non-ground nesting birds and wintering birds* • Work within or adjacent to areas which is likely to cause an impact to ground nesting birds, such as within the ecological mitigation areas, will be undertaken outside the nesting bird season whilst also avoiding the peak wintering bird season.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Appropriate pre-decommissioning nesting bird surveys will be undertaken. A suitably qualified ecologist will supervise all work during the nesting bird season and ensure appropriate measures are undertaken to prevent disturbance, injury and/or death to ground nesting birds. • Any vegetation clearance or ground clearance proposed within the nesting bird period 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. Cleared ground would be maintained in a disturbed state in the run up to decommissioning commencing to minimise the risk of ground nesting birds attempting to nest. • Landowners and appropriate stakeholders will be engaged prior to decommissioning to discuss the options available to retain the ecological mitigation areas beyond decommissioning, given the Applicant would no longer have control of the Site.		
	Barn owl, red kite, hobby and peregrine falcon (listed in Schedule 1 of the Wildlife and Countryside Act 1981 (as amended))		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	These species are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) **[Ref. 4]** and are protected against disturbance when they are nesting and/or have dependent young. Surveys for Schedule 1 species would be undertaken in advance of decommissioning works commencing.		
	Bats Landowners and appropriate stakeholders will be engaged prior to decommissioning to discuss the options available to retain habitats which have been created which are likely to be used by foraging and commuting bats, such as the ecological mitigation areas.		
	Otter Appropriate pre-decommissioning otter surveys will be undertaken.		
	Badger Appropriate pre-decommissioning badger surveys will be undertaken.		
Damage to trees and their structure	A site induction must include information on trees and tree protection for all operatives. The induction must include the simple instruction that tree protection fencing must not be moved and the fenced area remain		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	unaltered. Trees must not be damaged, either directly or indirectly, by attaching anything to any part of its structure to erect the protective fencing. Additionally, the following points should be firmly communicated during the induction: • Any inadvertent damage to trees or their protective elements must be reported to a site foreman and corrected immediately, to ensure that it remains effective in protecting the area around trees. If there is any doubt an appointed arboriculturist should be contacted to gain clarification on how to proceed. • No materials, fuel, large volumes of water or chemicals to be discharged or mixed where they are likely to flow toward trees in the event of spillage. • Wheel wash stations should be self-contained units where they are sited near retained trees or resultant water must be directed well away from areas where they may flow toward tree root areas. • Any concrete mixing stations must have protective bunds constructed around them to ensure containment of resulting debris or contaminants. • Any spillages of potential contaminants near trees must be reported immediately to the site manager or arboricultural consultant and action taken to either flush the soil with large volumes of water or create a		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	bund to avoid contaminants flowing toward tree protection areas.		

Table 3.3: Climate

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
The risks presented by climate hazards	Weather forecasts would be used to inform the sequencing of activities and the use of appropriate personal protective equipment (PPE)	N/A	Responsibilities will be confirmed within the DEMP(s).
	Provision of welfare facilities including breaks, shade, and hydration facilities, as well as first aid amenities.		
	Provision of an Emergency Response Plan, to include on-site fire prevention, suppression, and evacuation procedures.		
	Provision of an Incident Response Plan that identifies flooding as a key site risk and identifies the correct policies and procedures to follow in the event of such.		
	Monitoring and maintenance of plant and equipment to ensure compliance of machinery with design specifications and flexibility in the construction activities programme to account for climatic variation.		
	Appropriate on-site storage of plant and equipment.		

Table 3.4: Cultural Heritage

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Damage to sensitive archaeological remains	No intrusive groundworks in areas of high archaeological value.	N/A	Responsibilities will be confirmed within the DEMP(s).
Damage to the relict medieval and post-medieval field systems (HA6).	No removal of important hedgerows.		
Unnecessary disturbance of below ground archaeological remains.	Methodologies for decommissioning will be agreed with Buckinghamshire Council and Historic England in advance of the decommissioning works to avoid disturbance to below ground archaeological remains. Care to be taken when removing piles.		
Damage to sensitive archaeological remains.	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 Decommissioning Environmental Management Plan(s).		
Increased traffic flows on the contribution of setting to the significance of the	Decommissioning traffic to be routed away from Botolph Claydon.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
listed buildings and conservation area.			

Table 3.5: Landscape and Visual

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Damage to existing and established hedgerows, trees and woodland.	Ensure that decommissioning is undertaken in a sensitive manner, providing root protection as appropriate to the existing and retained vegetation within the Site. It would ensure that existing and established hedgerows, trees and woodland would be retained and protected during decommissioning (except where removal is required to facilitate decommissioning).	N/A	Principal Contractor Responsibilities will be confirmed within the DEMP(s).
Impact to visual receptors	Ensure that decommissioning compounds maintain a neat and tidy appearance and that any temporary lighting is operated in accordance with a scheme agreed with the Local Planning Authority.		

Table 3.6: Land and Groundwater

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Contamination of soil/groundwater/surface water related to potential spills from construction	During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m. All the below-ground cables below 1m will be left	The activities undertaken during the decommissioning phase will be audited against the requirements of the	Principal Contractor

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
plant through operation or refuelling activities, and spillages and leaks of fuels, oils and chemicals. **Changes to land drainage as a result of piling activities, earthworks, access tracks and excavation.** **Compaction and deterioration of soil and agricultural land as a result of trafficking of agricultural land by decommissioning vehicles, compounds, installation of the cable route and earthworks.** **Deterioration of soil due to handling during decommissioning**	in situ, however, this will be dependent upon the legislation and industry standards at the time of decommissioning. Before any decommissioning activities occur near the identified wells, an updated investigation as to the status of these wells will need to be undertaken and, if they remain operational, appropriate mitigation put in place and the detailed Decommissioning Environmental Management Plan updated accordingly. 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 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	DEMP(s) and the Soil Management Plan (SMP) by the Principal Contractor to ensure adherence.	Responsibilities will be confirmed within the DEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	measures must be inspected frequently and maintained throughout the works. • Stockpiles of contaminated materials must be situated on an impermeable surface at least 10m from any surface waters or drains, and run-off collected within a bund. If required, these would be covered, or stored in a suitable container, to prevent leaching of contaminants. • Tracking or washing out next to drains/surface waters must be avoided. • When dewatering, any pump shall be switched off before removing the last potion of water and suspended solids will be allowed to settle out before discharging. • All drains located adjacent or near to generators to be covered with drain guards. • Potentially contaminated water must be tested before dewatering. 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		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	water volumes used to supress dust, batter/sheet stockpiles where required. • If a discharge consent is required, then all conditions within the consent must be understood before commencement of dewatering. • 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 fire water and surface water runoff. All bunds will have 110% capacity of oil in the transformers as per the relevant requirements. • 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 should 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.		
	Fuel storage		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• 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. • Spill kits will be available within each plant on site and located close to identified pollution sources or sensitive receptors (fuel storage areas, water course crossings, etc.).		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• 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 contractor's 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* • 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		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	watercourse and >50m 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. • Drip trays or equivalent should be used for all refuelling plant. • Refuelling will always be supervised by a competent supervisor. • 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. • Concrete wash-out on site shall only be permitted when the Contractor has provided a designated, suitably prepared wash-out area		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	with signage identifying the area as suitable for wagon wash-out. • Concrete wash-out may be dried and crushed to be re-used on Site or disposed of in accordance with a Site Waste Management Plan. • Surplus dry concrete, cement and grout is to be collected and reused where possible e.g., as inert rubble; reuse of dried materials may require environmental permits or exemptions. • Areas of permeable pavements are not to be used for the temporary storage of cement bags. If unavoidable ensure adequate protection measures are in place to prevent the pavement from becoming blocked. • 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 on Site. • All hazardous materials shall be labelled, sealed and stored with their Control of Substances Hazardous to Health (COSHH) assessment in a bunded and lockable container		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	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 designated container within the waste compound. • Construction workers are required to wear PPE such as gloves and face masks (where appropriate) to prevent dermal contact and inhalation or ingestion.		

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 Applicant. *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 Waste Materials • Evacuate the area if necessary, especially if fumes are present. • Assess whether segregation of waste can mitigate the issue.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Conduct a risk assessment including COSHH considerations. • 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.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	2. Where the Applicant determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures will 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. Land drainage system which are damaged would either be reinstated or diverted to ensure that there would be no lasting impact from the baseline.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Impact of contaminated fire water associated with the BESS	To manage the potential impact of contaminated fire water associated with the BESS, the procedures for managing the fire water and mitigating any impact to the environment are: • The BESS units will be constructed on concrete bases – to prevent discharge of contaminated fire water into the watercourses. • Systems will be in place to isolate and contain any fire water runoff via use of impermeable membranes and a bund and manual or automated penstock system. • Containment of contaminated water within an underground attenuation tank or bunded holding lagoons. • Testing of the contaminated water following the fire event. • If contaminated, the fire water would be collected and tankered offsite to be disposed of in an environmentally safe manner. BESS site protection for firewater segregation will remain in place until the BESS units are removed so that the risk is managed throughout the decommissioning phase.		

Table 3.7: Soil

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Compaction and deterioration of soil and agricultural land as a result of trafficking of agricultural land by decommissioning vehicles, compounds and earthworks.	Management of vehicle movement 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. Monitoring of soil stockpiles	The activities undertaken during the decommissioning phase will be audited against the requirements of the DEMP(s) and the Soil Management Plan (SMP) by the Principal Contractor.	Principal Contractor Responsibilities will be confirmed within the DEMP(s).
Deterioration of soil condition	Return the land back to its prior ALC grade by removing infrastructure up to 1m depth BGL		

Table 3.8: Noise and vibration

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Noise impact at the nearest noise sensitive receptors/residential properties is reduced.	Use of equipment with low noise emissions, where feasible. Orientating noise emitting equipment to reduce noise level beyond the Order Limits. Best Practicable Means as defined by the Control of Pollution Act 1974 **[Ref. 5]** would be adopted, which would serve to minimise the potential noise and	Targeted short-term attended monitoring to be undertaken at key sensitive receptors to ensure noise levels remain within defined acoustic criteria.	The Applicant Principal Contractor Responsibilities will be confirmed within the DEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	vibration impacts at receptors in the vicinity of the decommissioning works. A number of measures that may be employed where reasonably practicable to mitigate the noise level impact from the decommissioning phases are outlined below: • Where practicable, temporary enclosures will be used to screen all static or semi-static plant from noise sensitive receptor locations • All engine compartments or acoustic enclosures are closed whilst engines are running • Minimising drop heights of materials i.e. carefully depositing materials • Avoiding vehicle movements over irregular surfaces (which tends to create more noise/vibration emissions) • At all times, workers' shouting or raised voices to be kept to a minimum; • All plant, equipment and noise control measures applied to plant and equipment to be maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Any plant, equipment or items fitted with noise control equipment found to be defective will not be operated until repaired • Machines in intermittent use to be shut down or throttled down to a minimum during periods between works • A quiet working ethic will be employed to ensure that all members of the workforce have consideration for the nearby residents • Prohibit sounding of vehicle horns to gain access to the Primary and Secondary Construction Compounds • The delivery routes set out in the **Outline CTMP [EN010158/APP/7.5]** will be communicated to and adhered to by all suppliers • Design the Primary Construction Compound and Secondary Construction Compound layouts to reduce the need for reversing vehicles and ensure that drivers are familiar with the worksite layout • Utilise reversing alarms incorporating one or more of the features listed below (or other comparable system): • Highly directional sounders		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• Use of broadband sounders • Self-adjusting output sounders • Flashing warning lights; and • Reversing alarms that are set to the minimum output noise level required for health and safety compliance. • Toolbox talks carried out by the Principal Contractor to ensure that all members of the workforce are aware of potential noise impacts on the sensitive receptors in the surrounding area. • Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. • The control measures with regards noise set out in The British Horse Society document 'Advice on Construction sites and horses' **[Ref. 6]** would be implemented, where applicable.		

Table 3.9: Water

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
Pollution discharge to watercourses and degradation to water quality during decommissioning	The protection of water quality would be focused on reducing the mobilisation of silt and pollutant chemicals from entering watercourses, usually via rainfall runoff. The measures outlined in **Table 3.6** in relation to groundwater will also be adhered to in order to protect surface water quality. Further pollution prevention management measures, above those mentioned in **Table 3.6** are outlined below: • No vehicle, equipment or material storage is permitted within the Flood Zone 2 or Flood Zone 3 or within 20m of watercourses, where practicable. • The placement of stockpiled materials as far away as practically possible from sensitive receptors (including watercourses). • Vegetation removal to be undertaken on a phase-by-phase basis to avoid excessive exposure of bare soil. • Silt fencing or straw bales to be placed downslope of decommissioning works to prevent silt entering watercourses. • Additional silt fencing kept on site for deployment at short notice.	A water monitoring regime will be undertaken during the decommissioning phase. Further details of the monitoring would be set out at detailed design stage and in agreement with the Environment Agency and Buckinghamshire Council.	Principal contractor Responsibilities will be confirmed within the DEMP(s).

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	• A wheel wash at the Site access to reduce silt migration across the Site. • 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. • Fuels would be stored in a double skinned locked and bunded fuel bowser as far away from watercourses as reasonably practicable. Refuelling would be carried out over a drip tray. These would be regularly maintained and inspected for rainwater. Rainwater would be removed by specialist removal. A spill kit would be located next to any bowser. • Spill kits would contain as a minimum: spill booms, granules, mats and gully covers. • All surface waters and drains must be protected from silt runoff using gully guards, straw bales, gravel traps or silt fencing. These measures must be inspected daily. Drainage during decommissioning will be handled one of two ways. Either the permanent drainage will be removed last from site, if this is achievable. If this is not achievable, a temporary drainage system will be		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	installed similar to that proposed for the construction phase: A temporary drainage strategy would be implemented during decommissioning works to control runoff rates and sediment mobilisation to ensure water does not enter surface water drains without treatment. This would include identifying all land drains and waterbodies in the Order Limits and ensuring that they are adequately protected using drain covers, sand bags, earth bunds, geotextile silt fences, straw bales, or proprietary treatments (e.g. lamella clarifiers). Site drainage, including surface runoff and dewatering effluents, will be discharged to sewers where practicable and relevant permissions will be obtained from the sewerage or statutory undertaker. Discharge to watercourses will only be permitted where discharge consent or other relevant approval has been obtained (where necessary). The drainage during decommissioning will receive appropriate pollution control measures as agreed with the sewerage undertaker or the Environment Agency as appropriate. Holding or settling tanks, separators, and other measures may be required, will be provided and maintained.		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	The relevant sections of BS 6031: Code of Practice for Earthworks will be followed for the general control of site drainage. Appropriately sized runoff storage areas for the settlement of excessive fine particulates in runoff will be provided. Construction site runoff will either be treated on-site or discharged under a Water Discharge Activity Permit from the Environment Agency to Controlled Waters (potentially also including infiltration to ground) or to the nearest public sewer with sufficient capacity for treatment following discussions with Anglian Water, or removed from site for disposal at an appropriate and licensed waste facility. Further detail on the process will be provided at detailed design stage and included in the detailed Decommissioning Environmental Management Plan.		
	If uncontaminated firewater is captured, it is recognised that a water discharge activity permit or 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		

Potential impact	Mitigation / Enhancement Measure	Monitoring Requirements	Responsibility
	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.		
Increase in flood risk	A Flood Management and Evacuation Plan would be produced prior to the decommissioning 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.	Principal contractor Responsibilities will be confirmed within the DEMP(s).

4. Implementation

4.1.1. The detailed DEMP(s) will set out all roles, responsibilities and actions required in respect of implementation of the measures described within this Outline DEMP, 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 as work progresses;
- Communication Strategy (internal and external);
- Procedures for monitoring, inspections and reporting of site operations;
- Document control; and
- Environmental emergency procedures.

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

- Method Statements;
- Decommissioning programme;
- Hours of work;
- Details of lighting;
- Details of site security and fencing arrangements;
- Details of Site set up, layout and use of decommissioning compounds, including 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;
- Accordance with the SWMP.

4.1.3. In addition, the environmental management plans detailed in **Paragraph 1.1.10** are to be prepared as part of the detailed DEMP(s) prior to the decommissioning phase.

5. Monitoring and Reporting

5.1. Process for Monitoring, Inspections and Audits

5.1.1. Monitoring and reporting will be undertaken for the duration of the decommissioning phase in order to demonstrate the effectiveness of the requirements and measures set out in the detailed DEMP(s) and related construction controls and allow for corrective action to be taken where necessary.

5.1.2. As part of the monitoring process the designated Environmental Manager will be present onsite throughout the decommissioning phase and when new activities are commencing. The Environmental Manager will conduct weekly Site inspections, monthly compliance checks against the environmental management system including management plans and monitoring. They will also conduct a management system audit in line with the project management plan, engage with senior leadership in line with the project management plan and record assurance activities in line with the contractor's management system; including reporting and analysing data, trends and improvements to the management system.

5.1.3. The Principal Contractor will be informed of any deviations from the detailed DEMP(s) as soon as possible following identification of such issues, and if required further follow up will be sought. The Environmental Manager would also act as day-to-day contact with Local Planning Authority and other regulatory agencies such as the Environment Agency.

5.1.4. During decommissioning, the Environmental Manager will conduct walkover surveys to ensure all requirements of the detailed DEMP(s) are being met. Action from these surveys will be documents on an Environmental Action Schedule, discussed with the Site Manager for programming requirements and issued weekly for actioning.

5.1.5. The Environmental Manager will also arrange regular formal inspections and audits to ensure the requirements of the detailed DEMP(s) are being met. Details of monitoring, inspection and audits to be undertaken will be provided in the detailed DEMP(s).

5.1.6. After completion of the works, the Environmental Manager will conduct a final review.

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 Principal Contractor which will be certified in line with the ISO 14001 standards.

5.2.2. The Environmental Manager/Project Manager will retain records of all monitoring, inspections and audits and records related to environmental issues at the Site. 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 detailed DEMP(s) or complaints received from a third party.

5.2.3. The detailed DEMP(s) will be updated if it is necessary to add additional control measures, with a full review as required throughout the decommissioning period. Existing control measures and mitigation will not be amended without prior agreement with Local Planning Authority.

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:** CIRIA (2023) C811 Environmental good practice on site guide (fifth edition)
- **Ref. 3:** Regulation (EU) 2016/1628 of the European Parliament and of the Council. Available online: https://www.legislation.gov.uk/eur/2016/1628/article/4
- **Ref. 4:** The Wildlife and Countryside Act 1981 (as amended). Available online: https://www.legislation.gov.uk/ukpga/1981/69
- **Ref. 5:** Control of Pollution Act 1974. Available online: https://www.legislation.gov.uk/ukpga/1974/40
- **Ref. 6:** The British Horse Society (2024). Advice on Construction sites and horses. Available online: https://www.bhs.org.uk/media/kvbajook/construction-sites-0824.pdf

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