

Rosefield Solar Farm

Outline Biosecurity Management Plan

(Tracked)

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1. Introduction

1.1. Purpose of the Outline Biosecurity Management Plan

1.1.1. This Outline Biosecurity Management Plan (Outline BMP) has been prepared on behalf of Rosefield Energyfarm Limited (the Applicant) in relation to the application for a Development Consent Order for the construction, operation (including maintenance) and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').

~~1.1.1.~~ 1.1.2. This document has been updated at Deadline 7 to amend thresholds and procedures for pausing and restarting works. References to other application documents have not been updated from the original submission. Please refer to the **Guide to the Application [EN010158/APP/1.2.13]** for the list of current versions of documents.

~~1.1.2.~~ 1.1.3. The Outline BMP secures the essential biosecurity outcomes, minimum controls and governance arrangements for the Proposed Development and establishes the framework within which the detailed Biosecurity Management Plan must be prepared. The detailed Biosecurity Management Plan will be prepared following the grant of the DCO, after appointment of the Principal Contractor and before commencement of the relevant construction activities within the Biosecurity Area.

~~1.1.3.~~ 1.1.4. The detailed Biosecurity Management Plan will be submitted to and approved by the Secretary of State, as the discharging authority, pursuant to Requirement 20 of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.8]**. The detailed plan will be prepared substantially in accordance with this Outline BMP and following consultation with Preston Farms Limited and TCS Biosciences Limited (hereafter referred to as 'PFL/TCS'). As part of the application to discharge Requirement 20, the Applicant will provide the Secretary of State with a consultation log detailing the correspondence with PFL/TCS and a statement explaining how the reasonable comments of PFL/TCS have been taken into account.

~~1.1.4.~~ 1.1.5. The Proposed Development may be constructed in phases or parts. A single detailed Biosecurity Management Plan or phase-specific Plans may therefore be prepared, provided that the controls for every relevant construction phase and interface are consistent with this Outline BMP and collectively provide a coherent system of biosecurity management.

~~1.1.5.~~ 1.1.6. As secured in the oCTMP, oCEMP, oOEMP and oDEMP the construction, operation and decommissioning activities will be carried out in accordance with the approved detailed Biosecurity Management Plan.

1.2. Background

- 1.2.1. PFL/TCS have raised concerns regarding potential effects of the Proposed Development on the biosecurity of animals used in their specialist operations and the consequential impacts on their associated regulated business activities.
- 1.2.2. The Applicant recognises that PFL/TCS operate within a sensitive regulatory context. The measures within this Outline BMP are intended to prevent avoidable cross-contamination, control the interface between the Proposed Development and PFL/TCS operations, and provide for effective communication and incident response arrangements.

1.3. Scope

- 1.3.1. This Outline BMP applies to construction, operation (including maintenance) and decommissioning works and activities where they could create a relevant biosecurity interface with PFL/TCS. The maximum geographical extent within which such an interface may arise is the Biosecurity Area shown on the **Biosecurity Area Plan [EN010158/APP/2.7]**. The actual geographical extent of the relevant interface will be identified on the Biosecurity Interface and Zoning Plan and will include the defined access route and any other working area that directly interfaces with land occupied or used by PFL/TCS. Further details on this plan are set out in **Section 1.8** of this document.
- 1.3.2. The minimum contents for the detailed Biosecurity Management Plan are set out in **Appendix A** of this document.
- 1.3.3. The controls to be applied under the detailed Biosecurity Management Plan will be proportionate to the location of PFL/TCS animals and operations at the relevant time. Where alternative land is used by PFL/TCS, the detailed Biosecurity Management Plan will identify which controls remain necessary having regard to the resulting biosecurity interface.

1.4. Relevant interface with the Proposed Development

- 1.4.1. The primary interface with PFL/TCS arises from:
 - The construction and maintenance access serving Parcel 3;
 - Cable installation, Solar PV modules, landscaping and maintenance activities adjacent to land that will continue to be occupied or used by PFL/TCS; and
 - Any other authorised development or temporary working area that that will continue to directly interface with PFL/TCS land or operations, the extent of which will be set out in the detailed Biosecurity Management Plan.

1.5. Relationship with other management plans and objectives

- 1.5.1. General provisions relating to the environment and construction traffic are secured through the **Outline Construction Environmental Management Plan (Outline CEMP)** [EN010158/APP/7.2.6], **Outline Construction Traffic Management Plan (Outline CTMP)** [EN010158/APP/7.5.5], **Outline Operational Environmental Management Plan (Outline OEMP)** [EN010158/APP/7.3.6], and **Outline Decommissioning Environmental Management Plan (Outline DEMP)** [EN010158/APP/7.4.6].
- 1.5.2. The approved Biosecurity Management Plan will be the controlling document for biosecurity-specific requirements at the PFL/TCS interface. The corresponding detailed Construction Environmental Management Plan, Construction Traffic Management Plan, Operational Environmental Management Plan and Decommissioning Environmental Management Plan will implement the applicable requirements of the detailed Biosecurity Management Plan within their respective subject areas and will not introduce inconsistent or competing biosecurity controls.
- 1.5.3. The objectives of this outline Biosecurity Management Plan are to:
- Adequately reduce the risk of pathogens, contaminants or potentially harmful material being transferred between the Proposed Development and PFL/TCS;
 - Maintain a clear physical and operational separation between the works and activities forming part of the Proposed Development and PFL/TCS;
 - Coordinate access and construction activities so that animal movements and sensitive operations can take place safely;
 - Ensure that personnel understand the sensitivity of the interface and comply with role-specific controls;
 - Provide proportionate monitoring, audit, incident response and corrective-action procedures;
 - Provide an independent veterinary source of advice where specialist judgement is required;
 - Maintain adequate records to demonstrate compliance without disclosing unnecessary personal, confidential or security-sensitive information; and,
 - Support effective and timely communication between the Applicant and PFL/TCS.

1.6. Consultation and decision making

- 1.6.1. PFL/TCS will be consulted during the preparation of the detailed Biosecurity Management Plan. The Applicant must consider all comments and have regard to any relevant comments in the preparation of the detailed Biosecurity Management Plan. Responsibility for the content of the detailed Biosecurity Management Plan will remain with the Applicant and the approval process will be as specified in Requirement 20 of the **Draft DCO [EN010158/APP/3.1.8]**.
- 1.6.2. Where the parties materially disagree on a technical biosecurity issue requiring specialist veterinary judgement, the Applicant will seek advice from the Independent Veterinary Adviser (IVA), where appointed under **Section 1.7**, or otherwise obtain independent veterinary advice. The Applicant will consider the IVA's advice when preparing the detailed Biosecurity Management Plan.

1.7. Independent Veterinary Adviser

- 1.7.1. Where the construction programme provides for construction to take place adjacent to land that is concurrently being grazed by PFL/TCS livestock, the Applicant will appoint and fund an IVA sufficiently in advance of the relevant activities to review the applicable detailed arrangements and perform the functions identified in this Outline BMP. The IVA will be independent of the Applicant and PFL/TCS, have no conflict of interest, and be appointed following consultation with PFL/TCS.
- 1.7.2. The IVA will be a veterinary surgeon registered with the Royal College of Veterinary Surgeons and will have demonstrable qualifications and experience relevant to horses, sheep and cattle. Reasonable endeavours will be used to appoint an IVA also with relevant experience in regulated animal establishments or comparable high-biosecurity operations. The costs incurred by the IVA will be fully funded by the Applicant.
- 1.7.3. The IVA must not be the current Named Veterinary Surgeon (NVS) for PFL/TCS or otherwise have a conflict of interest that would compromise the independence of the appointment. The detailed Biosecurity Management Plan will establish an appropriate route for technical liaison between the IVA and the PFL/TCS NVS, subject to appropriate confidentiality arrangements and the consent of PFL/TCS. In addition, the Applicant will fund reasonable costs of the NVS to a capped amount during the construction period which the NVS incurs because of duties relating directly to the construction of the Proposed Development, where such duties are not already carried out by the IVA. This capped amount is to be determined in the detailed Biosecurity Management Plan.
- 1.7.4. The IVA's functions will include, where proportionate:

- Reviewing the proposed zoning, hygiene and crossing arrangements;
- Advising on role-specific induction content and enhanced controls during disease outbreaks;
- Monitoring animal welfare during periods when construction is undertaken adjacent to land grazed by PFL/TCS livestock at the same time, at a frequency determined by risk;
- Inspecting and auditing compliance with the detailed Biosecurity Management Plan, requiring access to relevant records, investigating incidents and escalating non-compliance;
- Advising on protective measures, remediation and investigation following an alleged animal welfare or biosecurity incident; and
- Providing a written opinion where there is a material technical disagreement between the parties.

1.7.5. Where a PFL/TCS animal is injured or is clearly **and significantly** distressed and there is a reasonable basis to consider that the works may be causing or contributing to the situation, the nearby affected construction activity will be made safe and, where necessary, paused while the Applicant implements the Biosecurity Incident Response Procedure set out in **Appendix C**. **The IVA will have the power to temporarily stop any works that they consider may be causing or contributing to the situation. This will not confer a general power on PFL/TCS, the NVS or the IVA to stop unrelated works. The IVA and NVS may raise and escalate animal welfare or biosecurity concerns, but neither PFL/TCS, the NVS nor the IVA will have a general power to stop unrelated construction works.** The detailed Biosecurity Management Plan will define the escalation and decision-making arrangements.

1.8. Biosecurity Interface and Zoning Plan

1.8.1. The detailed Biosecurity Management Plan will include a Biosecurity Interface and Zoning Plan for the relevant phase or part, confined within the Biosecurity Area shown on the **Biosecurity Area Plan [EN010158/APP/2.7]**, at an appropriate scale showing the Applicant Controlled Area, PFL/TCS Controlled Area, Biosecurity Interface Area and the location of any Biosecurity Control Point and Animal Crossing Point.

1.8.2. For the purposes of this Outline BMP:

- Biosecurity Area means the land shown on the **Biosecurity Area Plan [EN010158/APP/2.7]**;
- Applicant Controlled Area means land, an access route or a secured working corridor under the control of the Applicant or its contractors;

- PFL/TCS Controlled Area means land, premises or operational areas controlled by PFL/TCS;
- Biosecurity Interface Area means the geographical area within which development directly adjoins, crosses or otherwise interacts with PFL/TCS land or operations;
- Biosecurity Control Point means a defined location at which specified access, inspection, cleaning, disinfection, clothing, footwear, vehicle or equipment controls apply; and
- Animal Crossing Point means a defined and gated location at which animals under the control of PFL/TCS may cross an Applicant-controlled access route.

1.8.3. In addition to the above, the Biosecurity Interface and Zoning Plan will also show the following components as a minimum:

- Applicant's designated access route(s);
- Known movement corridors for PFL/TCS operations;
- Locations of the Applicant's other working corridors and construction/operation/decommissioning areas;
- Emergency access and assembly arrangements; and,
- Any areas where escorted access is required.

1.8.4. A Biosecurity Interface and Zoning Plan will be submitted for each of the construction, operation (including maintenance) and decommissioning phases. Where the Proposed Development is constructed, operated or decommissioned in parts, a Biosecurity Interface and Zoning Plan will be submitted for each relevant part before commencement of that part. Each Biosecurity Interface and Zoning Plan will be confined within the Biosecurity Area and will identify the locations where the relevant phase or part could create a biosecurity interface with PFL/TCS. The Biodiversity Management Plan relates only to land within the Biosecurity Area.

2. Construction Biosecurity Measures

2.1. Construction phasing and coordination

- 2.1.1. Construction activities will be planned to reduce avoidable interaction with PFL/TCS animals and operations, as far as reasonably practicable. The Applicant will act in the spirit of positive collaboration.
- 2.1.2. The Applicant will provide PFL/TCS with at least six months' advance notification of the location and timing of construction activities in proximity to PFL/TCS grazing land. The Applicant will also provide the best available information on the nature of those activities as early as reasonably practicable.
- 2.1.3. The Applicant will use reasonable endeavours to coordinate the timing of access and locally disruptive activities around pre-notified animal movements and sensitive operations, subject to safety, statutory requirements and reasonable construction and logistics constraints.
- 2.1.4. The detailed Biosecurity Management Plan will set minimum notice periods for planned animal movements and sensitive operations. The required notice period will vary dependent on the nature of the activity, with longer notice required where major deliveries or fixed logistics would need to be rescheduled. Should PFL/TCS not adhere to the minimum notice periods set out in the detailed Biosecurity Management Plan, there will be no requirement for the Applicant to facilitate crossing movements where it would otherwise materially impact construction activity.

2.2. Physical separation

- 2.2.1. Prior to commencement of all other construction activity within the relevant parts of the construction site, the access route established during construction and intended to be retained for operational use will be clearly defined and physically separated from adjoining PFL/TCS land by double fencing and secure gates. Hoarding will also be provided where reasonably requested by PFL/TCS and identified in the detailed Biosecurity Management Plan as necessary and proportionate having regard to worker safety, biosecurity, dust and airborne-material risk. The detailed Biosecurity Management Plan will prescribe any additional exclusion gap or other measure required.
- 2.2.2. Boundaries at the interface will be inspected by a competent person at a frequency set out in the detailed Biosecurity Management Plan and after any event likely to have caused damage. Defects capable of allowing animal entry or uncontrolled access will be made safe without delay.

2.3. Access control and permitted areas

- 2.3.1. Access to relevant construction areas will be limited to named persons who have completed the PFL/TCS-specific induction or role-specific briefing and are authorised by the Applicant or Principal Contractor for the areas relevant to their role.
- 2.3.2. The access system will include, as applicable:
- Controlled construction entrance, with gates and banksman control at the Parcel 3 access from Granborough Road and at any Animal Crossing Point during construction;
 - Booking or pre-notification of planned deliveries;
 - Live sign-in and sign-out or electronic access register recording name, employer, role, induction status, arrival and departure time, vehicle registration, route used and purpose of access;
 - Photo identification checks and confirmation of induction or role-specific briefing;
 - Time-limited photo passes and hard-hat stickers, or an equivalent visible system, identifying the holder and the areas they are permitted to access;
 - Restriction of each person, vehicle, plant item and item of equipment to the defined permitted route and area; and
 - Refusal or withdrawal of access where mandatory controls, to be agreed in the detailed Biosecurity Management Plan, are not met.
- 2.3.3. Induction and briefing requirements will be proportionate to the role and the area to be accessed.
- 2.3.4. The detailed Biosecurity Management Plan will identify the contractor role responsible for authorising and recording access, and the circumstances in which relevant information is shared with PFL/TCS.
- 2.3.5. During construction, completion of the relevant induction in advance of the first visit and signing on each visit will be sufficient. Separate pre-authorisation of each construction visit will not be required unless the relevant underlying training requirements change.

2.4. Escorted access

- 2.4.1. All personnel will have successfully completed a biosecurity induction or role-specific biosecurity briefing appropriate to their role before accessing the Biosecurity Interface Area or any Applicant Controlled Area to which the detailed Biosecurity Management Plan applies.

2.4.2. Personnel will not require an escort while travelling or working within the defined access route or another established and secured Applicant Controlled Area.

2.4.3. Escorted access will be required in the following circumstances:

- during preliminary site-establishment works, including installation of fencing along the access route, until the permanent physical separation measures are complete; and
- where, due to extenuating circumstances, personnel need to enter external land controlled by PFL/TCS outside the defined and physically separated access route.

2.4.4. Escorted access under paragraph 2.4.3 will be requested in advance, except in an emergency where delay would create a greater risk. The detailed Biosecurity Management Plan will establish the associated supervision and hygiene arrangements.

2.4.5. For the avoidance of doubt, the Applicant's personnel will not access PFL/TCS internal operational areas, buildings, yards, stables, animal enclosures, feed areas, handling areas or other internal facilities.

2.5. Induction, training and conduct

2.5.1. Before allowing workers or visitors into the relevant parts of the Site, the Applicant or Principal Contractor will deliver a PFL/TCS-specific, role-based biosecurity induction. Key personnel responsible for delivering the induction will initially be trained directly by PFL/TCS, with the costs of that training met by the Applicant. The Applicant or Principal Contractor will incorporate the relevant content into the inductions and role-specific briefings delivered to other personnel. The minimum requirements are set out in **Appendix D**.

2.5.2. The induction will explain, insofar as relevant to the role and work being undertaken, the context of PFL/TCS's Home Office-licence and the Animals (Scientific Procedures) Act 1986, the role of the NVS, animal welfare oversight and the Animal Welfare and Ethical Review Body, the sensitivity of donor animals, biosecurity risks, prohibited conduct, reporting obligations and the consequences of non-compliance, without requiring disclosure of unnecessary confidential information.

2.5.3. Training will be separately recorded, refreshed at appropriate intervals and repeated for replacement personnel, subcontractors, delivery drivers, plant operators and other relevant workers. The relevant Risk Assessment and Method Statement (RAMS) will be developed following consultation with PFL/TCS and secured through the detailed Construction Environmental Management Plan. All personnel to whom the relevant RAMS apply will

sign them at regular intervals under arrangements managed by the Health and Safety Manager. Additional toolbox talks will be provided before high-interface activities, after material changes to protocols, following a relevant incident and during periods of enhanced disease control.

- 2.5.4. Visitors, delivery drivers and short-duration personnel will receive a concise briefing or written instruction tailored to their activities.
- 2.5.5. For escorted access onto external land controlled by PFL/TCS, the Applicant will seek to agree the scope of any enhanced training with PFL/TCS. Where agreement is not possible, the Applicant will determine the appropriate scope after taking account of advice from the NVS, where available, and from the IVA where appointed or other independent veterinary advice where specialist veterinary judgement is required.
- 2.5.6. Final responsibility for delivering the induction remains with the Applicant and/or Principal Contractor.
- 2.5.7. Prohibited conduct will include, as a minimum:
- Contact with, feeding of or attempted handling of PFL/TCS animals;
 - Entry into animal enclosures or interference with farm equipment, fencing or gates;
 - Photography, filming, drone use or mobile-phone recording on or overlooking PFL/TCS operational areas, except where permitted in accordance with the detailed Biosecurity Management Plan; and,
 - Access outside the individual's defined permitted area or route.
- 2.5.8. Photography, filming or drone use required for legitimate project progress, quality, safety or regulatory purposes will be subject to prior agreement with PFL/TCS where it could capture PFL/TCS operational areas, and access to the resulting footage will be restricted.

2.6. Workforce screening, confidentiality and conduct

- 2.6.1. Identity, right-to-work status and competence checks form part of the Applicant's standard process for engaging personnel and will be completed before personnel access the Site. The detailed Biosecurity Management Plan will identify any additional lawful, proportionate and role-based security controls required for access to the relevant areas.
- 2.6.2. Personnel will be subject to contractual confidentiality and site-conduct requirements. The Applicant and its subcontractors will enter into additional confidentiality arrangements or Non-Disclosure Agreements (NDAs) where reasonable for persons who will be privy to confidential information beyond the public domain. Individual NDAs will not otherwise be required for all construction or operational personnel.

2.7. Personnel hygiene and protective clothing

- 2.7.1. The detailed Biosecurity Management Plan will specify the footwear, clothing and hygiene controls required for the relevant areas. These controls will include boot disinfection, on-site storage of designated boots, spot checks and refusal of access where mandatory standards are not met. Any additional measures will be selected having regard to the relevant activity, worker safety and practical Site conditions and may include boot brushes, boot washing, foot dips or other equivalent controls.
- 2.7.2. Personnel who do not comply with a mandatory hygiene control will not pass beyond the relevant Biosecurity Control Point or enter the area to which that control applies until the deficiency has been corrected.
- 2.7.3. Designated boots and any other clothing or PPE identified by the detailed Biosecurity Management Plan will be stored on-Site and segregated as necessary to prevent cross-contamination. Clean clothing will be required following any unauthorised deviation from the defined access route. Used disposable items and contaminated cleaning materials will be contained and disposed of in accordance with the detailed Biosecurity Management Plan.
- 2.7.4. Personnel accessing areas adjacent to PFL/TCS land will be required to report recent contact with livestock, visits to livestock premises, known disease restrictions, contamination events or other matters that may materially affect biosecurity.

2.8. Vehicles, plant and equipment

- 2.8.1. Vehicles accessing Parcel 3 will use a disinfectant wheel dip where reasonably practicable. Where use of a wheel dip is not reasonably practicable, the wheels and wheel arches will instead be sprayed with a disinfectant in accordance with a site-specific method that seeks to contain spray and runoff. Disinfectant will apply on entry only and will not be required when a vehicle exits a Biosecurity Control Point.
- 2.8.2. Where an Animal Crossing Point is required or retained, disinfectant wheel dips will be provided and maintained on both sides of the crossing where reasonably practicable. Where a wheel dip is not reasonably practicable, the alternative wheel and wheel-arch disinfection method in paragraph 2.8.1 will apply. The detailed Biosecurity Management Plan will specify the disinfectant procedure and wash-water or runoff-containment arrangements. Disinfectant will apply before entry to an Animal Crossing Point only and will not be required when a vehicle exits an Animal Crossing Point.
- 2.8.3. Routine and enhanced controls may include:

- Cleaning at locations identified in the detailed Biosecurity Management Plan;
- Targeted cleaning or disinfection before movement through another Biosecurity Control Point;
- Cleaning of plant before first entry and before return after use on another livestock premises;
- Retention of plant within the relevant Applicant Controlled Area where reasonably practicable; and
- Refusal of access where mandatory standards are not met.

2.8.4. The detailed Biosecurity Management Plan will define the cleaning or disinfection methods, triggers and locations needed to achieve the required outcome. It will also specify arrangements for facility maintenance, wash-water containment and disposal of contaminated material.

2.9. Dust and other airborne material

2.9.1. The access route will be maintained to prevent the avoidable accumulation and transfer of mud, dust and debris.

2.9.2. Dust suppression will be used where required by weather, surface condition or the proximity of animals. Water or another suitable suppressing method will be applied in a manner that does not create contaminated runoff.

2.9.3. The detailed Biosecurity Management Plan will identify whether solid hoarding or additional screening is necessary at any particular location, based on the biosecurity risk from dust or other airborne material, in consultation with PFL/TCS.

2.10. Animal crossing procedure

2.10.1. Where an Animal Crossing Point is required across an Applicant Controlled Area, it will be managed in accordance with a Site-specific animal crossing procedure addressing the minimum requirements set out in **Appendix B**.

2.11. Animal welfare and sensitive activities

2.11.1. Works and vehicle movements in the vicinity of the animals will be paused during pre-notified animal movements to and from donor sessions and during other sensitive events whose timings have been agreed in advance through the weekly interface meetings. PFL/TCS will not have a general or unilateral power to impose wider works blackout periods. However, the Applicant will grant any reasonable requests for pauses due to unexpected

events in instances where pre-notification was not possible. Coordination will be undertaken through the liaison arrangements in **Section 6.1**.

2.11.2. Baseline noise monitoring and mitigation for identified effects will be addressed through the detailed Construction Environmental Management Plan, detailed Operational Environmental Management Plan and detailed Decommissioning Environmental Management Plan, as applicable to the relevant activity or phase, following consultation with PFL/TCS. Any additional trigger levels, action levels or behavioural-response triggers will be considered in light of the thresholds proposed, the applicable assessments and the location of PFL/TCS animals, including any use of temporary alternative grazing land. The detailed Biosecurity Management Plan will identify any additional measures required specifically in the interests of biosecurity.

2.11.3. If a PFL/TCS animal is injured or is clearly and significantly distressed and there is a reasonable basis to consider that the works may be causing or contributing to the situation, nearby affected works will be made safe and, where necessary, paused and the incident procedure will be followed. The IVA will have the power to temporarily stop any works that they consider could be causing or contributing to the situation. This will not confer a general power on PFL/TCS, the NVS or the IVA to stop unrelated works.

2.12. Disease outbreaks and enhanced controls

2.12.1. The detailed Biosecurity Management Plan will include an enhanced protocol for a suspected or confirmed notifiable animal disease, an official restriction on animal movement or another material change in local animal disease risk.

2.12.2. The protocol will identify the source(s) of authoritative advice and measures that may be introduced, which may include restricted access, additional cleaning and disinfection, suspension of non-essential interface activities and additional records.

2.13. Emergency access

2.13.1. Emergency access will not be delayed by a requirement for routine escort or pre-authorisation where delay would create a substantial risk to people or critical infrastructure. The person directing the emergency response will implement the practicable hygiene controls available at the time and notify PFL/TCS as soon as reasonably practicable.

2.13.2. Following emergency access, the affected route will be cleaned or disinfected where required, and the event recorded.

3. Operational Biosecurity Measures

3.1. Operational controls

- 3.1.1. Operational activities will be planned to reduce avoidable interaction with PFL/TCS animals and operations, as far as reasonably practicable. The Applicant will act in the spirit of positive collaboration.
- 3.1.2. Prior to commencement of operation of the relevant part of the Proposed Development, the detailed Operational Environmental Management Plan will set out the applicable operational biosecurity controls. Those controls will be prepared in accordance with this Outline BMP and following consultation with PFL/TCS.
- 3.1.3. Operational access will be substantially less frequent than construction access. The operational procedures will include pre-arranged access by authorised personnel, locked gates with keyed or equivalent controlled access, photo identification or access verification, a live access record, visible time-limited permissions and restriction to permitted areas.
- 3.1.4. Personnel will remain within the separate operational access area. Where access to the cable route outside that area is necessary for maintenance, escorted access and the applicable hygiene procedures will apply, except in an emergency. Rosefield personnel will not access PFL/TCS internal operational areas or facilities.
- 3.1.5. Routine maintenance personnel will receive a role-specific briefing. Higher-risk works, including cable repair, replacement of major equipment or works involving a substantial increase in vehicle or plant activity, will be managed as a temporary construction-type activity with proportionate controls developed following consultation with PFL/TCS. The controls will reflect the relevant area and activity and the actual biosecurity interface at the time.
- 3.1.6. Any Animal Crossing Point retained during operation will be kept secure and operated in accordance with an operational crossing procedure applying the relevant minimum requirements in Appendix B and based on reasonable advance notification. Planned maintenance that conflicts with a notified animal movement will be coordinated through advance liaison where reasonably practicable. The wheel-disinfection controls in paragraphs 2.8.1 and 2.8.2 will continue to apply during operation.
- 3.1.7. The no-contact, photography, confidentiality, incident-reporting and disease-related controls will continue to apply during operation.
- 3.1.8. The operational biosecurity controls within the detailed Operational Environmental Management Plan will be reviewed in accordance with

Section 6.3 after any material change in the access arrangement, PFL/TCS land use, disease risk or operational activity at the interface.

4. Decommissioning Biosecurity Measures

4.1. Decommissioning controls

- 4.1.1. Decommissioning activities will be planned to reduce avoidable interaction with PFL/TCS animals and operations, as far as reasonably practicable. The Applicant will act in the spirit of positive collaboration.
- 4.1.2. Prior to commencement of decommissioning of the relevant phase or part of the Proposed Development, the detailed Decommissioning Environmental Management Plan will set out the applicable decommissioning biosecurity controls. Those controls will be prepared having regard to the construction and operational controls, the decommissioning activities and the biosecurity interface existing at that time, and following consultation with PFL/TCS.
- 4.1.3. The decommissioning biosecurity controls within the detailed Decommissioning Environmental Management Plan will apply the construction controls as a starting point and will identify any revisions required by the decommissioning activities and the biosecurity interface existing at that time.

5. Monitoring and corrective action

5.1. Inspection and monitoring

- 5.1.1. The detailed Biosecurity Management Plan will include an inspection and monitoring procedure proportionate to the risk.
- 5.1.2. Inspections will include routine checks, plus additional checks before animal crossings, following severe weather, after damage to a relevant boundary, during enhanced disease controls and after a relevant complaint or incident.
- 5.1.3. During periods when construction is undertaken adjacent to concurrently grazed PFL/TCS land, the IVA may inspect and audit compliance, require access to relevant records, investigate incidents and escalate non-compliance at a frequency determined by risk. The Applicant will record its response to any material recommendation.

5.2. Non-compliance

- 5.2.1. Failure to comply with the detailed Biosecurity Management Plan will be acted upon, reported promptly to the Applicant and PFL/TCS where it affects or could affect the PFL/TCS interface, and recorded. Responses will include immediate correction, retraining and, for serious or repeated breaches, removal from the Site. Any breach of the Applicant's applicable RAMS by PFL/TCS personnel using an Applicant-controlled route or Animal Crossing Point will similarly be reported to the Applicant and addressed through the liaison arrangements.
- 5.2.2. A serious breach is one that creates a credible risk of cross-contamination, animal escape, injury or significant interference with PFL/TCS operations.

5.3. Incident response

- 5.3.1. The detailed Biosecurity Management Plan will include a site-specific Biosecurity Incident Response Procedure addressing the incident categories and minimum procedural requirements set out in **Appendix C**.
- 5.3.2. The immediate response will prioritise safety, containment and prevention of further harm. Relevant work will be made safe, and the affected activity will be paused where necessary. PFL/TCS will be notified and evidence will be preserved.
- 5.3.3. A localised pause in activity will not require suspension of unrelated works. A wider suspension will occur only where the evidence indicates that the risk is not confined to the affected activity or area.

- 5.3.4. Serious incidents will be notified immediately through the agreed emergency contacts. Other concerns will be acknowledged, recorded and responded to within a timescale proportionate to their nature and urgency and to be defined in the detailed Biosecurity Management Plan.

5.4. Investigation and restart

- 5.4.1. Any biosecurity investigation will be led by the Applicant and will involve the IVA where appointed and relevant. Where no IVA has been appointed, the Applicant will obtain other independent veterinary advice where specialist veterinary judgement is required.
- 5.4.2. Where relevant works have been paused, they will not restart until the immediate risk has been controlled and both the Applicant's responsible manager and the IVA, where appointed, or other independent veterinary advisor -are satisfied that reasonable corrective measures have been implemented. ~~Where specialist veterinary judgement is required, the Applicant will obtain and take account of advice from the IVA, where appointed, or other independent veterinary advice before restart.~~ PFL/TCS will be informed of the corrective measures and may take advice from its NVS as it considers appropriate, but neither PFL/TCS nor the ~~IVA~~ NVS will have a general veto over restart.
- 5.4.3. The detailed Biosecurity Management Plan will include a procedure for investigating an alleged material adverse effect on animal product quality or continuity. The procedure will provide for urgent liaison with PFL/TCS, review of relevant baseline information, timing, location, monitoring and compliance records, potential alternative causes and advice from the IVA where required. Remediation measures will be developed in consultation with PFL/TCS where appropriate. Evidence of a direct link between the activities forming part of the Proposed Development and the alleged impact will be required before the impact is attributed to the Proposed Development. A precautionary pause will be applied only where there is credible evidence of an immediate and continuing risk from the affected activity.

6. Liaison, Records and Review

6.1. Liaison arrangements

- 6.1.1. The Applicant will identify a principal and out-of-hours contact for PFL/TCS. PFL/TCS will be requested to identify equivalent contacts.
- 6.1.2. During the construction phase, the Applicant will hold weekly liaison meetings with PFL/TCS, unless a different frequency is agreed, for example because works are remote or inactive. Meetings will discuss the interface, relevant protocols and any potential impacts identified, and will typically address:
- The short-term construction programme and progress;
 - Planned vehicle movements, deliveries and traffic management;
 - Animal movements and any pre-notified sensitive activities;
 - Crossing requirements and gate arrangements;
 - Biosecurity controls, inspections and changes in disease risk; and
 - Complaints, incidents, non-compliances and corrective actions.
- 6.1.3. The frequency may be increased following an incident or during particularly sensitive works and reduced when minimal material interface exists. Frequency of liaison during the operational and decommissioning phases will be set out in the detailed Biosecurity Management Plan.

6.2. Records

- 6.2.1. The Applicant will maintain records sufficient to demonstrate implementation of the detailed Biosecurity Management Plan.
- 6.2.2. Records relevant to a legitimate and clearly justified PFL/TCS concern will be made available on reasonable request by PFL/TCS so far as legally possible. Personal data, security information and unrelated commercially sensitive information may be withheld or redacted, and appropriate confidentiality arrangements, including an NDA where necessary, may be required before disclosure.

6.3. Review and change control

- 6.3.1. The Applicant will keep the detailed Biosecurity Management Plan and the phase-specific biosecurity controls under review throughout the relevant phases of the Proposed Development.
- 6.3.2. The detailed Biosecurity Management Plan will be reviewed:

- Following an incident that requires the Biodiversity Incident Response Procedure to be implemented, or if there is repeated non-compliance;
- Following a suspected or confirmed notifiable animal-disease event;
- Where there is a material change to the construction programme, access route, Animal Crossing Point, PFL/TCS land use or location of animals;
- Where the IVA makes a material recommendation;
- Before commencement of a materially different phase or activity at the interface; and
- At any other time where the Applicant considers, or PFL/TCS has raised reasonable grounds to consider, that the controls may no longer be effective or proportionate.

6.3.3. Any material amendment to the detailed Biosecurity Management Plan or the phase-specific biosecurity controls will be prepared following consultation with PFL/TCS and submitted for approval pursuant to Requirement 3 of the **Draft DCO [EN010158/APP/3.1.8]**, where required. No amendment may reduce the level of biosecurity protection secured by this Outline BMP, unless supported by appropriate justification and approved through the applicable process.

Appendix A: Minimum contents of the BMP

The BMP will include, as a minimum:

- Biosecurity Interface and Zoning Plan, defined access route, Biosecurity Control Points, any Animal Crossing Point and area-specific biosecurity procedures;
- Roles, named contacts, deputies and 24-hour emergency contact arrangements;
- IVA terms of reference, where appointment of an IVA is required under section 1.7;
- Liaison arrangements;
- Double-fencing, boundary, gate, banksman and security details;
- Named-person access procedures, visible time-limited passes and the live access register;
- PFL/TCS-specific training, induction, toolbox-talk and RAMS arrangements;
- Personnel declarations, clothing, footwear, boot-storage and hygiene controls;
- Location, specification and maintenance of any hygiene facility required;
- Cleaning and disinfection methods;
- Vehicle, plant and equipment controls, including the wheel-disinfection arrangements required by paragraphs 2.8.1 and 2.8.2 of the Outline BMP;
- Wash-water, contaminated material and waste arrangements;
- Animal crossing procedure;
- Photography, filming, drone and confidentiality controls;
- Disease outbreak and enhanced-control procedure;
- Monitoring, inspection, audit and record-keeping requirements;
- Incident response, investigation, corrective action and restart procedure; and,
- Complaints and communication procedure.

Appendix B: Minimum requirements for the animal crossing procedure

Where an Animal Crossing Point is required, the BMP will, as a minimum, include a site-specific crossing procedure addressing the matters below:

- Notification and coordination: Contact details, notice periods, acknowledgement method and crossing window.
- Crossing preparation: cleaning and inspection method and the operation of the wheel-disinfection arrangements required by paragraphs 2.8.1 and 2.8.2 on both sides of the crossing.
- Traffic and works control: holding points, banksman supervision, gate control and plant safe-state requirements.
- Security monitoring: consideration of a security camera where reasonably requested by PFL/TCS and where appropriate having regard to privacy, data-protection and operational requirements.
- Animal movement: crossing handover protocol and coordination between the people responsible for the animal movement and the crossing point.
- Gate and security management: gate sequence, authorised persons and arrangements outside crossing periods.
- Completion and reopening: reopening authority and post-crossing checklist.
- Emergency or unplanned movement: emergency contacts, immediate actions and escalation protocol.
- Records and incidents: record format, retention period and reporting thresholds.

Appendix C: Minimum requirements for the Biosecurity Incident Response Procedure

The detailed Biosecurity Management Plan will include a site-specific Biosecurity Incident Response Procedure applying, as a minimum, to:

- a suspected contamination or biosecurity breach;
- unauthorised access or departure from a designated route;
- damage to a fence, gate or Animal Crossing Point;
- an animal entering an Applicant Controlled Area or a vehicle-animal conflict;
- an injured or significantly clearly distressed animal where the works may be causing or contributing to the situation;
- a suspected disease-control breach;
- unauthorised photography, filming, drone use or recording;
- a hygiene failure, vehicle contamination or material transfer of mud or dust;
- a relevant near miss or worker non-compliance; and
- an alleged effect on animal product quality.

The BMP will include a site-specific incident procedure addressing the measures set out below.

- Immediate safety and containment: incident categories, initial actions and criteria for making the affected activity safe or pausing it.
- Notification: contact details, notification timescales and out-of-hours arrangements.
- Specialist and regulatory advice: referral triggers and responsible person.
- Evidence and investigation: investigation method, evidence requirements and report format.
- Corrective and preventative action: action ownership, timescales and verification.
- Restart: restart criteria, decision-making by the Applicant's responsible manager and the role of the IVA, where appointed, or other independent veterinary advice where specialist veterinary judgement is required.
- Reporting and learning: reporting, record retention, distribution and review triggers.

Appendix D: Minimum induction syllabus

The BMP will include an induction syllabus addressing the measures set out below, as a minimum:

- The context of the Home Office licence and Animals (Scientific Procedures) Act 1986, the role of the NVS, animal welfare oversight, the Animal Welfare and Ethical Review Body and the sensitivity of donor animals, insofar as relevant to the role.
- The limits of the construction, operational or decommissioning corridor and permitted areas.
- Explanation of the Applicant Controlled Area, PFL/TCS Controlled Area, Biosecurity Interface Area, Biosecurity Control Points and any Animal Crossing Point relevant to the individual's role.
- No contact or interaction with PFL/TCS animals and no movement across gates, fencing or boundaries between an Applicant Controlled Area and a PFL/TCS Controlled Area except where authorised and the required biosecurity controls have been implemented.
- Clothing, footwear, vehicle and equipment controls.
- Animal crossing and traffic-pause arrangements.
- Photography, filming, drone and confidentiality restrictions.
- What to do if a PFL/TCS animal enters the work area or appears injured or distressed.
- How to report a breach, incident, damaged gate or other concern.
- Prohibited conduct.
- Consequences of non-compliance.
- Changes or enhanced controls during a disease outbreak.

Role-specific briefings will extract only the content relevant to delivery drivers, visitors or other short-duration personnel.

The recording, refreshing and repetition of training, the signing of applicable RAMS and the provision of additional toolbox talks will be undertaken in accordance with paragraph 2.5.3 of this Outline BMP.



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