



# EAST PARK ENERGY

**East Park Energy**

EN010141

## **Preliminary Environmental Information Report Volume 2 – Technical Appendices**

**Appendix 2-4: Outline Operational Environmental  
Management Plan**

**September 2024**

Version 01

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### **Appendix 2-4: Outline Operational Environmental Management Plan**

<b>Version</b>	<b>Date</b>	<b>Status</b>
01	September 2024	PEIR

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## 1.0 INTRODUCTION

### 1.1 Background

- 1.1.1 This outline Operational Environmental Management Plan (oOEMP) has been prepared for the Operational Phase of the East Park Energy project (hereafter referred to as ‘the Scheme’).
- 1.1.2 The Scheme is classified as a Nationally Significant Infrastructure Project (NSIP) and therefore BSSL Cambsbed 1 Ltd (‘the Applicant’) is applying for a Development Consent Order (DCO) to construct, operate and ultimately decommission the Scheme. The Scheme is considered to be ‘EIA development’ as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’)<sup>1</sup>, requiring an Environmental Impact Assessment (‘EIA’).
- 1.1.3 As per Preliminary Environmental Information Report (PEIR) Chapter 2, the operational life of the Scheme is anticipated to be 40 years. Once the operational life of the Scheme ends it will be decommissioned. If the DCO is granted, prior to the final commissioning of the Scheme this oOEMP will be developed into a detailed Operational Environmental Management Plan (OEMP). The OEMP will be in substantial accordance with this oOEMP, and will be a requirement of the DCO for submission and approval by the Local Planning Authorities (LPA) prior to final commissioning.
- 1.1.4 The purpose of this oOEMP is to set out how the necessary environmental mitigation and monitoring identified as part of the EIA and set out in the PEIR will be delivered during the operation of the Scheme, and ensure that this mitigation is secured and embedded into that activity.
- 1.1.5 This oOEMP is concerned with the Operational Phase of the Scheme, the following documents cover the separate construction and decommissioning phases:

- **Construction Phase** – outline Construction Environmental Management Plan (oCEMP) – *PEIR Volume 2 Appendix 2-3*; and
- **Decommissioning Phase** – outline Decommissioning Environmental Management Plan (oDEMP) – *PEIR Volume 2 Appendix 2-5*.

## 1.2 Document Structure

1.2.1 This oOEMP is structured as follows:

- **Introduction** – provides an introduction to the document and defines the structure of the oOEMP;
- **Scheme Description** – provides a summary of the Site and Site Context, a description of the Scheme, and sets out a summary of the expected decommissioning activities;
- **Roles & Responsibilities** – sets out the roles & responsibilities that will need to be defined at the Operational Phase, and identifies stakeholders relevant to the environmental management of the Operational Phase;
- **Operational Environmental Management** – sets out principles and site rules to be applied in the operation of the Scheme, and how communication with third parties will be undertaken during operation;
- **Environmental Mitigation Measures** – sets out the environmental management and mitigation measures that are required to address the effects of the Scheme during the Operational Phase, as relied on or identified in the PEIR;
- **Implementation of Management Plan** – provides a summary of the key requirements that must be within the final OEMP to ensure successful implementation of this oOEMP; and
- **Monitoring and Maintenance** – sets out the procedures for monitoring and ensuring compliance with the OEMP, as well as requirements for record keeping.

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## 2.0 SCHEME DESCRIPTION

### 2.1 The Scheme

- 2.1.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site BESS on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation. The Scheme is located in the East of England.
- 2.1.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity to the National Grid, as well as the storage of up to 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design.
- 2.1.3 A more detailed description of the Scheme is provided within ***PEIR Volume 1 Chapter 2***.

### 2.2 The Site

- 2.2.1 The Site is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council and Huntingdonshire District Council. The site location is shown on ***PEIR Volume 3 Figure 1-1***.
- 2.2.2 The Site area extends to approximately 769 hectares (ha) and is hereafter referred to as the 'Scheme Boundary'. The Scheme Boundary includes all land for the solar development, battery energy storage system (BESS), landscaping, cabling, access and grid connection.
- 2.2.3 With reference to ***PEIR Volume 3 Figure 1-2***, for ease of reference the Scheme Boundary has been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Scheme Boundary also covers land outside of East Park Sites A to D

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which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

2.2.4 With reference to **PEIR Volume 3 Figure 1-2**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **PEIR Volume 3 Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and arable fields.

- **Cable Corridor – Site D to Eaton Socon Substation** – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

## 2.3 Site Context

- 2.3.1 Settlement surrounding the Scheme Boundary comprises a number of villages, including Pertenhall and Great Staughton to the north, Little Staughton and Keysoe to the south, Swineshead to the west, and Hail Weston to the east.
- 2.3.2 Neither the Scheme Boundary nor the immediate surrounding area is covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The closest statutory landscape designation to the Scheme Boundary is the Chilterns National Landscape located approximately 30 km to the south. The Scheme Boundary is also not within any locally designated (non-statutory) landscapes.
- 2.3.3 There are no statutory nature conservation designations within the Scheme Boundary. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. Perry Woods SSSI is located circa 1.8 km north of the Scheme Boundary and Grafham Water SSSI is located circa 2.8 km north. The closest ‘European site’ (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Scheme Boundary, to the north-west.
- 2.3.4 The following non-statutory nature conservation designations are in close proximity to the Site:
- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
  - Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.



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- 2.3.5 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of this environmental assessment of the Scheme has discovered the probable site of a Roman Town in Site C. Due to the likely national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a Scheduled Monument. The application was accepted and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **PEIR Volume 3 Figure 1-3**.
- 2.3.6 There are no other statutory designated heritage assets within the Site. There are a number of listed buildings located within the vicinity of the Site, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. Of particular note this includes the Grade I listed Church of St Peter in Pertenhall; the Grade I listed Church of St Mary the Virgin in Keysoe; the Grade I listed Church of All Saints to the east of Little Staughton; and the Grade I listed Church of St Andrew at Great Staughton. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary.
- 2.3.7 The Site is not covered by any conservation areas, with the closest being the Great Staughton Conservation Area, located circa 200 m north of East Park Site C; Swineshead Conservation Area, located circa 750 m west of East Park Site A; and Riseley Conservation Area, located circa 1.2 km south-west of East Park Site A.

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2.3.8 The Site is located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west through Site A, with an unnamed watercourse through Site B, and with the River Kym to the north of Site C. The Site is crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

## 2.4 Operational Activities

2.4.1 Subject to the Scheme securing a Development Consent Order it is anticipated that the Operational Phase would start no earlier than 2029 (following the completion of construction). The Scheme would then operate for approximately 40 years, with decommissioning assumed to be no earlier than 2069.

2.4.2 Activity within the Scheme during the Operational Phase will be limited, and will principally involve equipment maintenance and servicing, replacement and renewal of any components that fail, monitoring, and vegetation & landscape management. For the latter, this would be in line with the outline Landscape and Ecological Management Plan (oLEMP) available in **PEIR Volume 2 Appendix 2-2**. The maintenance and servicing activity is expected to comprise inspection of equipment, servicing, removal, replacement, and reconstruction or refurbishing of faulty equipment to ensure effective operation of overall Scheme.

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

2.4.4 The on-site substation (set within the Scheme) will be managed and maintained by the operator of the site. Eaton Socon Substation will be managed and maintained by National Grid.

2.4.5 During the Operational Phase it is estimated that there would be a total of 20 Full Time Equivalent (FTE) staff on Site, which would comprise 12 in site maintenance, 5 management and administration, and 3 in land management roles.

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## 3.0 ROLES & RESPONSIBILITIES

### 3.1 Site Team

3.1.1 The following are key Site roles during the Operational Phase that would have responsibility for management of environmental impacts, with responsibilities for each role are also set out (this list is not definitive and additional roles & responsibilities may be added to the final OEMP):

- **Site Manager** – The Scheme Owner/Operator will identify a Site Manager who will have overall responsibility for implementation of the OEMP and all other DCO and legislative requirements.
- **Quality Manager** – The Quality Manager will have responsibility for quality assurance and compliance, document management and record keeping, inspections for quality control, management of risks, and process improvement related to quality control and assurance. For the OEMP they would have responsibility for quality assurance of procedures and for management of documentation, records, and monitoring of the systems relating to the same.
- **Health and Safety Manager** – responsible for the monitoring and control of health and safety, and rules and regulations arising.
- **Environmental Manager** – The Environmental Manager has responsibility for management of environmental matters related to the Operational Phase of the Scheme, including ensuring compliance with legislation, ensuring that mitigation, management and monitoring measures are implemented, and that best practice is applied during works. The Environmental Manager will be a point of contact with environmental bodies and other third parties as required to perform their duties.
- **Environmental Clerk of Works** – The Environmental Clerk of Works (ECoW) will be a suitably qualified environmental manager responsible for on-site management and monitoring of environmental impacts including for soil management, pollution control, noise and dust monitoring, and surface water.

- **Ecological Clerk of Works** – The Ecological Clerk of Works (EcoCoW) will be a suitably qualified ecologist responsible for on-site managing and monitoring of the works in relation to habitats, protected species, and other wildlife.
- **Flood Warden** – The Flood Warden will be responsible for preparation, management, and response to flood incidents, inclusive of reacting to flood warnings and alerts.
- **Community Liaison Officer** – The Community Liaison Officer will ensure that the Community Liaison Group (CLG) is established and will be the point of contact for the CLG, ensuring that regular updates are issued during the operation of the Scheme.

3.1.2 These roles and responsibilities are indicative and will be confirmed in the final OEMP.

## 3.2 Stakeholders

### Community Liaison Group

- 3.2.1 A Community Liaison Group (CLG) will be formed prior to construction (per the oCEMP) and will continue through its operations until ultimate decommissioning of the Scheme.
- 3.2.2 During the Operational Phase, the purpose of the CLG will be to allow interested community members and bodies to be regularly updated on maintenance and other such activities. Regular meetings will be held with the CLG where the Community Liaison Officer will provide updates on upcoming and current work taking place on site, any changes that may occur (e.g. to due unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). The CLG will allow local residents to raise issues with the Community Liaison Officer and to act as a forum to discuss relevant issues for the operation of the Scheme. Membership will be open to the following non-exhaustive groups:

- Parish Councils;
- Local Residents;
- Local Businesses; and
- Local Community Groups.

### **Stakeholders**

3.2.3 The following stakeholders (or any successor body) will be engaged during operation of the Scheme where activity is relevant to their area of responsibility:

- Bedford Borough Council;
- Huntingdonshire District Council;
- Cambridgeshire County Council;
- Environment Agency;
- Natural England; and
- Historic England.

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## 4.0 OPERATIONAL ENVIRONMENTAL MANAGEMENT

4.1.1 This section of the oOEMP sets out the general principles and control measures that will be employed on Site during the Operational Phase, which are applicable to all aspects of the Scheme.

### Site Security

4.1.2 The Site will be secured during operation by the security fencing surrounding the site which will remain in-situ throughout the period of operation of the Scheme. During the Operational Phase overall management of security will rest with the Site Owner/Operator. All plant and materials will be secured to prevent theft or vandalism. The Site will be monitored through CCTV and other monitoring systems (e.g. weather stations), which will allow monitoring of the site to identify security or other similar issues and reaction to the same.

4.1.3 The security fencing and CCTV & monitoring systems will be regularly inspected to ensure that they are in a good state of repair and operating properly. Where issues are found they will be swiftly rectified.

### Protection of the Public

4.1.4 When maintenance, repair, or replacement activity takes place in addition to the responsibilities set out under Construction (Design and Management) Regulations 2015<sup>2</sup>, the Site Manager will be alert to the risk of works being accessed by unauthorised members of the public and will ensure that site security is maintained at a high standard across the Site to ensure that the risk of access by trespassers is minimised.

4.1.5 A high standard of 'housekeeping' will also be maintained across the site to reduce risks to trespassers in the event that they do gain access to the site. The Storage, Operations and Maintenance Building will be fully secured, and all materials, equipment, and plant will be fully secured when not in use, and in particular at the end of each working day.

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- 4.1.6 Where public rights of way cross the Site or interact with operational activity (e.g. vegetation maintenance activity or where they across access roads) then activity will be suitably managed to protect the public.
- 4.1.7 An outline Public Right of Way Management Plan will be prepared submitted with the application for development consent. This document will set out the principles by which Public Rights of Way (PRoW) will be managed during the construction, operation and decommissioning phases. Should the DCO be granted then a detailed Public Right of Way Management Plan would be produced following grant of the DCO and prior to the start of construction.

### **Management of Vegetation and Planting**

- 4.1.8 An Outline Landscape and Ecological Management Plan (oLEMP) has been prepared and provided as part of the PEIR, and will form part of the DCO application. This provides a framework for the delivery of the landscape strategy and the successful establishment and management of the landscape works proposed as part of the Scheme through short and long-term measures for the establishment, monitoring, and management of the measures it covers. This will ensure that the landscaping measures and the ecological mitigation and enhancement (biodiversity net gain) measures that have been integrated into the Scheme are successfully delivered.
- 4.1.9 If the DCO is granted, the oLEMP will be developed into a detailed Landscape and Ecological Management Plan (LEMP) once a contractor is appointed. The LEMP will be in substantial accordance with this oLEMP, and will be a requirement of the DCO for submission and approval by the LPA prior to construction.
- 4.1.10 The LEMP will operate alongside the detailed OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.



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## Signage

- 4.1.11 Within the Site and at access points signage will be erected setting out required conduct within the site boundaries (e.g. speed limits, warning of possible hazards etc.). Signage will also be erected at any point where an access road crosses or meets a PRoW or a similar route to advise Site Operatives of the risk of pedestrians or other non-motorised traffic being present.
- 4.1.12 Signage will be affixed to site fencing at regular intervals indicating that the site may not be accessed by the public and setting out the risks of entry.

## Inductions

- 4.1.13 All site visitors and new Site Operatives will be directed in the first instance to Storage, Operations and Maintenance Building where they will be required to sign in and undergo a suitable induction.
- 4.1.14 Inductions will be completed as appropriate for the role and in accordance with best practice approaches prior to commencing work or visiting site. Records of inductions and competencies will be held on site.
- 4.1.15 Risk assessments and methods statements will be produced for all activities and they will be site-specific. Operatives will be briefed on method statements and risk assessments relevant to their work prior to their commencing work. Copies of the risk assessments and method statements will be held on site and will be available for use and inspection.
- 4.1.16 Operatives and visitors will be required to sign in and out every day.

## Deliveries & Collection

- 4.1.17 Parking will be provided for staff and visitors at the Operations and Maintenance Area, and this area will be retained for use for these purposes throughout the operation of the Scheme.

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4.1.18 Deliveries and collections of material from the site will be from the Operations and Maintenance Area except where the nature of maintenance/repair activity requires that materials are best delivered to or collected from the area of work. Drivers will be required to report to the Storage, Operations and Maintenance Building during working hours. When the site is not open for deliveries & collections, delivery/collection vehicles will not be permitted to circulate, queue, or wait on the public highway.

### **Health & Safety**

4.1.19 The requirement for comprehensive health and safety assessments are an essential part of the any business activity. A Health & Safety Plan will be produced as part of the OEMP.

4.1.20 Regular meetings will be held between the Site Owner/Operator, Site Manager, and Health and Safety Manager to review matters related to health & safety. The Health and Safety Manager will ensure that they or a suitably qualified member of their organisation regularly visits the site to monitor health & safety matters. Monitoring reports will be produced and provided after these visits.

4.1.21 Reportable accidents and dangerous occurrences will be reported in accordance with RIDDOR<sup>3</sup> (or the current equivalent legislation in place during the operation of the Scheme).

4.1.22 In line with other requirements in this section, appropriately licenced operatives will be appointed to undertake work, a safe system of working established prior to commencement of works, and Personal Protective Equipment (PPE)/Respiratory Protective Equipment (RPE) suitable for the tasks must be worn by operatives.

### **Contamination**

4.1.23 Should a pollution incident occur, the relevant external organisations would be contacted. The details of those organisations will be provided on the

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relevant notices, for example with a spill kit and as part of the Emergency Spillage Plan, and be held by the Site Manager overseeing the work. This could include:

- Environment Agency;
- Police;
- Fire and Rescue Service;
- National Grid;
- Natural England; and
- The Local Planning Authorities of Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council.

4.1.24 All accidents, incidents and near misses (including spills, dust, noise pollution etc.) will be reported to the Site Manager immediately. These will be recorded and investigated as appropriate. Details to be recorded will include: a description of the incident, potential contributory causes, adverse effects, measures implemented to mitigate adverse effects, and effectiveness of measures implemented to prevent incidents happening again.

### **Welfare Provision**

4.1.25 The Storage, Operations and Maintenance Building will include welfare facilities and is expected to meet the needs of operatives present on site for the majority of activity. Where maintenance, repair, or other such work is taking place at a distance from the Storage, Operations and Maintenance Building it may be necessary to provide temporary facilities for welfare. If so, these will be fit for purpose, and at minimum will include toilet facilities and welfare facilities that store foul/wastewater. These will then be collected/emptied by specialist licenced contractors.

### **Lighting**

4.1.26 During operation no part of the Scheme will be continuously lit as this will not be required for its operation.

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- 4.1.27 The East Park Substation will require artificial lighting in order to provide security and ensure the health and safety of those working on the site. However, this will be designed and sited to minimise impacts on human and ecological receptors, and would generally only be required at night or during low light levels. The lighting will be manually operated and will not be on when staff are not working in the substation. Planned maintenance of the substation will take in daytime hours, thus limiting the need to use lighting to unplanned maintenance or to address site specific safety or security matters.
- 4.1.28 In other parts of the site temporary mobile lighting may be required during winter months, or during periods where unexpected work must occur, where work is taking place on the site to allow for work to take place and to ensure the health and safety of the Operatives on site. Lighting will be operated to minimise impacts on human and ecological receptors, and would generally not be operated outside of the specified working hours. Lighting will utilise directional fittings to minimise outward light spill and glare.

## Utilities

- 4.1.29 Utilities companies will be engaged with to identify 'utilities infrastructure' (e.g. gas pipelines, water mains, electricity cables etc.) set within or around the site and to agree safe working methods around that infrastructure. This will include agreeing required offsets around that 'utilities infrastructure' where set working practises must be followed, and Operatives will be advised of these areas where they are required to work close to or in them.

## Emergencies, Fire Plan, and Special Site Instructions

- 4.1.30 An Emergency Response Plan (ERP) will be developed prior to Operational Phase commencing and this would form part of the detailed OEMP. This will be produced in consultation with the emergency services, the Local Authorities Emergency Planning Officers, and the Environment Agency. This will set out procedures on how to respond to an emergency, and details of the services and organisations to be notified.

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- 4.1.31 The OEMP will detail the procedures for responding to incidents and emergencies on site, and any reporting arising from them.
- 4.1.32 A notice displaying emergency contact details will be displayed in a prominent location onsite – such as within the Storage, Operations and Maintenance Building. External notices providing emergency contact details will be placed at prominent locations around the perimeter of the site.
- 4.1.33 A Battery Safety Management Plan for the BESS will be produced and an outline Battery Safety Management Plan will be prepared for submission with the application for development consent. The outline Battery Safety Management Plan will set out measures to ensure the safety of the BESS and procedures to be followed in the event of a fire or other accident.
- 4.1.34 At Site Induction all site personnel must be advised of the firefighting equipment on site and the escape routes & procedures. A Fire Plan will be kept in the site file (as part of the ERP). Permits for hot working will be issued as required.

### **Certification of Mobile Plant**

- 4.1.35 All plant will have the appropriate certification and checks with copies held on file on site. All plant will be regularly inspected, and records of these inspections will be held on file on site.

### **Waste management**

- 4.1.36 The Waste Hierarchy must be applied by any person who produces, keeps or manages waste per the duty set out in the Waste (England and Wales) Regulations 2011<sup>4</sup>. The Waste Hierarchy requires any person managing waste to first consider waste prevention, then preparing material for re-use or recycling, and only then use waste recovery methods (i.e. firstly energy recovery), and then waste disposal as the last option. Thus, the waste hierarchy must be applied when managing the Operational Phase of the Scheme.

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4.1.37 Detail of measures to minimise, re-use, and control waste are set out later in this document and will be detailed in the OEMP prior to operation commencing. However, briefly, these will as a minimum include:

- Take all reasonable steps to minimise the volume of waste generated by the Operational Phase of the Scheme (e.g. reduce and re-use);
- Separate main waste streams on the site and segregate them to maximise opportunities of re-use and recycling; and,
- Where waste is to be removed from the site to a waste facility then fully licenced waste carriers will be used and waste will be taken to licenced facilities.

### Surface water management

4.1.38 An outline Surface Water Management Plan (oSWMP) has been prepared as **PEIR Volume 2 Appendix 8-2** and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. It also details measures for management of fire water run off in the event of a fire at the BESS. If the DCO is granted, the oSWMP will be developed into a detailed Surface Water Management Plan (SWMP) once a contractor is appointed. The SWMP will be in substantial accordance with the oSWMP, and will be a requirement of the DCO, for submission and approval by the LPAs prior to construction.

4.1.39 The SWMP will set out the proposed management measures for surface water quality and management of surface water (including the rate and volume of surface water run off during operation). It will apply the same principles and approach set out in the oSWMP (**PEIR Volume 2 Appendix 8-2**).

4.1.40 The SWMP will operate alongside the detailed OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

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## Flood risk

- 4.1.41 Limited sections of the site are subject to fluvial flood risk, with critical infrastructure placed outside of those areas. However, there is some risk of pluvial flooding in parts of the site from surface water and smaller watercourses. The Scheme has been designed to account for those risks (per **PEIR Volume 1 Chapter 8**, and the Flood Risk Assessment at **PEIR Volume 2 Appendix 8-1**).
- 4.1.42 To manage the residual risk of flooding to Site Operatives a Flood Warden will be appointed, who will be familiar with the Site and risk, and will ensure that Operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.

## Liaison with Public

- 4.1.43 Neighbouring residents will be actively informed about any substantial maintenance, repair, or replacement work on the Site throughout the duration of the Operational Phase of the Scheme via the CLG. Regular communications will be sent to them to provide updates on such work, any changes that may occur (e.g. due unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). These will also include details of a contact telephone number and the project website.
- 4.1.44 A contact telephone number will be maintained throughout the operation of the Scheme (including an outside of working hours [out of hours] number for use if required) to allow members of the public, local businesses, and other such parties to make enquiries or raise a complaint. The telephone number provided to local residents and businesses will be maintained at all times during the Operational Phase in order to respond to any enquiries and complaints.
- 4.1.45 A project website will be maintained throughout the operation of the Scheme to allow members of the public, local businesses, and other such parties to

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view updates on the Scheme, make enquiries or raise a complaint. The project website will be maintained at all times whilst the Scheme is in operation in order to respond to any enquiries and complaints.

4.1.46 Any complaints arising from the site during the Operational Phase will be addressed by the Site Manager. A Complaints Register will be maintained, and this will include the following:

- Complainant's details.
- Date and time of the complaint.
- Cause(s) of the complaint.
- Action taken to resolve the complaint, and date and time of the same, or reasons for any unresolved complaints (including where no issue is found).

4.1.47 The Complaints Register will be regularly reviewed as part of monitoring of the OEMP to ensure that it is being followed, that any issues are identified, and to monitor compliance with its Management and Mitigation Measures.

### **Best practice measures**

4.1.48 The Considerate Constructors Scheme (CCS), or equivalent at the time of Operational Phase of the Scheme, will be adopted for the Scheme for relevant repair or replacement activity. This standard includes best practice measures that go beyond statutory compliance and thus will further reduce pollution and nuisance from the Scheme.

### **Monitoring & Implementation Arrangements**

4.1.49 The Site Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions noted in this OEMP are undertaken. Detail of general monitoring requirements are set out later in this document.



## 5.0 ENVIRONMENTAL MITIGATION MEASURES

5.1.1 The following tables set out outline mitigation and management measures that would as a minimum form part of the OEMP. These have been prepared using detail set out in the PEIR of required measures for each topic. These measures would be secured via the requirements of the DCO, and that a final OEMP would be prepared by the Applicant (or a suitable person nominated by them) prior to the Scheme commencing operation.

**Table 5.1: Summary of the operational mitigation and management measures – Landscape and visual**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Potential loss of vegetation due to activity during operation	The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, and includes detail of measures to manage vegetation during the Operation of the Scheme. Those measures will be followed thus ensuring that vegetation to be retained is protected during the Operational Phase of the Scheme, and suitable replacement vegetation is planted wherever losses occur.	Appropriate surveys undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.
Visibility of the Scheme	The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, and includes detail of measures to manage all vegetation during the Operation of the Scheme and ensure that it mitigates potential impacts upon the landscape and enhances the value of the site. Those measures will be followed thus ensuring that is protected during the Operational Phase of the Scheme, and that new planting is provided and maintained where required throughout the Operational Phase.	Appropriate surveys undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.  Use of temporary site lighting will be monitored in accordance will

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Temporary site lighting required during maintenance or repair activities to enable safe working during hours of darkness will be designed as far as reasonably practical so as not to cause a nuisance outside of the Scheme. Standard best practice measures will be employed to minimise light spill, including glare.	measures to be determined in the OEMP. The OEMP will detail the frequency of monitoring.

**Table 5.2: Summary of the operational mitigation and management measures – Cultural Heritage**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon setting of heritage assets set outside of the site	<p>The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, inclusive of the setting of heritage assets outside of the site. Those measures will be followed thus ensuring that is protected during the Operational Phase of the Scheme, and that new planting is provided and maintained where required throughout the Operational Phase.</p> <p>Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.</p>	<p>Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p> <p>Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.</p>

**Table 5.3: Summary of the operational mitigation and management measures – Ecology**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Potential habitat loss or disturbance to wildlife through	Where repair or maintenance works will require vegetation or ground clearance then such works will be reviewed with the EcoCoW to determine what impacts may arise, and to set out measures to address these including delaying works	An EcoCoW will be appointed for the Operational Phase who will review and monitor all works on Site.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>management and maintenance activities on site.</p> <p>Indirect and direct impacts to on-site habitats.</p>	<p>where this is necessary (e.g. during the nesting season if nests are found to be present).</p> <p>The outline LEMP sets out measures for the delivery of the landscape strategy, which would also ensure that the ecological mitigation and enhancement (biodiversity net gain) measures that have been integrated into the Scheme are successfully delivered. The detailed LEMP that will be produced following the grant of a DCO will include measures to ensure that impacts from management activities are minimised and harm to fauna is avoided. Those measures will be followed during the Operational Phase of the Scheme.</p> <p>Lighting to be used only where required, and if used to be task specific and directed away from boundary habitats including woodland, hedgerows and watercourses.</p> <p>Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oOEMP.</p>	<p>Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p> <p>Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.</p>

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Impact upon water quality from run-off from permanent hardstandings and structures.</p> <p>Impact of surface water flows upon watercourses from new hardstandings. and flows form the same</p>	<p>An outline Surface Water Management Plan (oSWMP) has been prepared as <b>PEIR Volume 2 Appendix 8-2</b> and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. If the DCO is granted, the oSWMP will be developed into a detailed Surface Water Management Plan (SWMP) once a contractor is appointed. This will include measures for the proposed management measures for surface water quality, and management of surface water (including the rate and volume of surface water run off) during operation. The surface water management measures must then be maintained and operated per the SWMP.</p>	<p>Drainage features will be regularly monitored to ensure that they are operating effectively. Specific details of this monitoring will be confirmed in detailed SWMP.</p> <p>Requirements for a detailed watercourse quality monitoring plan will be agreed with the regulator. This would include details of all</p>

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Chemical and fuel spillages resulting in pollution of watercourses and/or ground water</p>	<p>Equipment and spill kits will be provided to contain and clean up any spills to minimise the risk of pollutants entering watercourses.</p> <p>Where fuel, oil or solvents are stored temporarily on Site, these containers will all be stored within bunded areas and covered.</p> <p>Additional precautions would be taken during plant operation in any areas where there is storage of fuels or chemicals.</p> <p>A pollution incidence response plan will be produced prior to operation commencing and will be reviewed and updated regularly by the Site Manager. Training will be provided to site workers as part of induction processes and will be updated as necessary. This plan will contain information relating to the location of spill kits and any sensitive receptors, as well as the procedure for incident response. In the unlikely event of any incident, the Site Manager will be notified and will work to coordinate remedial actions.</p>	<p>baseline, construction phase and post construction (operational phase) monitoring, which will involve both visual assessments and quality testing.</p> <p>ERP to include measures in respect of containing and then treating fire water in the event of a fire at the BESS. Should an event occur then effectiveness of measures will be monitored and reported upon.</p>
<p>Uncontrolled release of fire water in the event of a fire</p>	<p>An outline Surface Water Management Plan (oSWMP) has been prepared as <b>PEIR Volume 2 Appendix 8-2</b> and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. It also details of management of fire water run off in the event of a fire at the BESS. If the DCO is granted, the oSWMP will be developed into a detailed Surface Water Management Plan (SWMP) once a contractor is appointed. The SWMP will be in substantial accordance with the oSWMP, and will be a requirement of the DCO, for submission and approval by the Local Planning Authorities (LPA) prior to construction.</p> <p>The Emergency Response Plan (ERP) will include steps to ensure that fire water is contained within the site in the event of a fire, and then for its subsequent treatment.</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Foul Drainage	<p>There will be no unapproved discharge of foul drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway. The sewage system for the Storage, Operations and Maintenance Building will be maintained and managed as required.</p> <p>Where temporary welfare facilities are in place sewage and foul water will be collected in appropriate collection tanks. Regular collection and disposal of sewage and foul water will be conducted by a licenced company.</p>	
Risk of flooding to Site Operatives	A Flood Warden will be appointed, who will be familiar with the Site and the risk of flooding in the area, and will ensure that Operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.	Monitoring of flood events by Flood Warden and recording of response to these and effectiveness of measures taken.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Movement of vehicles during operation	<p>The Operational Phase of the Scheme would generate a low level of trips (staff vehicles, small number of delivery and service vehicle trips, and occasional access by HGVs during replacement of items such as transformers etc.). Therefore, there is not expected to be any significant effect upon the highway and so no specific mitigation measures are proposed.</p> <p>The Site Accesses, access tracks, and parking area at the Storage, Operations and Maintenance Building will be maintained throughout the Operational Phase of the Scheme.</p>	The Site Manager will undertake such monitoring as is necessary. Further details to be confirmed in the OEMP.

**Table 5.6: Summary of the operational mitigation and management measures – Noise and Vibration**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Impact of noise arising from operation at noise sensitive receptors (NSR).</p>	<p>The Scheme includes embedded mitigation through the design of the Scheme. During the operation of the scheme the measures developed to reduce noise impacts to a minimum and per the levels set out in <b>PEIR Volume 1 Chapter 10</b> and any requirements in the DCO will be followed in the choice of any replacement plant/equipment. The final layout of the Scheme and the electrical plant therein will be designed such that the noise limits set in the DCO are not exceeded.</p> <p>Equipment will be regularly inspected and checked for signs of disrepair or other problems that are creating an increase in volume or change in tonality. Where complaints are received then these will be investigated, where required by a suitably qualified practitioner working to the latest version of BS 4142, to identify the source of any issue. Where an issue is found action will be taken to resolve it within a reasonable timeframe.</p>	<p>The OEMP will include detail of required performance levels of operational plant in respect of noise, and required recording of inspections of the same.</p> <p>The Environmental Manager will record any complaints in the relevant system for doing so, and record the result of any complaint.</p>
<p>Impact of noise arising from maintenance and repair activities at noise sensitive receptors (NSR).</p>	<p>Restriction of hours in line with DCO requirements. Requirements in the OEMP for sensible routing of plant to minimise noise, plant regularly maintained, plant fitted with effective silencers/any relevant acoustic hoods, plant switched off when not in use, use of non-tonal 'broadband noise' type reversing alarms, use of boundary hoarding screening when working in close proximity to NSR, maximise distance between NSR and any significant noise source and community relations (providing NSR with clear information about activities taking place and length of time that any peak noise may occur).</p>	<p>Appropriate survey/s undertaken to show compliance with noise threshold guidance, and compliance with measures regularly recorded via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.</p>

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

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
<p>Impact of dust arising from activities on the site, and movement of vehicles within and outside the site</p>	<p>Best Practice Measures will be set out in the OEMP to control and manage dust emissions. Measures to be derived from Institute of Air Quality Management (IAQM) guidance.</p> <p>Measures would include:-</p> <ul style="list-style-type: none"> <li>- Use of suitable dust suppression measures or techniques when using cutting, grinding, or sawing equipment.</li> <li>- Suppression of dust/particulate matter using non-potable water where possible and appropriate.</li> <li>- Dry spillages to be cleaned as soon as possible after the event using suitable equipment and wet cleaning methods.</li> <li>- Fully enclosing the site of operations where there is a high potential for dust production and there is a high potential of impacting upon receptors for an extended period.</li> <li>- Ensure the proper maintenance of access roads, clean the highway or access roads where material is tracked onto them.</li> <li>- Ensuring that any material being carried in vehicles is properly secured and contained.</li> <li>- Inspection of vehicles before using public highway and removal of dust/soil where required.</li> <li>- Where earthworks are required then their extent is to be minimised to reduce exposed areas, and completed earthworks and other exposed areas to be covered with topsoil and re-vegetated as soon as practical to stabilise surfaces.</li> </ul>	<p>Compliance with measures to be regularly recorded via an appropriate method to be set out in the OEMP. Site inspections and road monitoring to be undertaken as required.</p>

**Table 5.8: Summary of the operational mitigation and management measures – Ground conditions**

<b>Potential Impact being managed / mitigated</b>	<b>Mitigation and/or management measure to be implemented</b>	<b>Requirement for monitoring</b>
Encountering unexpected contamination during construction phase	As detailed within 4.1.23. Unexpected contamination protocol to accompany oOEMP which details what to do in the event that potential contamination is encountered within unexpected areas.	To be specified within protocol for encountering unexpected contamination.
Generation of contaminated run-off	Implementation of Emergency Pollution Incident Protocol to be included as part of the OEMP to include, amongst other information, contact with appropriate regulatory authorities as detailed in 4.1.23.	Monitoring and sampling as detailed within Emergency Pollution Incident Protocol to be included as part as OEMP.
Pollution caused from generation of foul sewage within welfare facilities compounds	Welfare facilities will only be deployed on the rare occasion where they are needed for works away from the Storage, Operations and Maintenance Building. Measures are set out at table 5.4 of the oOEMP to address the management of these.	See table 5.4 of the oOEMP.
Leaks and spillages of fuel and chemicals required for maintenance and repair activity and of cleaning agents or other hazardous materials	<p>The storage of fuels or chemicals and cleaning agents required during the operational phase will be limited to cleaning agents, fuel for equipment, fuel for diesel generators to provide power work areas, and above ground diesel and ad-blue tanks / fuel tankers for re-fuelling Site plant. Fuel storage would be housed appropriately and banded, refuelling would be limited to designated re-fuelling areas.</p> <p>Cleaning agents and other hazardous materials will be stored in a suitable banded location on site, and will be returned to this location in properly sealed containers at the end of each working day.</p>	<p>Monitoring of fuel, chemicals, cleaning agents and hazardous materials storage and procedures as stipulated within the oOEMP.</p> <p>Inspection of equipment as stipulated within the oOEMP.</p>



Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>A suitably stocked spill-kit will be retained within the Site, and an Emergency Spillage Plan will be prepared setting out procedures to respond to a spillage, and for reporting if required to the Environment Agency.</p> <p>Equipment to be regularly inspected to ensure that damage or leaks are identified early and repairs are made or equipment is replaced.</p>	

**Table 5.9: Summary of the operational mitigation and management measures – Land and Soils**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts to Soils through compaction, and loss or degradation	<p>Mitigation measures to protect soils during construction will be set out in a Soil Management Plan (SMP) to be appended to the final OEMP prior to the Operational Phase commencing. This will include as a minimum:-</p> <ul style="list-style-type: none"> <li>- Movement of maintenance vehicles around the Site to generally be on access tracks, with movement off these only when soils are dryer and less susceptible to compaction and waterlogging and vehicles to use low-pressure tyres to distribute weight where possible.</li> <li>- Landscape maintenance vehicles will have lower pressure types, and will generally only access relevant areas only when soils are dryer and less susceptible to compaction and waterlogging.</li> <li>- The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, and includes detail of measures to manage vegetation during the Operation of the Scheme. This will also ensure proper management of the soils on site, and reduce the potential for the degradation or compaction. Those measures will be followed thus ensuring that vegetation is properly managed and maintained in the Operational Phase of the Scheme.</li> </ul>	<p>Soil assessments and monitoring will take place as detailed in the SMP (to be appended to the OEMP prior to the Operational Phase commencing). The Environmental Manager will be responsible for ensuring compliance with measures regularly recorded via an appropriate method to be determined in the SMP.</p> <p>For the LEMP, appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.</p>

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

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

**Table 5.11: Summary of the operational mitigation and management measures – Climate change**

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts on on-site workers from adverse weather conditions, flooding, or other exceptional events	Weather conditions to be monitored, and working practices altered to account for adverse weather conditions including flood risk.	Monitor logging of weather forecasts and distribution to staff/contractors, and reaction to same, as part of OEMP monitoring.
	Risk Assessment Method Statements to be developed for activities.	Monitor Risk Assessment Compliance and performance as part of OEMP monitoring.
	Training of staff on health and safety matters and site rules, provision of appropriate PPE.	Monitor compliance of staff/contractors with Health and

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
		Safety rules, site rules, and use of PPE as part of OEMP monitoring.
Damage to equipment	Equipment, plant and materials to be chosen which comply with appropriate safety standards and expected conditions.	Monitor choice/specification of equipment/plant/materials and performance of same as part of OEMP monitoring.

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

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of waste arising from maintenance/replacement/repair activities on the site, and from Site Operatives.	All reasonable actions will be taken by the Site Owner/Operator to minimise the volume of waste produced as a result of the Operation of the Scheme. This can be through reducing consumption, reuse, using resources efficiently, and designing for longevity.	A Register of waste loads from the Scheme is to be maintained to allow monitoring against measures regularly recorded via an appropriate method to be set in the OEMP. The Environmental Manager will be responsible for ensuring compliance.
	Implementation of measures to reduce waste through control over materials/equipment procurement, to include:- <ul style="list-style-type: none"> <li>- Just-in-time material delivery system to avoid materials/equipment being stockpiled, which increases the risk of their damage and disposal as waste.</li> <li>- Attention to material quantity requirements to avoid over-ordering and generation of waste materials due to surplus.</li> </ul>	
	Waste from operational activity (site offices & welfare facilities, maintenance of vehicles, packaging from incoming materials, other waste from maintenance of	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	the site etc.) to be separated/segregated into main waste streams and stored appropriately prior to collection by an approved waste contractor.	
	Waste to be collected by an approved, licensed third party waste facility for recycling and disposal.	
	Re-use of material & waste arising from replacement of Scheme infrastructure to be secured wherever possible. Where materials arising from such activity are initially unable to meet the re-use criteria, they would either be treated to make them suitable for use or, as a last resort, disposed off-site as waste.	
	Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier.	
	The volume of waste streams generated by the Scheme to be estimated and goals set with regards to the waste produced, re-use and recycling, and off-site disposal.	

## 6.0 IMPLEMENTATION OF MANAGEMENT PLAN

6.1.1 The OEMP will define all responsibilities roles and actions required for implementation of the measures that are set out in this oOEMP. These will include as a minimum:

- The team roles and responsibilities, and the named individuals fulfilling those roles. An organogram and contact directory will also be included;
- The procedures required for monitoring, inspection and reporting of site operations;
- Document control systems and procedures;
- Detail of the communication strategy (stakeholders and third party);
- Detail of the required training for key personnel on environmental topics relevant to the Scheme and OEMP. This will include detail on toolbox talks and on-site briefings required to ensure that relevant staff and Site Operatives are aware of the requirements for environmental control and procedures for the same, and that they have the required level of knowledge to deliver them;
- Detail of measures to ensure that staff and personnel are advised of changes to circumstances as work progresses on the Scheme; and
- Procedures for environmental emergencies.

## 7.0 MONITORING AND MAINTENANCE

### 7.1 Monitoring

- 7.1.1 To ensure and demonstrate compliance with the measures set out in the OEMP, monitoring and reporting will take place throughout the Operational Phase of the Scheme. This process will also include oversight of the resulting reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits to be undertaken will be provided in the OEMP.
- 7.1.2 The Environmental Manager will regularly observe site activities and in particular will attend when new activities first occur, to ensure compliance with the OEMP, raise deviations where they occur, and to monitor actions and conditions on the site. They will also undertake regular walkover surveys of the site to monitor compliance with the OEMP. They will also undertake regular inspections as required by the OEMP and overall audits of the OEMP to ensure compliance with its requirements. They will also meet regularly with the Site Manager to discuss the operation of the Scheme and any issues arising from that or their inspection/monitoring activities. They will also undertake day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.
- 7.1.3 All activities observed by the Environmental Manager, the results of surveys and inspections undertaken by them, and reports produced by them will be documented and logged.
- 7.1.4 Where complaints are received from members of the public these will be logged by the Site Manager in a record keeping system. These logs will include details of the complaint, and actions arising from the same.
- 7.1.5 Similarly, where matters or complaints are raised by the CLG, these will be logged by the Community Liaison Officer in a record keeping system. These logs will include details of the matter/complaint, and actions arising from the same.

7.1.6 All complaints will be reviewed by the Site Manager, Community Liaison Officer, and Environmental Manager, and the result of the review and any corrective actions taken will be logged. The Complaints Log will be reviewed for signs of wider on-going issues, and where these are identified corrective action will be taken.

## 7.2 Record keeping

7.2.1 A Quality and Safety Management Systems (QMS) and Environmental Management System (EMS) will be provided by the Site Owner/Operator. These will be certified in line with the ISO 14001 standards (or any equivalent standard in place during the Operational Phase).

7.2.2 Those systems will ensure that records are kept of monitoring, recording, and implementing of environmental management measures for the Scheme. This is vital to ensuring that the Scheme is delivered with a high standard of environmental control throughout the Operational Phase of the Scheme, and that corrective actions are undertaken.

7.2.3 A central record keeping system will be established (by the Quality Manager, or a suitable person with delegated responsibility for the same) which will provide a repository for procedures, checklists, reports and other such measures required for the EMS and QMS. This will include maintaining records of inspections, audits, or other such activity undertaken by internal or external parties undertaking audit of the OEMP and measures therein. These would include the following records as a minimum:-

- Licenses, approvals, and other similar regulatory documentation.
- Environmental surveys.
- Environmental equipment test records.
- The Environmental Action Schedule.
- Records of routine site inspections.
- Details of incidents, breaches of the OEMP, or complaints from third parties, and corrective action taken in respect of the same.

- 7.2.4 A full review of the OEMP will be undertaken at regular intervals and as required to respond to specific issues that may arise. Where a review identifies an issue that requires additional control measures or mitigation be added to the OEMP, or amendment to existing measure or mitigation, then these changes will be made only after prior agreement from the Local Authorities.
- 7.2.5 The records held in respect of the OEMP will be made available for the purposes of monitoring compliance with the OEMP where a request is made by a Local Planning Authority, the Environment Agency, Natural England, or Historic England (or any equivalent successor body).



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## 8.0 REFERENCES

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<sup>1</sup> HMSO (2017). Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/572> [Last Accessed: 17 September 2024]

<sup>2</sup> HMSO (2015). The Construction (Design and Management) Regulations 2015. Available at: <https://www.legislation.gov.uk/uksi/2015/51> [Last Accessed: 17 September 2024]

<sup>3</sup> HMSO (2013). The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. Available at: <https://www.legislation.gov.uk/uksi/2013/1471> [Last Accessed: 17 September 2024]

<sup>4</sup> HMSO (2011). Waste (England and Wales) Regulations 2011. Available at: <https://www.legislation.gov.uk/uksi/2011/988> [Last Accessed: 17 September 2024]